

November 2, 2020

RE: Stakeholder Engagement Task Force Straw Proposal

Powerex appreciates the opportunity to comment on the Stakeholder Engagement Task Force (SETF) Proposal that was sent out to WECC membership on Oct 19, 2020. Powerex also wishes to recognize the hard work and dedication of the task force in engaging WECC stakeholders on such an important topic, which has far reaching effects on how WECC engages and interact with WECC members and other stakeholders.

Powerex is supportive of the WECC Board Section 4.9 Review, and the creation of the Task Force to evaluate options on how to re-organize the current committee structures to be more effective and engaging for WECC members. Powerex understands from the SETF workshops, conducted on Oct 23rd and 28th, that the straw proposal is preliminary and a final proposal will not be put forth to the WECC Board at the December meeting. Powerex appreciates that the short comment period between Oct. 19th and Nov. 2nd will not be the only opportunity for stakeholders to provide input on the proposal, and the SETF plans to have another comment period in mid-November for further feedback.

Powerex appreciates the clarifications that it received during the workshops and provides the following feedback on the proposal.

Element 1: Standing Committees

Powerex understands the need for a more efficient structure for Standing Committees (SC) and having meaningful work products that support WECC's goals and mandate, but there are several questions that remain unanswered in the preliminary proposal. It would also be helpful if the SETF could provide a list of current OC and MIC sub-committees and their associated work products, and also perform an analysis as to which sub-committees would be retained under a new structure and which work products will continue to be conducted by the new SC. It is extremely important that work that is currently being conducted continues to be produced and is not lost during a transition.

The SC provide members valuable information regarding industry updates and ongoing events/issues that may be pertinent for utilities. Powerex does not believe that these updates should be considered a secondary benefit or of less importance and may in fact provide reliability benefits for utilities.

Powerex is quite concerned about the limited membership model contained in the proposal. We understand that this concept of limited membership has not been flushed out, but it is quite important that representation from all sectors be taken into account in any committee structure. Powerex does not support a structure where the committee is heavily favored towards one segment

or sector, such as transmission owners and providers, which could potentially lead to limited discussions regarding markets in the Western Interconnection. If such a limited membership were proposed, then Powerex supports retaining the current MIC / OC structure to ensure that WECC's current MIC members are adequately represented.

There are also several issues that could result from a limited membership model and Powerex believes that SETF should consult further with WECC members about these concerns. Powerex understands the goal of SETF is to increase active engagement and ensure that committee members are dedicated to produce the work products required by the committee. But a limited membership model could possibly lead to several entities disengaging from WECC if they do not obtain a seat in the SC, leaving a small subset of subject matter experts to draw upon for work products and provide input to WECC. The broad diversity of the membership provides significant value in the creation of work products, even if members only weight in on limited aspects of individual work products.

The creation of a singular committee has its benefits including efficiency and cost savings, but there is a possibility that certain issues may not be addressed in a timely manner or that certain topics will be given priority over others. These concerns need to be addressed in the next iteration of the proposal.

Element 2: Performance Review Board (PRB)

Powerex believes that a Review Board could be an adequate replacement to the Joint Guidance Committee, but is concerned that the scope and mandate of the proposed PRB is quite expansive. Powerex believes that further dialogue is required between the SETF and WECC members to determine the adequate level of oversight and guidance. The current proposal creates a structure for the PRB that may not be conducive to increasing engagement or quantity of work products.

Many subject matter experts that participate in committee work do so in addition to their current roles at their respective organizations, and it appears from the proposed language that creating a PRB concerned about timely delivery of work products may be counterproductive to increasing engagement of stakeholders.

It would also be quite subjective for the PRB to determine if the work conducted by subject matter experts is relevant and of importance. Currently, issues raised by members are tabled at committees and sub-committees where they are debated and discussed. The proposed structure of the PRB could determine that an issue of importance to a WECC member is not relevant and should not be discussed as part of the committee work. This aspect should not be ceded to the PRB, and should be discussed in detail with WECC stakeholders in upcoming workshops.

Element 3: Standing Committee Project Management

Powerex is supportive of the concept proposed under this element, but is concerned that there is a heavy focus on creating projects and strict timelines for work being conducted by committees.

Powerex has experienced during its participation on committees, sub-committees and task forces that certain tasks may require longer time periods to discuss and debate issues, obtain relevant data, and determine possible options or solutions to a problem. Some issues are quite complex and require flexibility in terms of managing deliverables. Powerex believes that the current proposal is imposing a rigor that may be detrimental in the creation of quality work products. SETF should further engage WECC membership regarding this aspect of the proposal.

Element 4: Subcommittee, Work Groups, and Task Forces

Powerex wishes to re-iterate its comments from Element 1 that a careful evaluation and gap analysis is required regarding the work products being delivered from sub-committees and task forces to avoid having situations where valuable work is lost or no longer conducted. Powerex is concerned that the language may be interpreted to mean that most, if not all, sub-committees and task forces will be dissolved. There is value in having regular sub-committees, such as ISAS, exist so that membership can continue to discuss issues and relevant material. If the ISAS were dissolved, it would create a vacuum where scheduling and accounting issues would be handled on a case by case basis and resident subject matter experts that currently participate in ISAS may not be available to provide an industry wide perspective on the issue. SETF should further engage WECC membership regarding this aspect of the proposal.

Element 5: Performance and Stakeholder Metrics

Powerex is supportive in creating metrics for evaluating areas in an organization. Powerex is concerned that the metrics proposed, such as “number of downloads” or “requests for presentation”, may not be the most appropriate metrics and further discussion with WECC members is required to determine metrics that may be measurable and also account for the value derived by members from a committee.

In summary, Powerex appreciates the thoughtful approach taken by SETF and encourages the task force and Board to continue to engage the membership regarding the areas of concern. Powerex is also aware that the Market Interface Committee has submitted comments and we look forward hearing SETF’s responses to all the comments put forth by the membership. We look forward to following the task force’s work over the next several months as it creates a comprehensive proposal that addresses concerns expressed by stakeholders.

Sincerely,

Raj Hundal
Market Policy and Practices Manager