ADVICE OF THE WESTERN INTERCONNECTION REGIONAL ADVISORY BODY ON THE FEDERAL ENERGY REGULATORY COMMISSION’S PROPOSED RULEMAKING FOR THE AVAILABILITY OF CERTAIN NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION DATABASES TO THE COMMISSION

The Western Interconnection Regional Advisory Body (“WIRAB”)1 appreciates the opportunity to submit advice to the Federal Energy Regulatory Commission (“Commission”) on the notice of proposed rulemaking issued on September 17, 2015 for the availability of certain North American Electric Reliability Corporation (“NERC”) databases to the Commission.2

WIRAB supports the Commission’s rulemaking to gain access to NERC databases to allow it to form a more in-depth understanding of NERC’s reliability and adequacy assessments and to implement standards under Section 215 of the Federal Power Act to improve the reliability of the Bulk Electric System (“BES”).

The Commission proposes to amend its regulations to require NERC to provide the Commission, and its staff, with access to certain non-public databases maintained by NERC on an ongoing basis. The Commission is requesting access to the following databases: (1) the Transmission Availability Data System (“TADS”), (2) the Generation Availability Data System (“GADS”), and (3) the protection system misoperations database. These databases, limited only to U.S. facilities, will provide the Commission with information necessary to determine the need for new or modified Reliability Standards and to better understand NERC’s periodic reliability and adequacy assessments. WIRAB supports the Commission’s rulemaking because as a regulator, access to these databases, is necessary for the Commission to better implement Section 215 of the Federal Power Act.

1 WIRAB is authorized, pursuant to Section 215(j) of the Federal Power Act, to provide advice to Western Electricity Coordinating Council (“WECC”), the Electric Reliability Organization (“ERO”) (i.e., NERC), and the Commission on whether proposed reliability standards and the governance and budgets of the ERO and WECC are in the public interest, and on any other topic upon which the Commission requests guidance.

The Commission’s proposed rule appropriately recognizes the importance of maintaining the non-public status of the databases. The data contained in these databases can be sensitive in nature because it consists of outage information for both transmission and generation facilities in the TADS\(^3\) and GADS\(^4\) databases, and protection system misoperation events pursuant with Reliability Standard PRC-004\(^5\) and made available to NERC through a 1600 data request\(^6\).

The Commission’s proposed rule also appropriately limits the scope of its data collection to U.S. facilities. NERC is an international regulatory authority whose mission is to assure reliability of the BES in its area of responsibility, which includes the continental United States, Canada and the northern portion of Baja California, Mexico.\(^7\) Therefore, NERC maintains data in its databases for all of the facilities in its area of responsibility, which includes facilities in Canada and Mexico, outside of the Commission’s jurisdictional authority.

WIRAB’s membership is comprised of representatives of Western states, Western Canadian provinces, and the area of Mexico with electric load in the Western Interconnection. The representatives are primarily Public Utility Commissioners or Energy Office Directors who understand the importance of having quality data available to make fully vetted regulatory and policy decisions. WIRAB supports the Commission’s proposed rule to gain access to NERC reliability databases.

Respectfully Submitted,

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\(^6\) See generally NERC, Request for Data or Information Protection System Misoperation Data Collection (August 14, 2014), [http://www.nerc.com/pa/RAPA/ProtectionSystemMisoperations/PRC-004-3%20Section%201600%20Data%20Request_20140729.pdf](http://www.nerc.com/pa/RAPA/ProtectionSystemMisoperations/PRC-004-3%20Section%201600%20Data%20Request_20140729.pdf)

\(^7\) See NERC, About NERC (accessed November 20, 2015), [http://www.nerc.com/AboutNERC/Pages/default.aspx](http://www.nerc.com/AboutNERC/Pages/default.aspx)
/s/ Maury Galbraith
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Denver, CO this 15th day of December, 2015.

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