

NRDC, WIRAB, WGG, & WRA Comments
on the Final Options for Peak Reliability's UDSA
with the Signing of the FAST Act

March 16, 2016

The Natural Resources Defense Council ("NRDC"), Western Interconnection Regional Advisory Body ("WIRAB"), Western Grid Group ("WGG"), and Western Resource Advocates ("WRA") appreciate the opportunity to submit supplemental comments on the direction Peak Reliability ("Peak") should take with its Universal Data Sharing Agreement ("UDSA") since the Fixing America's Surface Transportation Act ("FAST Act") was signed into law. We submitted a set of comments along with Vanry & Associates, Inc. on February 12, 2016.

The Peak Reliability Data Sharing Work Group has requested input on the following three revised options:

- **Option 4** would amend the Universal Data Sharing Agreement (UDSA) to delete the Peak Data Sharing Review Process, which would result in data sharing only between the UDSA signatories. This option includes a provision for the parties to revisit third party data sharing once the FERC rules are promulgated.
- **Option 4(i)** modifies Option 4 by adding the ability to share limited non-sensitive data. This includes historical Path flow data older than 6 months, BA total load, interchange, ACE and total generation (by fuel type) older than 24 hours.
- **Option 4(ii)** modifies Option 4 by providing a date by which Parties will agree on conforming the Peak Data Sharing Process to the requirements of the FERC regulations. If such agreement is not reached in a timely manner, the entire agreement will be terminated.

We recommend that the Board adopt the combination of Option 4(i) and Option 4(ii). Together, these two options constitute a reasonable path forward. Option 4(i) provides the ability to share limited non-sensitive data with third parties. Option 4(ii) provides the necessary incentive for Peak's members to revisit third-party data sharing at the conclusion of the FERC rulemaking. Without the termination clause in Option 4(ii), it is highly unlikely that 80% of Peak's Data Providers would ever agree to a new third party data sharing agreement.

The Peak Reliability Board of Directors has a responsibility to establish a reasonable third-party data sharing policy. We believe that appropriate data sharing outside of the industry is vital to the enhancement of reliability of the bulk power system, but we are concerned that if this responsibility is delegated to 80% of Peak's Data Providers, there may never be a reasonable third-party data sharing policy that promotes reliability research and development.

As organizations that represent state government and the public interest, we believe access to data and the position we are espousing here are critical to the future reliable, efficient operation of the electricity system.