



## **WIRAB Advice on the WECC's Draft 2019-2021 Operating Plan**

November 19, 2018

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The Western Interconnection Regional Advisory Body (“WIRAB”) appreciates the opportunity to submit advice to the Western Electricity Coordinating Council (“WECC”) regarding WECC’s draft 2019-2021 Operating Plan. WECC’s Three-Year Operating Plan is a key document in WECC’s Strategic & Operating Planning Process; a plan that identifies activities that WECC will undertake to achieve six perennial Electric Reliability Organization (ERO) Enterprise goals and specific initiatives that WECC proposes to complete during the 2019-2021 planning period to address the WECC Board’s Near-Term Priorities.

WIRAB has reviewed the draft 2019-2021 Operating Plan and finds that, overall, the draft 2019-2021 Operating Plan is directed toward achieving WECC’s stated goals and objectives. WIRAB endorses WECC’s efforts to support the overall ERO Enterprise goals and, on June 11, 2018, WIRAB submitted comments in support of the WECC Board of Director’s Near-Term Priorities (approved in June 2018), finding that these priorities appropriately identify risk profiles that are unique to the Western Interconnection and that WECC has the ability to mitigate with near-term actions.

WIRAB has a mutual interest in ensuring a positive outcome for WECC’s Operational Plan. Therefore, seeing some opportunities to increase successful implementation of the 2019-2021 Operating Plan and to improve future planning, WIRAB offers the following advice.

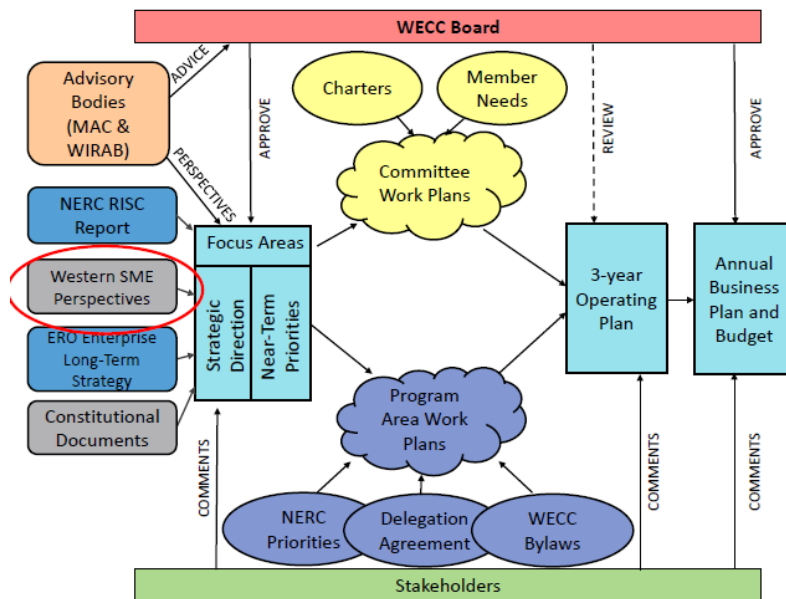
- 1. WECC should continue working to improve the implementation of its Strategic & Operating Planning Process, which provides an important framework for the development of the organization’s Three-Year Operating Plan and other key documents.**

In reviewing WECC’s draft 2019-2021 Operating Plan, WECC’s advisory bodies (i.e., WIRAB and WECC’s Member Advisory Committee (MAC)) did not have the benefit of simultaneously examining approved committee workplans and, therefore, were not able to rely upon these workplans to inform their comments. Per WECC’s Strategic & Operating Planning Process (see diagram below), it appears that the organization’s Three-Year Operating Plans will be informed by Committee and Program Area Work Plans; both of which are informed by WECC’s

Strategic Direction (approved December 2016) and WECC’s Near-Term Priorities (approved June 2018).

WECC has worked diligently, with the assistance of WIRAB, the WECC MAC, and other stakeholders to develop a robust strategic planning framework that supports WECC’s Mission to “effectively reduce risks to the reliability and security of the Western Interconnection’s Bulk Power System.” This framework builds upon an ERO-enterprise foundation and engages stakeholders in important efforts to identify reliability risks of particular significance to the Western Interconnection and adopt initiatives that address these risks where WECC is the entity best situated to make a positive change. It appears, however, that the events identified in WECC’s Strategic & Operating Planning Process have not been carried out in the prescribed sequence. WECC’s standing committees were still working to draft and/or approve their 2019-2021 Workplans when the public comment window for the organization’s draft Operating Plan opened. These Workplans are important to the development of the organization’s Three-Year Operating Plans as they outline activities each committee will pursue, identify who is responsible for these activities, specify when each activity is expected to be complete, and specify deliverables for each activity.

WIRAB supports WECC’s ongoing efforts to engage stakeholders in the implementation of a highly effective Strategic & Operating Planning Process and encourages WECC to continue working with its committees to improve the implementation of this framework.



WECC, Strategic and Operating Planning Process, slide 4 (March 2018),

**2. WECC should clarify the nexus between the WECC Specific Initiatives identified in the 2019-2021 Operating Plan and the WECC Near-Term Priorities to ensure progress is made in addressing WECC's strategic priorities.**

The draft 2019-2021 Operating Plan provides that WECC will undertake the specific initiatives outlined within the plan to address “strategic priorities (contained in the Strategic Direction Outline and Near-Term Priorities) that may not be captured in other ERO Enterprise activities.”<sup>1</sup> WIRAB supports the draft Operating Plan’s stated specific initiatives, but notes that these initiatives, as written, demonstrate a link back only to the ERO Enterprise goals and not to WECC’s Near Term Priorities. WIRAB recommends that the 2019-2021 Operating Plan be written to establish a clear nexus between WECC’s specific initiatives and the WECC Board’s Near-Term Priorities. This could be accomplished by adding parentheticals to each specific initiative, specifically linking each initiative back to the Board’s Near-Term Priorities, and by adding a comprehensive appendix to the Operating Plan that lists all of the Board’s Near-Term Priorities and the specific initiatives intended to address each.

The WECC Board’s Near-Term Priorities are important to informing WECC’s efforts and key Strategic & Operating Planning documents. By linking all of WECC’s priorities to the specific activities intended to address them, the Operating Plan will better inform the development of WECC’s Business Plan and Budget and support more effective follow-through on each initiative. This level of detail is important to engaging stakeholders and ensuring successful implementation of the Operating Plan.

**3. The WECC Board should request that WECC Management clearly identify the entity responsible for driving each specific initiative in the Operating Plan and require the responsible entity to provide a quarterly status report to ensure follow-through on WECC’s Three-Year Operating Plans and Specific Initiatives.**

WECC has worked to develop a Strategic & Operating Planning Process framework that supports WECC’s Mission to “effectively reduce risks to the reliability and security of the Western Interconnection’s Bulk Power System.” The Three-Year Operating Plan is an important document

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<sup>1</sup> The draft 2019-2021 Operating Plan also provides that WECC will undertake activities to achieve the goals of the ERO Enterprise.

in this process. Informed by the organization's Near-Term Priorities, the Operating Plan sets forth the specific initiatives that will guide staff, committee, and program area activities and inform the development of WECC's business plan and budget. It is important that WECC take steps to ensure follow through on these initiatives.

Committee Work Plans establish an important groundwork for measuring follow through and success. As noted in the draft Operating Plan, Committee Work Plans will "outline activities to be undertaken, identify who is responsible for each activity, when the activity is expected to be complete, and what the deliverables will be." Further efforts will be needed to ensure follow through and to drive success in achieving WECC's Strategic Initiatives. WIRAB continues to encourage WECC to clearly identify (in the Operating Plan) the entity responsible for driving each initiative and require that responsible entities provide the WECC Board with a status report each quarter.

WIRAB's focus is on ensuring that WECC's Strategic Planning Process drives results that align with WECC's Mission and promote the public interest. WIRAB supports the draft 2019-2021 Operating Plan and offers its support to WECC in its efforts to ensure the successful implementation of the goals and objectives stated within.