

Below is a compilation of the comments we received during the first round of comments on the SETF Straw Proposal. Names and other identifying information have been redacted.

Comment 1

Affiliation:

WECC OC, Class 3, Utility/Coop/Municipality/etc.

How likely are you to support the straw proposal?:

I support it.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
Having fewer committees allows members to focus more.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
Allows members to spend their time more efficiently
- *Ensure committee work is meaningful, timely, and relevant to current issues?*
Allows more member participation with fewer committees
- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*
Provides more control from WECC staff
- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*
Definitely

How can the straw proposal be improved?

None. I appreciate the explanation of what the straw proposal is.

Additional feedback

I think the issue with combining a market focused committee and a reliability focused committee is making sure transmission related information doesn't get shared with the marketing personnel.

Comment 2

Affiliation:

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Class 3

How likely are you to support the straw proposal?:

I can support most of the changes but would like to see a few things altered

With which elements do you have concerns?

Standing Committees

[We believe] this Straw Proposal can lend beneficial direction, structure and focus to Standing Committee work product timing and quality. We agree the details will be important but like the start. The one thing we think needs to be added up front is a commitment to provide all stakeholders opportunities to review and provide comment on work product development plans and a couple of drafts of the work products before they are approved.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
Improvement over present process
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
Depends on implementation details.
- *Ensure committee work is meaningful, timely, and relevant to current issues?*
Improvement over present process
- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*
Improvement over present process
- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*
Depends on implementation details.

How can the straw proposal be improved?

One thing we think needs to be added up front is a commitment to provide all stakeholders opportunities to review and provide comment on work product development plans and a couple of drafts of the work products before they are approved.

Comment 3

Affiliation:

WECC OC (or subgroup), Class 1

How likely are you to support the straw proposal?:

I support it.



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With which elements do you have concerns?

Standing Committees, Performance Review Board

The combination of the OC and MIC is a question in my mind. I am not sure where "Market" fits in with WECC's role as a delegated ERO entity focused on reliability. By definition, WECC should be neutral to markets. It seems that Market issues belong with FERC. Also, I am not sure that a Performance Review Board is appropriate. It seems that the standing committees or the Board can easily determine if the standing committees are completing the assignments. The standing committees are voluntary organizations, and reviewing their performance in with a dedicated group seems a little heavy handed. I could be convinced on both the market issue and the performance review issue.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
It is probably as effective as it can be.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
Not sure.
- *Ensure committee work is meaningful, timely, and relevant to current issues?*
This structure should help maintain focus on issues.
- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*
This structure should do this.
- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*
This is difficult to say. Successes will help with this.

Comment 4

In review of the Straw Proposal Elements [we provide] the following questions and comments:

1. Standing Committees: Retain RAC, disband OC and MIC and create OSMIC.
 - a. The straw proposal undermines the value provided by the OC and the MIC; there is importance of the inclusive nature of the structure. [We appreciate] the value provided in networking and sharing information that is provided by these committees and argues this structure meets guidepost 1. To remove the ability for entities to meet, build relationships, share experiences, lessons learned, and best practices would be a step backwards for reliability, essentially promoting industry silos vs collaboration.
 - b. Does combining the OC and the MIC create conflict between market and reliability priorities? Would abolishing the OC and MIC have any impact on reliability?
 - c. The proposal recommends the OSMIC be limited to a fixed number of stakeholders. The proposal does not elaborate on who/how the number of stakeholders would be



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- established. How do we ensure there is balance? Balance in stakeholder representation and subject matter expertise in order to provide the ‘meaningful work products’.
- d. Has the SEWG looked at the lessons learned from the RAC in establishing the RAC representation and stakeholder engagement.
 - e. How does limiting participation align with the guideposts established by the SEWG? Does this promote an inclusive environment where all stakeholders can share ideas and efforts with others working through similar challenges (guidepost 1). Further, does limiting participation provide an environment where all stakeholders can effectively communicate with WECC (guidepost 4)?
 - f. Although redundant, the SETF believes stakeholder engagement will be improved by focusing on the delivery of meaningful and impactful work products while limiting the ability for stakeholders to participate in committees and have input on work products. This concept should be further evaluated. For example, if the current committees (OC/MIC) focused on the delivery of meaningful and impactful work products while maintaining their inclusive nature, would it have the same impact, better impact, or less impact?
2. Performance Review Board
 - a. Will the PRB evaluate and consider performance and work products to ensure they also align with the delegated authority of WECC?
 - b. Will the PRB evaluate and consider work products to ensure limited redundancy & overlap with ERO initiatives?
 - c. There needs to be alignment with the WECC Long-Term Strategy; however, is their prioritization or consideration for the primary responsibility of WECC in its CMEP role?
 - d. The proposal states the PRB should provide guidance and leadership and be an “active” body that scrutinizes the work of the committees, but states they will meet “as needed.” It takes more than an annual performance review to actively provide guidance, leadership, and objective scrutiny.
 3. Subcommittee, work groups, and task forces
 - a. We agree consideration for certain subcommittees, work groups, and task forces to disband or go on hiatus is appropriate and needed.
 - b. More consideration should be provided on how the WECC Strategic Engagement team will provide an open and transparent forum that would promote partnerships and information sharing to further reliability.
 4. Performance and Stakeholder Engagement
 - a. Where in the proposal do the Standing Committees seek input on committee work before implementation? [We propose] metrics must be established to measure the ability for stakeholders to provide input on work products. This is especially critical if participation in the committees is limited.



Comment 5

With more details to be ironed out, the SETF straw proposal represents an excellent start to modernizing the methods and opportunities provided to stakeholders to participate.

Comment 6

Which groups fall into which category? Without knowing what groups are being discussed, the comments can't really be clear.

What are some examples of gatherings?

There is concern about how this would roll out and the lost traction for groups to transition

Can't see how membership change on OSMIC and RAC will increase participation, not having a voice seems like it might discourage rather than encourage participation.

If we disband groups that only need to create/review documents periodically, you're going to lose the continuity of that group.

WECC should have some sort of bulletin board that shares active efforts of the committees. I think this would probably fit into your 3rd workstream about sharing and receiving feedback.

Comment 7

I think the question will be, how would a forum work? Do we have any idea what a "forum" engagement would look like in terms of WECC staff support, online collaboration tools, etc.? Would we support Forums by reserving rooms at WECC and teleconferencing bridges?

Comment 8

Under element one, concerning the OSMIC Review Board, how many members will be on them?

Comment 9

Conceptually, I like the PRB. Where though will it reside? Will it be attached to an existing company structure? How will something be elevated to the PRB?

It is valuable in the next steps to rethink about accessibility; ensure that there is room for a forum and conversation prior to Board approval and that there is an ability to have an open dialogue.

The issue with the JGC is that it is a great coordinator but hasn't directed traffic. Would the PRB direct standing committees to ensure it was aligned with the organization?

Comment 10

I think, in regard to the PRB, the language that the body will actively provide feedback but will meet as needed is contradictory. Are we going to look at whether performance is aligned with delegated authorities and no overlap with ERO Enterprise to maintain efficiency?

For Element 1, there are some non-structured elements. There is value added in networking and information sharing, but with the new structure, we are losing some of those conversations and are creating siloes.

Concerning the OC and MIC – could it create reliability risks and conflicts? Is it providing meaningful work product and/or hurting participation?

Comment 11

Are we encouraging a “divorce” of the SME? We want to ensure stakeholders have a voice. If people don’t feel like they have ownership they lose interest. There are different venues for different topics, and I think that the separation will happen organically.

Comment 12

Committee participation has reduced. The value of attending these meetings needs to be made clearer. There should be an opportunity for us to engage in the important work that needs to be done for the interconnection.

This is a step in the right direction because people who want to participate and attend, will.

How though are issues identified and assigned to which committee? How can folks express their concerns to ensure their voices are heard on the committees?

Comment 13

We appreciate WECC has had a good process and has been very thoughtful.

Comment 14

I am concerned about the limitation of the membership on the PRB - who will participate? It could create an appearance that disenfranchises the membership, because if they see they are not on the committee, they will not want to participate.

Comment 15

This is a good time to evaluate work product and the amount. From the performance and stakeholder engagement perspective, if the intent is to move the networking, learning, and sharing to the WECC



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stakeholder engagement team, there would be value in a matrix for the performance. The current work product that comes out of the other work groups isn't always shared with the stakeholders, and thus there should be a metric to distribute the information from the new group to the stakeholders.

How will the process be put out for stakeholder feedback; what is the process flow?

When will there be an opportunity to provide comments on work product before it goes to PRB?

Comment 16

There are lots of opportunities to comment on the straw proposal, but they are often dispersed, and it is easy to get lost in what's due next and where to do it. The class emails are just littered with links – it would be nice to have a calendar or some other central place that has due dates for comments.

It would also be nice to be able to see what other people are commenting so we can shape our comments around what has already been said.

Also, we do not feel like we are receiving anything back when we give feedback. We would like more reception of our comments.

Comment 17

Given that the topics touch on so many different areas and some items are of interest to different committees and working groups, are we looking at how groups interact on topics? Are we looking at how best to coordinate projects when we are looking at restructuring?

Comment 18

Part of what we need is meaningful and impactful work product. Is changing the committee structure to this new form going to provide the meaningful and impactful work product we want because there is going to be new oversight over the committee structure?

Comment 19

I have heard from stakeholders that when they comment things to WECC, they don't feel their comments are taken and actually considered. Further, they feel WECC meetings aren't productive and don't act in a way to appropriately meet reliability standards. Some of the stakeholders feel disenfranchised; a group may put a lot of work into a product and then the project gets voted down in a meeting. There needs to be a way to ensure stakeholders do have a say; we shouldn't increase the independence to the point WECC is a silo.

If folks don't feel like they have the ability to influence or have ownership over something, they are going to lose interest in participating.



Comment 20

I want the interconnection as a whole to be represented better. It is concerning that we don't have further emphasis on trying to encourage people to not exit the arena.

Comment 21

Under Element 4, can you give examples of the subgroups not directly involved in standing group work development?

What is an example of shifting gatherings for discussion (bullet point under element 4)? This should be developed more plainly.

Comment 22

I am not sure how limiting the membership on the RAC and MIC/OC combo is going to increase participation. If people aren't voting they are likely going to be discouraged from participating.

Comment 23

I am curious whether all the groups currently under the OC will be placed under the RAC.

To have one group have this task rather than each group doing the task for themselves will make it more inconsistent and more chaotic. If you lose continuity, how are you going to keep things together?

Comment 24

Affiliation:

WECC MIC

How likely are you to support the straw proposal?:

I will not support it. There should be a clear plan of how the proposal will be carried out and explanation of the understood pros and cons for each element in the proposal.

With which elements do you have concerns?

All elements

If this is truly a conversation piece,

Comment 25:

Member of OC and MIC. Consultant firm.

1. Looking at the Task Force Assignment or the straw proposal itself, I cannot tell what the actual issue is that needs solving. The webinar discussion did not directly and specifically identify the



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issue either. No one on the MIC call professed to know either. I only surmise that the issue is the Board feeling that it doesn't have committed enough committee members to get useful input when it needs it and that these committees are causing trouble with no real purpose. In any case, lack of clarity around what the issue is effectively makes it impossible to suggest useful ideas for alternate solutions. It is almost as though the Board is saying it doesn't need these committees anymore. Have they outlived their usefulness? Not being direct about the problem to be solved is to me a fatal flaw. I recommend adding an explicit problem statement that is specific: what is it that has the Board of Directors unhappy?

2. Similarly, I do not understand the proposal's focus on or the reference to it in items 2 and 3 of the Task Force Assignment relating to work products. Why do the OC or MIC need to produce work products? I wonder if the purpose of the committees needs to be redefined. Is the fundamental purpose of the committees to produce analysis or work product for the Board of Directors? Or should it be to gather informal input from stakeholders on operations and market issues as they unfold? Or is it something else? If there is lack of clarity about purpose, then the Straw Proposal would be a logical place to introduce or add a statement of purpose for the committees.
3. I am unclear on why there is a concern that WECC doesn't sufficiently own the committee work product. That being said, I suggest that assigning WECC staff to lead the effort and be advised by a committee where certain members volunteer to produce certain segments is the right approach.
4. On the call today, you graciously emphasized how much WECC values the stakeholder participation and networking opportunity provided by committee membership and would like to transfer that activity to a more appropriate venue for facilitation. I cannot quite imagine what that new mechanism looks like but the appearance is that the effort is to pick and choose who will be allowed to participate on substantive issues and hustle everyone else off to be entertained in a side room where they can't bother anyone. I think it is the case that the networking value is enhanced and facilitated by substantive discussions: seeing and hearing people be thoughtful about an issue and share their perspective on it or solutions or suggestions and experience is a meaty and meaningful platform for that networking. The Straw Proposal would cut out the substantive basis for that interaction.
5. For performance metrics, I recommend two:
 - a. a survey of the Board members asking if they are satisfied with the breadth and depth of input they are getting from the committee; and
 - b. is participation as measured by individuals attending calls increasing or decreasing?
6. Who will determine membership on committees and how? Reducing the number of participants will limit participation which goes in the opposite direction I thought I was hearing that the assignment from the Board stemmed from declining participation. Or is the issue that the Board is not satisfied with who it is that is participating? Certainly, the Board could select members from some sort of application process, but I suspect some of the existing members won't bother.
7. The combined OSMIC seems way too broad a scope to allow useful participation.



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In sum, I have had the impression that these WECC committees epitomized stakeholder participation best practices. The changes embodied in the straw proposal seem exclusionary, which goes in the opposite direction of those heralded best practices.

Comment 26

Element 1: Standing Committees

- I fully support disbanding the OC and MIC and creating a new group that includes markets, operations, and security.
- In my mind, it's important to approach this as *disbanding* the existing two groups and forming a new group...i.e., it is NOT combining two groups. I believe this approach will help solidify a new mission, a new purpose, a new charter, and new goals/objectives, thus solidifying the newness of the committee.
- I truly believe that WECC should not heed any argument for keeping the OC and the MIC as separate groups. There is truly no need to do that. Market issues and operational issues are tied at the hip, so there is a natural opportunity for increased efficiencies and an improvement in the richness of discussions since all the right people will be in the same room.
- While I can support the idea of leaving the RAC alone, I believe that the RAC and all committees and task forces that roll up to the RAC might need to be reviewed.
- Regarding the limited number of members. I believe limited membership would increase participation, commitment, and accountability, and thus an improved work product. While I personally like the idea, I can understand that others don't like the message to some degree; however, I believe that any dissention can't really be supported when you look at the facts and the data. Folks don't seem to understand that ANYONE can attend OSMIC (name for now) meetings, and they can speak up and contribute the same as any bona-fide member since all of WECC's meetings are open meetings. The only thing they can't do is vote. It would be interesting to see the actual number of votes that have taken place over the last two years as a data point to show any naysayers. I'm sure that when the SETF proposed the idea of limited membership there was a list of drivers that they attempted to address via this proposal. If the SETF doesn't move forward with this specific aspect of the proposal, it might be worthwhile to document and share those drivers with the industry, along with a list of ways the proposed idea of limited membership addresses those drivers...and then solicit other alternate ideas that would address those drives equally or more effectively than limited membership idea. If a better idea comes forth and it is supported by the SETF, then go with it.

Element 2: Performance Review Board



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- I support the idea of creating a PRB and disbanding the JGC. WECC committees need more accountability. This is a very effective way of achieving that.
- I really like the proposed composition of the PRB. It is important for the WECC board to Chair the PRB, and it is also important for WECC management to be a part of it. It is obvious that members from industry need to be included as well, but WECC should be well represented.

Element 3: Standing Committee Project Management

- I fully support this aspect of the straw proposal. This is a big missing piece in existing WECC committees. I believe this alone will give us huge payback in the timeliness and levels of productivity in our committees and task forces.
- I also support the idea of having WECC SME participation in committees and task forces. This is a big part of WECC's independence.

Element 4: Subcommittee, Work Groups, and Task Forces

- In general I believe that WECC has too many committees. Not sure we have too many task forces, but I think we have too many task forces that function like committees - they don't seem to be working toward a specific work product with the objective of sunseting the task force.
- I support the idea that the continuation or termination of committees and task forces should be determined by whether or not they produce work products. As we have experienced in past attempts to reduce the number of committees, it is clear that folks generally want to keep everything the way it is. Therefore, I fully expect that nearly every committee will justify their continued existence based on the "work products" they produce. Should the SETF decide to move forward with Element 4, I'd recommend giving some thought ahead of time about what constitutes a value-added "work product" and what doesn't. Realistically, "work products" might not be so easily identified - the idea of a "work product" is probably more of a spectrum than a binary thing. The challenge for the SETF (and the PRB?) is to make a binary decision (whether a committee stays or goes) based on a spectrum of information (the spectrum of how much of a work product a "work product" actually is). That won't be easy.

Element 5: Performance and Stakeholder Metrics

- I fully support the use of metrics. But metrics are REALLY tough. Understanding what you truly want to measure is the first huge challenge, and then crafting a metric or set of metrics that actually measures it is the next huge challenge. All too often bad metrics (or even less than perfect metrics) can have unintended consequences and can actually drive wrong behaviors. Just a caution to the SETF to think long and hard about any metrics that will be employed.

Comment 27

1. Significant effect on MIC



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- a. The SETF straw proposal recommendations have a significant effect on the MIC; it disbands the Committee.
- b. The MIC members do want to comment on the proposal; however, given the timeline set forth by the SETF, the MIC is unable to provide formal comments. Hence, the MIC Chair will present general points of discussion expressed by the MIC members.

2. Timing of the straw proposal

- a. Extension of time for the comments due date: As previously noted during the SETF Straw Proposal Feedback Webinar on Oct 23rd, there was a request for an extension of time to comment. This was a noted comment by the Committee.
- b. Note: Deadlines for the initial comments make it difficult for companies to disseminate and solicit responses, as staff may not be available to address this topic in the time allotted.

3. Process being used for comments – too short

- a. SETF noted in their FAQ's, that the details of the proposal will be provided when they present their final recommendation to the WECC Board of Directors (BOD) (see below). This makes it challenging to provide comments, as interpretations for implementation could differ greatly.
- b. This precludes members from commenting on the specifics that the SETF is addressing in their proposal¹.
- c. If the SETF is seeking alternative's, then time must be afforded members to evaluate and develop alternative proposals, or to build on the existing bare bones concept to provide meaningful comments. As general comments may be useful, time is needed to provide explanation as to the context associated with each proposed change.
- d. MIC stakeholders generally agree with the request to extend the comment period.
- e. It would be helpful to members if the SETF provided background on their work to assist the members with understanding their proposal.
- f. A concern is that there will not be a second round of comments. Request to have a second round of comments. If one's planned, what is the schedule?
- g. Note: At the Oct 29th SETF meeting, the task force agreed to a second round of comments on the redline strikeout proposal they'll publish Nov. 16th, with comments then due on Dec. 4th.

4. Clarification of the proposal is needed

- a. As the SETF noted this is a barebones framework they put forth. As such, there is a great amount of interpretation required to understand what specific problem is being resolved, and how this new structure will resolve those concerns. Comments will be provided; however, those will be predicated upon the perceived structure of the proposal from each member's perspective.

¹ Reference the SETF FAQ Statement: "The Straw Proposal does not include detailed information about implementation. When will that be addressed?"

"The SETF will prepare a high-level implementation plan to present to the WECC Board of Directors with the final proposal. The SETF recognizes that the details of the implementation plan are important to stakeholders; however, the task force wanted to focus the stakeholder conversation on the end-state (potential structures) rather than the process to get there. Therefore, the SETF left those details out of the Straw Proposal."



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5. Representation (membership)

- a. What does limited membership look like? What could the structure look like (number of members), not even discussing [addressing] the representation related to the work of the committee & sub-committee?
- b. Reducing members limits resources to draw from to work on topics.
- c. Reducing members limits representation. To formulate a reasonable response, we need the structure explained.
- d. The voting structure will be different. Currently in the MIC there are 270 participants, with 151 members and 119 alternates all focused on issues before this committee. OC has 143 members and 108 alternates from Class 1 thru 5. Under the new structure, what will be the representation per class?
- e. Note: The focus for Operators, Engineers or Merchants are all different. Market issues related to all aspects are important, so voting to move an issue would then depend on the entire membership structure voting on areas outside of their expertise.
 - i. This will dilute the vote by the participants interested in MIC related activities. Market related items may drop off the agenda, and there will also be a more limited pool of members to work on the topics.

6. Topics for the Committees to address & its Subcommittees

- a. There is concern over the limited membership, as it relates to members participating.
- b. With fewer members, there are fewer stakeholders to participate in work products.
- c. The new Performance Review Board (PRB) will review everything. Concern – this may be a heavy lift as they will review and oversee all the work products.
- d. If the committees are combined, a concern is if there will there be sufficient time to address all issues.
- e. A pro of combining committees is that the participants would be able to attend the whole meeting, as there wouldn't be an overlap.
- f. What about sensitive issues? Will there be sufficient time to handle the combined work?
- g. Networking: This is a valuable concept to the members, and it's important to ensure there is at least one face-to-face meeting a year.
- h. Compare the NERC, NAESB (or any others) that WECC stakeholders participate in, to see if duplication of committees, subcommittees, work groups or task forces could be eliminated. If one of those other groups is structured to review the same material WECC is, then a concept would be, should WECC disband that group(s) to prevent duplication of work. A way to view this is to evaluate if there is no special nuance to the WECC group, relative to the other entity, then should the WECC group dissolve and the representatives could transition to the NERC group or NAESB group instead.

7. Treatment of sensitive issues by the new Committee:

- a. With the combination of committees, there may be issues (primarily operating issues) that may not be suitable for discussion with all participants. Historically, there has been some concern about certain topics being discussed with Merchant Function entities in the room. The combination of the committees forces the need for the new committee to identify how topics and participation will be managed.



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- b. Will the combination of the two committees push out issues that may otherwise get reviewed? Will market issues be ignored due to a focus on other operational issues, or vice a vera?
- 8. Current Structure:**
- a. [We] would like to provide a thorough review of the straw proposal, with potential recommendations; however, there isn't sufficient time allotted for this process.
 - b. As an alternative to the wholesale change, a comment was to continue with the existing WECC committee structure; however, work on coordination and the oversight bodies. This would keep work moving, and work to enhance the oversight groups, making them more active in each committee's process, to help coordinate work products, and merge task groups where appropriate. Work on improving the coordination within and between the committees, versus the elimination of the committees.
- 9. Posting of comments received by the SETF on its straw proposal:**
- a. It would be beneficial for SETF to post comments received. During SETF's Oct 28th meeting we hear that they were intending to do so. MIC appreciates that, as this may spark ideas for other suggestions.

Comment 28

How likely are you to support the straw proposal?:

[Entity] will not support it as currently drafted

- **[Entity] request that the SETF present a progress report to the BOD in December 2020 and continue to collaborate with WECC membership on detailed proposal, the current straw proposal could be one of the options explored**
 - [Entity] recommends specific outreach to the WECC Standing Committee Chairs
 - The OSMIC and PRB are concepts that the industry needs more detail on for the membership to be able to provide meaningful input
 - [Entity] does support the concept of increased project management and creation of metrics, both of these categories need additional detail
- **Overarching issues:**
 - [Entity] is concerned that reducing participation will decrease stakeholder engagement
 - [Entity] does not feel the proposal has enough detail for the industry to support – [Entity] feels that the proposal is more of a high level outline
 - The changes that are proposed – the industry is not clear on how those changes support encouraging or increasing industry engagement
 - The proposal does not appear to align with stated objectives
 - [Entity] is unclear on the definition and/or intent of what a “work product” is comprised of
 - Example: does it only comprise of guidelines, collection of data, approval of RAS schemes, base cases etc..
- **[Entity] would request more information on the timeline for proposed implementation**



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- [Entity] seeks clarity on the proposed work product definition
- [Entity] is concerned about the lack of standing committee engagement
- [Entity] does not see clear definition of OSMIC and PRB structure to include membership composition and governance
- Lack of explanation of how OSMIC and PRB will accommodate dual class representation
- Lack of definition and justification on limiting stakeholder participation
- Confusion on the definition of “security” and it’s role
- [Entity] requests that an outline be created to compare the functions and roles of the RAC, OC, MIC and compare to the role of the newly formed OSMIC.

With which elements do you have concerns?

Standing Committees

Performance Review Board

Standing Committee Project Management

Subcommittees, workgroups, and task forces

Performance and Stakeholder Metrics

- **Standing Committees**
 - There is a risk of rotating members too frequently. If a work product is part way through completion, some of the knowledge of the members leaving will take the background and project context with them. This requires new members to learn the background. Staggering may help with this inertia change.
 - Current Standing committees haven’t been given the opportunity to evaluate:
 - “Work products”
 - There is a lack of
 - Proposed Timeline
 - Transition plan
 - There is a lack of detail on the proposed OSMIC and PRB governance structure
 - [Entity] does not support limiting membership because
 - Broader engagement supports more diverse experience, information sharing and perspective, resulting in better work products
 - Broader membership supports an environment that fosters trust, group cohesion establishes vital relationships within the industry that is symbiotic in the overall success of the work products
- **Performance Review Board**
 - The straw proposal does not have enough detail to be appropriately evaluated by the membership. [Entity] cannot support what we do not understand.
 - PRB membership and governance structure remain unclear
 - [Entity] is unclear how the PRB will ensure a broad level of experience to cover the scope of the OC and MIC
 - [Entity] values past and current SME engagement and work products, we are concerned that the straw proposal does not provide a bridge to maintain that crucial engagement



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- **Standing Committee Project Management**
 - [Entity] supports proper project management at the committee level where needed to aid in work product success
 - [Entity] requests further information on what WECC is proposing and clear budget impact
- **Subcommittees, workgroups, and task forces**
 - Limiting membership will put a large resource burden on small number of SME's. This does not allow adequate distribution of workload across the Western Interconnection
 - SME's have commitments to their organizations
 - Limiting membership reduces succession planning and engagement
 - Frequent changes in the limited membership can create disruptions. New members must re-build the foundation of work-to-date as well as building new relationships that can slow collaboration and focus.
 - If all the work be done by WECC staff instead of the subcommittees, there would be less SME involvement, collaboration and diverse perspectives which will lead to diminished value in the end product
 - Stakeholder engagement increases utilization and 'ownership' of the products
- **Performance and Stakeholder Metrics**
 - [Entity] supports the concept
 - [Entity] would like more definition.
 - [Entity] understands that there are issues that are hard to measure quantitatively and objectively
 - [Entity] seeks stakeholder input on development of the metrics
 - Creating a work product does not necessarily make it useful

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*

[Entity] does not feel the proposed committee restructure has enough information and detail to adequately describe how it would improve harnessing expertise. The current straw proposal does the opposite of that by decreasing stakeholder engagement, decreasing continuity and over taxing a select few SME's.

- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*

[Entity] does not support the straw proposal as it is currently drafted. The current proposal lacks industry involvement. Proposing to disband committees with little transparency of the evaluation has created a level of wariness among existing productive committee members. [Entity] does not support limiting membership of committees and seeks collaboration on how to effectively meet the BOD's directive.

- **Limiting membership will put a large resource burden on small number of SME's. This does not allow adequate distribution of workload across the Western Interconnection**
 - **SME's have commitments to their organizations**



SETF Straw Proposal - Summary of Comments

- **Limiting membership reduces succession planning and engagement**
- **Limiting membership reduces diversity of perspectives and experience, which diminishes value of work products**
- **Limiting membership reduces engagement up front, which may impact willingness to engage going forward**
 - **Example:**

Because of the advantages of being on an established subcommittee, people are more likely to voluntarily participate on a project that needs to be done. If I am not on a subcommittee and WECC reaches out to me to participate on some project, I am less likely to volunteer because I do not have any idea of what I am getting into, who I will be likely working with, and how do these people function as a team
- **One aspect of collaboration, cooperation and partnership is the networking that currently occurs at committee meetings. This networking establishes relationships between utilities and with WECC that creates an environment of collaboration and trust.**

- *Ensure committee work is meaningful, timely, and relevant to current issues?*

[Entity] understands and supports the concept of being able to respond quickly to emerging issues. [Entity] supports exploring options to be able to quickly create topic specific, agile, time sensitive workgroups and/or task forces.

[Entity] looks forward to collaborating with the SETF on potential solutions.

[Entity] does not feel the current straw proposal has enough detail to support this concept as it is written.

[Entity] recommends increased collaboration with other organizations such as NERC and NATF to ensure the industry is not duplicating efforts.

- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*

[Entity] supports the goal to align committee work with WECC's mission. [Entity] does not feel the current straw proposal has adequate detail to describe how that will be accomplished.

[Entity] requests that the next draft of the proposal consider the value of increased collaboration through networking and relationship building.

[Entity] does not equate creation of work products as the only measure of success.

- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*

[Entity] recommends that standing committee chairs, MAC and WICF reach out to the stakeholders to explore why there has been a lack of engagement. Seek the stakeholders feedback on what would 'bring them back to the table'.

[Entity] believes the straw proposal does not meet the intention of increasing stakeholder engagement.

[Entity] looks forward to collaborating with the SETF on exploring options of how to seek feedback directly from the disengaged stakeholders.



Additional feedback

- **[Entity]** would like to recommend separating the controversial issues from the non-controversial issues and creating two separate work streams to continue to move both forward.
- **[Entity]** seeks to have a strong emphasis on the diverse perspectives and information sharing in the next draft.
- **[Entity]** recommends seeking stakeholder feedback on what is currently working and where there are opportunities for improvement.
- **[Entity]** recommends taking adequate time to review comments received, creating a red-line for the next draft, creating a reasonable timeline that offers time to the industry to review, seek clarification and the opportunity to provide meaningful input.
- **[Entity]** understands the BOD directive from December 2019, **[Entity]** does not interpret the directive to require a full restructuring of the existing committee structure.
- **[Entity]** supports WECC's mission to "...mitigate risks to the reliability and security of the Western Interconnection..." **[Entity]** has and seeks to be a highly engaged partner with WECC. **[Entity]** currently supports the WECC mission on over 40 committees, subcommittees, workgroups and task forces. **[Entity]** has invested a significant amount of resources driving towards the improvement and sustainment of the reliability of the Bulk Power System through our partnership and collaboration with WECC. **[Entity]** seeks to continue this long standing collaborative relationship.

Comment 29

Stakeholder engagement is critical to WECC's effective functioning as a Regional Entity. Stakeholders have long made up the committees, subcommittees, work groups and task forces through which WECC raises and considers issues, develops work products, and gathers and disseminates information. Facilitating and improving stakeholder engagement is a worthy goal, and we support that effort.

Our initial reaction to the Straw Proposal, however, is that it seems more focused on improving the timely production of work products and enhancing staff's oversight of committees and other groups. While these things may also be desirable outcomes, they are not the same thing as enhancing stakeholder engagement.

The Straw Proposal does not include detail on several important elements, including:

- How the limited membership of the Operations, Security, and Market Interface Committee ("OSMIC") will be determined.² We note that, since bifurcation, complex and contentious issues regarding representation on and membership of some committees (e.g., WECC's Nominating Committee) have taken some effort to resolve. Limiting membership on the RAC and OSMIC may also require significant time and effort to determine just how the limited membership will be assigned among WECC's diverse membership.

² Straw Proposal at page 1.



SETF Straw Proposal - Summary of Comments

- How the proposed Performance Review Board (“PRB”) will be constituted may also require significant effort to determine and negotiate,³ especially given the PRB’s proposed role in establishing committee performance and stakeholder engagement metrics.⁴
- How WECC’s Stakeholder Engagement team will manage meetings intended to share information, discuss issues, and network.⁵

By its own admission, the Straw Proposal was intended to serve as the starting point in the evolution of the project intended to enhance stakeholder engagement and to provoke discussion.⁶ We find that the Straw Proposal is, indeed, provocative enough to stimulate discussion and reaction. And while the Straw Proposal is the start, not the end of a process, we believe that this provocative proposal warrants additional discussion in a near-term time frame. **To that end, we respectfully request that WECC adjust the project timelines to allow time for the MAC to hold a workshop on this proposal around its next scheduled meeting (December 8, 2020).**⁷ Inasmuch as the MAC’s role is to advise the Board, we believe that deferring any Board discussion of this matter until after the MAC has been able to more thoroughly discuss this matter best respects the MAC’s role and will better help inform the Board’s discussion on this topic.

When the RAC was formed, WECC engaged in a measured and deliberative process to form that brand-new committee from two long-standing committees; we believe that this effort to form not only a new standing committee but to also (1) form a new Board member-chaired committee (the PRB), (2) consider limited membership for the new standing committees (RAC and OSMIC) and (3) develop a new stakeholder engagement model for those members not assigned to the limited memberships of the new standing committees, warrants a similar, measured process.

We thank WECC and the SETF for the opportunity to provide these comments on the straw proposal.

[Attachment to comment]

All,

I believe this Straw Proposal can lend beneficial direction, structure and focus to Standing Committee work product timing and quality.

³ Straw Proposal at page 3.

⁴ Straw Proposal at page 4.

⁵ Straw Proposal at page 4.

⁶ Straw Proposal at page 1.

⁷ On the MAC’s October 21, 2020 call, there was considerable support for dedicating the MAC’s December workshop to this topic, but the current timeframe for submitting comments in this process made that impossible.



SETF Straw Proposal - Summary of Comments

I agree the details will be important but I like the start. The one thing I think needs to be added up front is a commitment to provide all stakeholders opportunities to review and provide comment on work product development plans and a couple of drafts of the products before they are approved.

I will provide this comment to WECC via comment form. Thanks,

Comment 30

Affiliation:

OC, MIC, RAC, Class 1

How likely are you to support the straw proposal?:

I can support some of the changes outlined

With which elements do you have concerns?

Standing Committees

Standing Committee Project Management

Subcommittees, workgroups, and task forces

The proposed committee restructuring of OC and MIC could result in more efficiencies. However, the success of such an effort will be dependent on WECC's active engagement with member utilities and other stakeholders in a balanced representation with the proposed "limited membership".

- **With membership "limited to a fixed number of stakeholders serving staggered terms", [Entity] is concerned that adequate representation will not be acknowledged.**
- **How will the voting structure be developed? Will there be representation by class?**
- **The focus for Operators, Engineers, and Merchants vary. Operational and Market related issues are both important, so voting to move an issue would then depend on the "limited membership" in lieu of the entire stakeholder membership.**

[Entity] is concerned that combining OC and MIC may result in avoiding issues that may otherwise be reviewed (i.e. market issues may be ignored due to a primary focus on operational issues, or vice versa). The combination of OC and MIC forces the need for the new committee to identify how topics and participation will be managed.

Has SETF explored comparing the structure of NERC, NAESB, and/or other organizations that WECC stakeholders participate in, to identify duplication of committees, subcommittees, work groups and task forces prior to elimination?

How well does the proposed structure:



SETF Straw Proposal - Summary of Comments

- *Harness expertise and experience on key issues and risks to reliability?*
[Entity] supports development of staff technical expertise at WECC and recognizes that the current level of involvement in committees has been geared toward developing staff administrative experience rather than applicable technical knowledge.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
There is a need to better define the WECC staff role in relationship with technical committees. The staff technical expertise can be leveraged to guide industry SMEs, leading to the betterment of work products.
- *Ensure committee work is meaningful, timely, and relevant to current issues?*
[Entity] supports recent comments by the RAC participants that an evaluation of which studies are truly impactful work products, by providing direct value and usefulness to WECC member utilities and stakeholders, is needed as part of this review.
- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*
While recognizing the importance of the study program to the WECC Long-Term Strategy, it is equally important to recognize that the collection and processing of data in support of the study program and member utilities is a critical function of WECC and its role in supporting the reliability of the Western Interconnection.

In general, WECC study programs and assumptions have undergone a recent and continuing shift toward the goals and needs of Regulators and Policy Makers and not necessarily to the needs and system reliability requirements of member utilities. It is good to educate all involved in the decision-making processes that are impacting and supporting a reliable network; however, there must be a balance addressing member utility needs as WECC isn't sanctioned to just address policy.

- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*
There is a need to improve stakeholders' engagement at WECC and there is clearly a need to increase the value of the WECC work products to the members and stakeholders.
 - **WECC will have to work diligently on addressing the needs of member utilities equally with that required from regulators and policy makers.**

The work by the "Bulk Power System Planning Roles Task Force" (BSPRPTF), also appointed by the WECC Board of Directors, should help to clarifying the roles, responsibilities of WECC and their relationships among the Regional Planning Groups, Planning Coordinators, Transmission Planners and other stakeholders involved in Bulk Power System (BPS) planning.

The work of BSPRPTF is connected to the SETF work because both committees are looking for ways to improve stakeholder's engagement. Increased value of WECC work products to members and stakeholders is necessary to counter the perception that these have been compromised since the WECC restructuring to non-profit status.



SETF Straw Proposal - Summary of Comments

How can the straw proposal be improved?

Timeline – the straw proposal recommendations have a significant effect on OC, MIC, and existing subcommittees and task forces. Due to the aggressive proposal timeline, individual committees and subcommittees are unable to provide formal comments. The deadlines for initial comments have made it difficult to disseminate and solicit responses internally. Several requests have been made for an extension of the timeline, and while noted, the timeline has not changed.

- Additionally, [Entity] is concerned that a second round of comments is not planned prior to submitting to the BOD.

Implementation – SETF also noted that specific implementation details of the proposal will be provided when they present their final recommendation to the WECC BOD. From a stakeholder perspective, this makes it challenging to provide comments, as interpretations for implementation could differ greatly. It also precludes members from commenting on the specifics that the task force is addressing in their proposal. Stakeholders should be provided all details to provide valuable feedback.

Alternatives – If the SETF is seeking alternatives, then time must be provided to the stakeholders and existing committees to evaluate and develop alternative proposals. While general comments may be useful, sufficient time is needed to provide valuable feedback associated with each proposed change.

A key value of WECC is their access to data consistent with the FERC - NERC standards; their collection of data and databases has not been mentioned under any of the key 5 Elements Rationale for Straw Proposal.

Additional feedback

As an alternative to the wholesale change, one consideration could be to maintain the current structure and direct focus on coordination of the oversight bodies. This would keep work moving, work to enhance the oversight groups (making them more active in each committee's process), help to coordinate work products, and merge task groups where appropriate. Essentially, work on improving the coordination within and between the committees, in lieu of committee and subcommittee elimination.



Comment 31

[Entity] appreciates the opportunity to comment on the Stakeholder Engagement Task Force (SETF) Proposal that was sent out to WECC membership on Oct 19, 2020. [Entity] 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.

[Entity] 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. [Entity] 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. [Entity] 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.

[Entity] appreciates the clarifications that it received during the workshops and provides the following feedback on the proposal.

Element 1: Standing Committees

[Entity] 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. [Entity] 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.

[Entity] 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. [Entity] 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 [Entity] supports retaining the current MIC / OC structure to ensure that WECC's current MIC members are adequately represented.

SETF Straw Proposal - Summary of Comments

There are also several issues that could result from a limited membership model and [Entity] believes that SETF should consult further with WECC members about these concerns. [Entity] 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)

[Entity] 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. [Entity] 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

[Entity] 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.

[Entity] 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. [Entity] believes that the current proposal is imposing a



SETF Straw Proposal - Summary of Comments

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

[Entity] 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. [Entity] 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

[Entity] is supportive in creating metrics for evaluating areas in an organization. [Entity] 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, [Entity] 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. [Entity] 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.

Comment 32

How likely are you to support the straw proposal in its current form?

I support it

With which of the 5 elements do you have concerns (select all that apply):

Subcommittees, workgroups, and task forces

Performance and Stakeholder Metrics

Please Explain

Regarding Element 4: Subcommittee, Work Groups, and Task Forces, it would be helpful to identify subcommittees, WGs, and TFs that would not be considered directly involved in the development of



SETF Straw Proposal - Summary of Comments

Standing Committee work products to get an idea of the potential impact of the proposed changes. For instance, will the existing SMEs responsible for the development of modeling requirements and interconnection-wide base cases be directly placed into the new structure, or will those work products be discontinued? If the WECC Strategic Engagement team will manage all stakeholder gatherings as stand-alone trainings, workshops, and forums, will this increase or reduce the number of virtual/in person meetings?

Regarding Element 5: Performance and Stakeholder Metrics, the high-level description of the performance and stakeholder metrics focus on the quantity, timeliness, quality, and dissemination of the Standing Committee work. We recommend that stakeholder metrics include feedback from the stakeholders and users of the work products, e.g., through surveys, on the content, information, knowledge, presenters/speakers, meeting expectations, overall evaluation/experience, and so forth. WECC should try to measure the impact, value, significance, timing, and usefulness of its work products. It would be helpful to know what type of corrective/continuous improvement measures will be implemented based on these performance metrics, i.e., what does the Performance Review Board (PRB) plan to do with the information gained through the performance metrics?

In your opinion, how well will the proposed structure:

Harness expertise and experience on key issues and risks to reliability?

“If WECC is producing rigorous and impactful work products, the best and brightest subject matter experts will want to participate.” Work products must be meaningful, timely, relevant to current issues/users and provide value to increase SMEs’ participation.

Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?

The subject matter expertise, administrative support, and project management from WECC will be key to engage with stakeholders to improve WECC’s ownership of work products. Stakeholders need to see that their feedback is effectively addressed by the PBR and WECC staff.

Ensure committee work is meaningful, timely, and relevant to current issues?

Key factors to ensure work is meaningful, timely, and relevant include: i) the guidance and leadership direction that PRB provides to the Standing Committees based on the performance metrics and ii) ability to improve WECC’s ownership of work products.

Align committee work with WECC’s mission, long-term strategy, and Reliability Risk Priorities?

The PRB should ensure the RAC and OSMIC are delivering relevant and timely work products aligned with WECC’s mission, long-term strategy, and Reliability Risk Priorities. WECC’s project manager should communicate the organization’s goals, requirements, processes, tools, information, and capabilities and ensure these elements are aligned with the work of the group.

Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?



SETF Straw Proposal - Summary of Comments

We recommend consistent and strategic communication and managing stakeholder expectations to keep stakeholder engaged and satisfied.

What other feedback would you like to provide the Task Force?

Remove the 255-character limit on the responses for this survey.

Comment 33

Affiliation:

WECC MIC, Class 2

How likely are you to support the straw proposal?:

I will not support it. [Entity] is in support of the MIC and Class 2 MAC comments on this straw proposal.

Comment 34

Affiliation:

WECC OC, MIC, MAC, RAC, Class 2

How likely are you to support the straw proposal?:

I will not support it. [Entity] strongly recommends starting over. Please refer to MAC Class 2 and MIC Chair comments.

With which elements do you have concerns?

All. [Entity] recommends a review of all aspects be performed.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
The proposed construct will drive expertise further to other forums outside of WECC.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
The proposed structure lacks any definition of the problem(s) to be solved, it is difficult to foster improvements in this area until key objectives are defined.

How can the straw proposal be improved?

Start over, go back to key problem definition. This is not pertinent to committee structure or oversight. Solicit increased stakeholder input in development.



Comment 35

Affiliation:

WECC OC, MIC, RAC, Class 1

How likely are you to support the straw proposal?:

I can support most of the changes but would like to see a few things altered.

With which elements do you have concerns?

Subcommittees, workgroups, taskforces. Element 4 seems to be contrary to all four guiding principles at the top of the second page of the FAQ.

Comment 36

Affiliation:

Class 1; Utility/Co-op/Municipality/etc.

How likely are you to support the straw proposal?:

I support it.

With which elements do you have concerns?

Performance Review Board

Although [Entity] agrees with the purpose and goals of the proposed Performance Review Board, we would make the following recommendations.

As others have mentioned, the title would benefit from something less focused on "performance review" as that phrase carries a lot of unnecessary and inappropriate connotations. Perhaps something more focused on the intent of the group, "Committee Advisory Board".

If the taskforce is going to recommend that this new group be the clearinghouse for requests by WECC members to have specific issues addressed, that should be added to their charter.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
The new structure will allow those individuals to focus their time/expertise in the correct forum instead of having to attend multiple committees who may be discussing it from their perspective.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*



SETF Straw Proposal - Summary of Comments

By making the time and interactions spent between these two critical groups will allow both to focus on the initiatives before them and be more effective with their time and energy.

- *Ensure committee work is meaningful, timely, and relevant to current issues?*

Significant portions of the existing committees is receiving updates about the other committees' discussions. Having conversations once with all interested parties and the necessary SMEs is more effective and will better value members' time.

- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*

Making all committee work focused on WECC's priorities is essential to its success and its members.

- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*

By separating out the committees from the education and networking opportunities allows individuals to engage at the level and means they desire.

How can the straw proposal be improved?

As mentioned previously and be other comments, WECC and these committees must provide adequate and timely opportunities for interested parties to be informed of initiatives and provide feedback.

Additional feedback

WECC should also build in opportunities for members to express ideas and concerns that go above and beyond a "Public Comment" agenda item. Ideally this would be a metric of the PRB.

Comment 37

Affiliation:

WECC OC, MIC, RAC, Class 1

How likely are you to support the straw proposal?:

I can support most of the changes but would like to see a few things altered.

With which elements do you have concerns?

Subcommittees, workgroups, and task forces

Element 4 seems to be contrary to all four guiding principles at the top of the second page of the FAQ.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*

Without subcommittee, it would be harder to meet the goals.



SETF Straw Proposal - Summary of Comments

- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*
No comment.
- *Ensure committee work is meaningful, timely, and relevant to current issues?*
Fully agree with the statement.
- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*
Fully agree with the statement.
- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*
Fully agree with the statement.

How can the straw proposal be improved?

By realigning element 4 with the guiding principles.

Additional feedback

We support the org change process; needs realigning the existing process; no additional comments.

Comment 38

Affiliation:

WECC OC

How likely are you to support the straw proposal?:

I will not support it

A surgical approach to restructuring as opposed to a sweeping approach that did not consider the points I will make below.

With which elements do you have concerns?

Subcommittees, workgroups, and task forces

Performance and Stakeholder Metrics

The replacement of workgroups and subcommittees with task forces, when deemed necessary.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*
Ability to effectively alleviate risk and ensure reliability in a timely manner fails. Lacks continuity among experts when technology changes are constant, it assumes coordination only needs to occur via a task force when a problem is identified.
- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*



SETF Straw Proposal - Summary of Comments

It won't foster engagement any better than existing structure. Look at group effectiveness independently, not a sweeping decision that all groups require restructuring. WECC will find difficulty engaging and getting support from stakeholders with this.

- *Ensure committee work is meaningful, timely, and relevant to current issues?*

It will not ensure meaningful work is accomplished in time or is relevant to current issues with the start and stop approach rather than a continuous approach. Work plans for groups should be developed from the bottom up, not just from the top down.

- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*

SETF did not take a surgical approach on what works very well and eliminate what doesn't, the sweeping change to structure hinders both effectiveness and efficiency. Priorities need to remain on grid operations/reliability, not insulation from legal risk.

- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*

Excitement and engagement varies by group. Engage with stakeholders to see why they are not excited or participating. They are not going to participate in something where their time investment is not paying dividends. Time spent needs to be of value.

How can the straw proposal be improved?

Re-evaluate dismantling of groups, keep productive ones in place. To disband all groups is counterproductive and will hinder WECC's ability to deliver on its mission. Many groups provide valuable info and resources, allowing members to benefit greatly.

Additional feedback

Groups I participate on create and maintain guidelines and criterion used by WECC members regularly. These documents are referred to by member organizations as the standard to perform work internally. The structure change would effectively eliminate this.

Comment 39

Affiliation:

WECC RAC, Class 3

How likely are you to support the straw proposal?:

I can support some of the changes outlined

With which elements do you have concerns?

Standing Committees: - Standing Committees being formed of stakeholder representatives. This seems similar to what was implemented in the RAC Governance structure. The RAC had difficulty getting regular representations from some classes and in our assessment it hampered stakeholder engagement. The present RAC model of Subcommittee Chairs



SETF Straw Proposal - Summary of Comments

guiding the RAC is working well. The full body of the RAC and each subcommittee make decisions which encourages stakeholder participation.

Performance Review Board: First, it should not be named a board as it will cause confusion. Second, it should not be chaired by a board director. Directors should not be actively involved in performance reviews. Third, I do not know what stakeholder leadership is but I believe the Standing Committee chairs and MAC chairs working with WECC management would be the right makeup of the performance review committee.

Subcommittees, workgroups, and task forces: there are important WECC work products that are not identified in the long-term strategy or risk priorities. Be careful about being overly myopic.

How well does the proposed structure:

- *Harness expertise and experience on key issues and risks to reliability?*

Not sure.

- *Foster collaboration, cooperation, and partnership between WECC staff and stakeholders?*

Partnership with WECC may be improved.

- *Ensure committee work is meaningful, timely, and relevant to current issues?*

Project management should help the committees deliver content timely

- *Align committee work with WECC's mission, long-term strategy, and Reliability Risk Priorities?*

This alignment is useful but there are other valuable product that should not be discounted.

- *Rekindle stakeholder excitement to engage with colleagues to address critical reliability issues?*

Not sure.

How can the straw proposal be improved?

See comments provided.

Additional feedback

I would be glad to provide more detail about important RAC work products or issues of structure.

Comment 40:

Some clarity on the "value proposition" of the entire proposal would be helpful. Some facts/concerns to validate?

I am fine with the overall concept and the need to better integrate the work for stakeholder engagement and dissolve JGC?! I do urge the SETF team to think more about the role of "Performance Review Board" in terms of its operational scope and also how it would engage on reviewing the work done by different committees. I also have some concerns with the name as it sounds



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elitist/authoritative/auditing like” over maybe one that is intended at being “issue-driven and focused on reviewing the outcomes” for future improvement.

Also, the benchmarks by the PRB in terms of its work seems to be a bit in conflict with the over-arching goals of the PRB. Will it be a more hands-on group to review stuff? Will it be able to look at “multi-disciplinary aspects of reliability” if an issue warrants it? But the existing committees didn’t think of partnering?

