

WRAB Staff Comments on the WECC's Proposal to Classify Production Cost Model Data as Confidential Information

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WRAB Staff appreciates the opportunity to comment on the Western Electricity Coordinating Council's (WECC's) proposal to amend its Information Sharing Policy for production cost model (PCM) data. This proposal would reverse WECC's historic practice of maintaining a publicly available PCM database and potentially undermine its role as a reliable custodian of data for the Western Interconnection.

WRAB Staff comments address two points. First, WECC's historic policy has been to produce a public database that have been vetted in an open and transparent stakeholder process. This practice has been a valuable asset for the public interest. WECC's PCM data has been used by numerous research institutions for studies on important policy issues facing the Western Interconnection. Second, there are legitimate reasons to restrict access to Critical Energy Infrastructure Information (CEII) such as the transmission topology used in WECC's base case development process. However, reasonable steps can be taken to safeguard those concerns without imposing blanket confidentiality restrictions over the entire set of production cost model data. WECC staff offers some good first steps to identify and differentiate PCM data that should remain public versus data that warrants confidentiality restrictions.

Value of Open and Transparent PCM Data

Some historical context is instructive for understanding WECC's role in managing a PCM database. In 2006, the WECC Board of Directors approved the formation of the Transmission Expansion Planning Policy Committee (TEPPC) as a formal Board committee. The WECC Board approved a charter that specified three original functions and one of those functions was that TEPPC would oversee and maintain a public database for production cost modeling.

Over the following 11 years, TEPPC managed, refined, and improved upon the PCM data in an open and transparent stakeholder process. WECC's PCM data became a trusted and reliable source of information to stakeholders and regional planning groups in the Western Interconnection. One of the core outputs from the TEPPC study cycle was the creation of a 10-year future expected future case called the Common Case. The Common Case proved to be an extremely valuable product that served as the foundation for numerous other studies by entities that advanced the public interest. These studies examined issues such as the integration of high levels of renewables on the grid¹, the economic benefits of an energy imbalance market², the interdependence and potential vulnerabilities of the natural gas

¹ GE Energy, Western Wind and Solar Integration Study Phase 1, 2010. <http://www.nrel.gov/docs/fy10osti/47434.pdf>; National Renewable Energy Laboratory, Western Wind and Solar Integration Study Phase 2, 2013. <http://www.nrel.gov/docs/fy13osti/55588.pdf>; GE Energy, Western Wind and Solar Integration Study Phase 3, 2014. <http://www.nrel.gov/docs/fy15osti/62906.pdf>; Investigating a Higher Renewables Portfolio Standard in California, Energy and Environmental Economics, 2014.

https://ethree.com/documents/E3_Final_RPS_Report_2014_01_06_with_appendices.pdf

² National Renewable Energy Laboratory, Examination of Potential Benefits of an Energy Imbalance Market in the Western Interconnection, 2013, <https://www.nrel.gov/docs/fy13osti/57115.pdf>; Energy and Environmental Economics, Benefits Analysis of Puget Sound Energy's Participation in the ISO's Energy Imbalance Market, 2014, http://www.ethree.com/wp-content/uploads/2017/02/PugetSound-ISO_EnergyImbalanceMarket-BenefitsAnalysis.pdf.

and electric system³, a flexibility assessment of high levels of renewables in the Western Interconnection⁴, the impact of the Clean Power Plan in the Western Interconnection⁵, and the feasibility of attaining carbon reduction goals in California⁶ and the Northwest⁷.

Mitigation and Balance

WIRAB Staff recognizes that WECC has made changes to integrate PCM data with power flow data for the objective of developing roundtrip capability between the PCM models and power flow models. We believe there are reasonable steps that can be taken to protect the legitimate CEII transmission topology in the power flow models from the traditional components of PCM data.

PCM data is composed of four primary components:

1. Transmission Topology Data;
2. Load Forecast Data;
3. Resource Data; and
4. "Other Data" such as fuel prices, transmission hurdle rates, and wind and solar data

Data from categories (2), (3) and (4) are generally separable from the transmission topology and do not inherently warrant a classification as CEII. We believe that WECC staff white paper dated November 10, 2017 has suggested some reasonable steps to distinguish portions of the PCM data from other sensitive CEII data identified in category (1).

WIRAB Staff looks forward to working with WECC and other stakeholders to identify reasonable solutions to protect legitimate CEII concerns while maximizing the potential to maintain much of the PCM data in open and transparent manner consistent with WECC's historic practices and in the public interest.

³ Natural Gas Infrastructure Adequacy in the Western Interconnection: An Electric System Perspective, Phase 1 Report, 2014. https://westernenergyboard.org/wp-content/uploads/2014/03/SPSC_Ph_1_West_Gas_Elect_Report_3-17-20141.pdf and Phase 2 Report, 2014

https://westernenergyboard.org/wp-content/uploads/2014/07/E3_WIEB_Ph2_Report_full_7-28-2014.pdf

⁴ Energy and Environmental Economics, Western Interconnection Flexibility Assessment, 2015.

https://www.wecc.biz/Reliability/WECC_Flexibility_Assessment_Report_2016-01-11.pdf.

⁵ Western Electricity Coordinating Council, EPA Clean Power Plan – Phase 1 Preliminary Technical Report, 2014, [https://www.wecc.biz/layouts/15/WopiFrame.aspx?sourcedoc=/Reliability/140912_EPA-111\(d\)_Phase1_Tech-Final.pdf&action=default&DefaultItemOpen=1](https://www.wecc.biz/layouts/15/WopiFrame.aspx?sourcedoc=/Reliability/140912_EPA-111(d)_Phase1_Tech-Final.pdf&action=default&DefaultItemOpen=1)

⁶ National Renewable Energy Laboratory, Low Carbon Grid Study: Analysis of 50% Emission Reduction in California, 2016. <http://www.nrel.gov/docs/fy16osti/64884.pdf>.

⁷ Energy and Environmental Economics, Pacific Northwest Low Carbon Scenario Analysis, 2017.

https://www.ethree.com/wp-content/uploads/2018/01/E3_PGP_GHGReductionStudy_2017-12-15_FINAL.pdf.