



WIRAB Advice on WECC's Information Sharing Policy

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The Western Interconnection Regional Advisory Body (WIRAB) appreciates the opportunity to submit advice to the Western Electricity Coordinating Council (WECC) Board of Directors on WECC's Information Sharing Policy. In May, WECC released a revised version of the Information Sharing Policy for public comment that included, among other things, changing the categorization of Production Cost Model (PCM) data from *Public* to *Confidential* and designating PCM data as *Critical Energy Infrastructure Information* (CEII). WECC has proposed these changes because new modeling techniques, attempting to better integrate WECC's Base Cases with PCM data, now make it possible to extract CEII from the *Integrated PCM*. Unlike the PCM, WECC's Base Case has traditionally been treated as confidential and designated as CEII because it includes power flow and transmission topology information that could be used to identify vulnerable locations on the Bulk Electric System. Due to these new modeling techniques and the integration of Base Case and PCM data, power flow and transmission topology information (which is considered CEII) can now be extracted from the complete, Integrated PCM.

PCM data has long served as an important and necessary resource for universities, national labs, and other industry partners in their efforts to conduct research and analysis and to drive reliability improvements in the Western Interconnection. Under the proposed amendments to WECC's Information Sharing Policy, no PCM data would be made publicly available, resulting in an overly broad and restrictive designation of information to the detriment of planning, research, and innovation of the Bulk Power System, thereby hindering improvements to reliability.

WIRAB believes it is important to protect CEII while also sharing information as broadly as possible. With modest revisions to the proposed Information Sharing Policy amendments, WECC can implement appropriate protections for CEII, continue to support reliability improvements, and respond appropriately to comments received from stakeholders, including WIRAB, the Northwest Power and Conservation Council, the Northwest Energy Coalition, Bonneville Power Administration, and the California Energy Commission staff. Specifically, by fine tuning the proposed amendments, WECC could: 1) continue to make traditional PCM data (non-CEII) publicly available; 2) continue to implement current confidentiality protections for Base Case (CEII) information; and 3) extend new confidentiality protections to recently developed Integrated PCM data. These goals can be easily accomplished with slight revisions to subsections 2.1.5 and 2.2.3. Attached to these comments, WIRAB provides illustrative language that WIRAB will propose and discuss with the WECC Board, WECC's Governance Committee, and others. In suggesting this alternative approach to the proposed Information Sharing Policy amendments, WIRAB reinforces the value of making PCM publicly available while still fully supporting the protection of legitimate CEII information that could be accessible through the complete, Integrated PCM (i.e., power flow and detailed topology information).

With this important issue put to rest, WECC can then turn its attention to a more comprehensive review and revision of the overall Information Sharing Policy. At this time, WIRAB's primary concern with the Information Sharing Policy is not with the data categorization itself, but rather the lack of specific criteria used to appropriately categorize data, to determine a valid data request, and to determine a valid data requestor. Accordingly, WIRAB offers the following recommendations and commitment to support WECC in its efforts to further update the Information Sharing Policy.

WIRAB recommends that WECC work with stakeholders to develop criteria for categorizing information as *Public Information, Confidential Information, and Market Sensitive Information*. WECC's Information Sharing Policy currently defines how and with whom the information in each category will be shared, but does not define how data will be initially categorized. No standardized criteria or process for categorizing information is identified in the Information Sharing Policy. Data categories are simply memorialized in the Information Sharing Policy, making it unclear whether data categorization is performed by committee or WECC staff and whether the data categorization process may occur differently based upon unspecified criteria and committee or staff members present. It is important that WECC develop specific criteria that can be applied and used to systematically place all data elements into appropriate categories and to ensure that data can be appropriately designated and shared, even as subject matter experts and stakeholders change over time.

WIRAB also recommends that WECC work with stakeholders to develop criteria WECC will use to determine if a person or entity has demonstrated a legitimate need for, and ability to protect, *Confidential Information and/or Market Sensitive Information*. It is important for WECC to develop criteria that will support appropriate sharing of confidential and/or market sensitive information with viable requestors having submitted a valid request and demonstrated the ability to appropriately protect the data requested. This criteria should balance the information requestor's need for and ability to protect the information against the sensitivity of the information requested. Viable requestors should be confident that if they follow WECC's procedures, have a legitimate need, and provide the protections and information required, access will not be denied for reasons unrelated to their stated need for information.

WIRAB recommends that WECC adopt a more tailored, short-term approach to revising its Information Sharing Policy and offers its full support to WECC's longer-term efforts to comprehensively review and revise the Information Sharing Policy. WIRAB recognizes that WECC may not be ready to conduct a comprehensive review of its Information Sharing Policy at this time. WECC's proposed revisions are necessary at this time in order for WECC to no longer be in violation of its own policy. However, as noted above, PCM data has been a valuable asset for the public interest, used by numerous research institutions for studies on important policy issues facing the Western Interconnection. The proposed amendments would re-categorize all PCM data that has been integrated with WECC Base Case power flow models as confidential. WIRAB has provided a more tailored recommendation for protecting legitimate CEII transmission topology in power flow models while maximizing the potential to maintain much of the PCM data in open and transparent manner consistent with WECC's historic and current practices and in the public interest. WIRAB urges WECC to implement the specific revisions set forth in the attachment to these comments. Further, WIRAB urges WECC to work with WIRAB and other stakeholders in an effort to further improve the Information Sharing Policy; to develop an Information Sharing Policy based upon clearly articulated principles and criteria that, going forward, will better support WECC's efforts to appropriately categorize and share information in the midst of ongoing advancements in modeling techniques.

Illustrative Revisions

WECC Information Sharing Policy Sections 2.1 and 2.2—System Adequacy Planning

The purpose of these illustrative provisions is to demonstrate that it is possible to craft simple language for WECC’s Information Sharing Policy that can achieve multiple shared goals, including continued public access to non-CEII production cost model information and continued protection of power flow and transmission topology data that has always (and continues to) warrant confidentiality protections due to CEII concerns.

Finding consensus on WECC’s proposed Information Sharing Policy amendments will require careful fine-tuning of provisions set forth in Sections 2.1: *Public Information* and 2.2 *Confidential Information* and the addition of a provision that extends confidential information status to the “complete Integrated Production Cost Model”.

2.1 Public Information

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Section 2.1.5 System Adequacy Planning

-Production Cost Model cases (models and data) not integrated with power flow, detailed transmission topology or other information designated as CEII or otherwise restricted by Section 2.6.

2.2 Confidential Information

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Section 2.2.3 System Adequacy Planning

-Complete, *Integrated PCM* cases that include power flow, detailed system topology or other information designated CEII.