WECC’s General Response to Comments

WECC appreciates the time entities have taken to comment on the Information Reporting Policy (IRP) and the Information Sharing Policy (ISP), both on the specific changes being proposed and on the revision process. WECC is providing commenters the information they requested and has made many changes to the policies in response to comments, including to the processes WECC will use to make future changes.

WECC has also:

- Removed all terms associated with data categorization and sharing from the IRP and included them in the ISP, which is more appropriate for the scopes of these two policies; and
- Removed “generation and substation GIS data” and “common case transmission assumption GIS data” from the ISP because WECC no longer shares this information.

WECC will continue to accept comments until the policies are posted for the approval of the Governance Committee and Board of Directors in June.

BC Hydro

General Comment on Changes to the Policies

At this time, BC Hydro does not support the revisions put forth because BC Hydro does not believe that adequate information on the rationale and reasons for these changes was presented to WECC Members with respect to the reasons for removing certain provisions and the changes in what data will be collected as well as the changes made to sharing categorizations from non-public to public. BC Hydro notes that WECC has only provided a summary of the proposed changes to the policies, which provide a high-level description of changes, but does not provide adequate reasons and rationale for WECC members. Accordingly, BC Hydro requests that presentations be made in this regard by WECC staff to the Member Advisory Committee at its January 29 meeting, and to the Standing Committee meetings from February 19-21, and that the time period for comments by members be extended until after this engagement has been completed.

The IRP was due for its two-year review and is an old policy that has changed little over the years, so WECC took a fresh look at the policy to see how it could better meet the needs of WECC and its Members. WECC proposed revisions to simplify the policy and collections process, to recognize that
WECC began collecting transfer limits, and to recategorize as “public” certain information that WECC does not believe is market sensitive.

The changes to the ISP were due to WECC’s changes to the IRP, a recommendation on GIG and RAS models from the Data Subcommittee under the Reliability Assessment Committee, and the need to categorize short-circuit models.

Additional rationale supporting these changes is provided throughout this response to comments. WECC will provide presentations to committees as they request them and will accept comments on the policies until they are posted for Board approval.

In addition, below are some additional specific comments on the policies as follows:

Information Reporting Policy (IRP)

“2. Determining Information Reporting Requirements”

BC Hydro notes that WECC has removed some provisions from the IRP, including section 4.2 “Avoiding Conflict with Existing Regulatory/Contractual Obligations”. BC Hydro suggests that the IRP be revised to include that WECC staff will consider these factors in the development of the reporting requirement Exhibits. BC Hydro suggests that in Section 2 – after the new “taking into consideration the burden of Members,” the following be added, “and making reasonable efforts to avoid imposing obligations under this policy that conflict with Members’ existing regulatory or contractual obligations.”

WECC has added the requested language.

In addition, BC Hydro recommends some commentary to members on the Board governance role in approving the IRP and its Exhibits consistent with section 4.6.11 of the By-Laws, as the proposed changes to the IRP provide that changes to the Exhibits are developed by WECC staff and will be effective when approved by the WECC CEO – without Board approval. BC Hydro believes that further rationale and explanation is required for WECC membership regarding this change.

These changes provide a more efficient policy revision process that only requires the Board’s time and attention when necessary (i.e., upon appeal). The Board will continue to govern the IRP and its Exhibits by continuing to approve changes to the IRP and considering appeals of Exhibits.

“4. Protection and Sharing”

WECC staff is making the determination of the applicable Information Access Category (i.e. public – non public), and any disputes will also be resolved by WECC staff. There is no guidance provided in the policy for the procedure WECC staff will follow to make its determination with respect to disputes about applicable Information Access Categories. BC Hydro suggests that the WECC staff process for resolving disputes about Information Access Categories be included in section 4 of the IRP.
As with the ISP, WECC has added language to the IRP stating that appeals will follow a process similar to Section 1503.5 of the NERC Rules of Procedure.

New data collected and changes in categorization – Exhibit A

WECC is proposing changes to Exhibit A – Loads and Resources Data to update the data collected by WECC and to change sharing categorizations, however, BC Hydro does not believe that the WECC membership, Standing Committees or Member Advisory Committee were provided with a presentation with respect to the rationale for the proposed categorizations changes from non-public to public and where this information will be contained at WECC. BC Hydro believes this stakeholder engagement should be completed before comments are solicited.

WECC is already collecting transfer limits and is simply updating the Exhibit accordingly. The rationale for the proposed changes to categorization is that WECC does not believe this data is market sensitive. WECC will provide presentations to committees as they request them and will accept comments on the policy until they are posted for Board approval.

In addition BC Hydro would like a clear understanding of the specific data that is included in the proposed collection of “transfer limits” that WECC is proposing to begin collecting and make public in order to adequately assess this provision. WECC should provide an appropriate definition of “Transfer Limits” and it should be developed with and agreed upon by WECC membership.

As stated above, WECC is already collecting transfer limits and is simply updating the Exhibit accordingly. WECC has revised the term in the proposed changes from “transfer limits” to “Transfer Capability,” which is defined in the WECC 2020 Loads and Resources Data Collection Manual.

Once the rationale has been provided for the proposed changes in categorizations for the data collected, BC Hydro will be in a better position to assess whether it has any comments with respect to whether the data below should be public.

- Actual historic hourly wind, solar and hydro generation (aggregated at the BA level);
- Transfer limits; and
- Actual year hourly demand data.

As stated above, WECC is proposing to recategorize this data as “public” because WECC does not believe it is market sensitive.

Information Sharing Policy (ISP)

WECC is proposing changes that allow staff to change the categorization of data (as public, confidential, etc.) without Board approval, while explicitly preserving in the policy notice to Submitting Entities, the opportunity for them to comment, and the ability to appeal to the Board, all
prior to staff’s implementation of the change(s). BC Hydro believes that further rationale and explanation is required for WECC membership regarding this change.

This change provides a more efficient policy revision process that only requires the Board’s time and attention when necessary (i.e., upon appeal).

In addition to the Loads and Resources changes described above, WECC is also proposing the following changes to sharing categorizations:

- Geomagnetic Induced Current and Remedial Action Scheme models – Confidential (CEII) - Removing restriction that they be shared only with NERC Registered Entities
- Short circuit models – Confidential (CEII)
- Universal Data Sharing Agreement (UDSA) changed to Western Interconnection Data Sharing Agreement (WIDSA)

BC Hydro’s comments to the IRP information sharing and categorization above are also applicable to the ISP with respect to BC Hydro’s ability to assess the changes in sharing categorizations made to sections 2.1.2, 2.2.2, and 2.3.1.

The change to how WECC shares GIC and RAS models was requested by the Data Subcommittee under the Reliability Assessment Committee (RAC) to simplify the model-sharing process. This change was discussed by the RAC on multiple occasions. The Data Subcommittee and WECC staff believe the protections put in place to protect CEII are adequate and do not believe that GIC and RAS models need extra protection.

WECC recently began collecting short-circuit models and added them to the ISP as CEII. This approach is consistent with discussions held at multiple committee meetings (the Modeling Subcommittee under the Reliability Assessment Committee and the Short Circuit Modeling Working Group and at the Relay Work Group under the Operating Committee).

“2.4 Western Interconnection Data Sharing Agreement (WIDSA)

Please add to the start of this section ”Notwithstanding anything to the contrary contained in this policy” - so that section 3.3 does not inadvertently override the WIDSA terms.

WECC has added the requested language.

“2.5. Information Not Shared”

Information that will not be shared outside of the ERO enterprise (NERC and regional entities). BC Hydro notes that the WECC CEO can approve exceptions allowing the sharing of this data unless otherwise prohibited. BC Hydro expects that the sharing of any British Columbia (Non-US) entity compliance information with third parties without consent would be prohibited. Given that section 2.5 Information Not Shared categorization may contain BC registered entity compliance data, BC Hydro
suggested that ISP be revised to provide that the WECC CEO must have the consent from the [non-US entity] or [entity or member] that provided the information prior to sharing this information.

The sharing of non-U.S. entity information in violation of its agreements with those entities would be prohibited. WECC has added the requested language.

3.11 - Categorization Changes

BC Hydro notes that the changes to the ISP provide that WECC staff may categorize or change the categorization without Board approval, and that WECC staff determine any disputes. No process is set out for how the dispute resolution process will be conducted. BC Hydro suggests that the WECC staff process for resolving disputes be included in section 3.11 of the ISP.

WECC has changed the policy so that disputes regarding the categorization of information will be addressed under Section 4 – Dispute Resolution and will follow a process similar to Section 1503.5 of the NERC Rules of Procedure.

Housekeeping edits

Section 1.4 – Review Cycle - Is the second paragraph in section 1.4 an internal drafting note?
Yes, thank you.

Section 3.1 – In the fourth line – “UDSA” – should be changed to “WIDSA.”
Yes, thank you.

BC Ministry of Energy

WECC has requested comments on the proposed changes to its information sharing and information reporting policies. British Columbia has concerns around the process that WECC has followed to bring these changes forward and the level of detail it has provided to its members in advance of giving feedback. Our concern is that WECC has not offered a clear rationale for why the existing policies need to be altered. In addition, the scope and impact of the changes are unclear (for example, the additional data requirement that WECC is proposing to collect, “transfer limits”, is not defined). As a result of not having sufficient information to make an informed decision, BC is not supportive of the recommended changes. WECC must to provide more detailed information to the MAC and its standing committees on what information is being requested and why it is needed and provide additional time for comment.

WECC followed the policy revision process set forth in the policy. WECC is providing the reasons and rationale for the changes in this response to comments. WECC has replaced the term “transfer limits” in the proposed changes with “Transfer Capability,” which is defined in the WECC 2020 Loads and Resources Data Collection Manual. WECC will provide presentations to committees as they request
them and will continue to accept comments on the proposed changes until they are posted for Board approval.

**Colorado Springs Utilities**

UDSA should be WIDSA in Section 3.1 of the Information Sharing Policy

WECC has made this change.

An inconsistency (compare redlines in 1.3 of the Information Reporting Policy to the lack of matching redlines in 1.3 of the Information Sharing Policy

WECC has made these changes.

**El Paso Electric Company**

EPE opposes expanded sharing of models proposed within the Information Sharing Policy (to include, for example, RAS and short circuit models), because the expansion of model sharing is not accompanied by any strengthening to the "legitimate need" threshold used by WECC for permitting access to such information. Category (ii) of the legitimate need threshold in Section 3.7 requires the requester to simply represent that it wants the models for "analysis." On its face, an individual seeking access to models for the purpose of analyzing them in order to harm operators and users of the regional or interconnection-wide electric grid would qualify under the "legitimate need" test, even though the models, themselves, qualify for designation as CUI/CEII under FERC's rules.

Further, it is EPE's understanding that the substantial majority of requests for data access are granted by WECC, such that the result is that access is widely permitted. Since the legitimate need threshold is not being proposed for strengthening, EPE strongly opposes any expansion of the sharing of models that could be used to do harm to the electric grid. If Category (ii) of the legitimate need threshold in Section 3.7 had been proposed for elimination in the draft, EPE may have been more open to considering an expanded scope of model sharing. Any expansion of sharing should be accompanied by strengthening in the legitimate need test and greater rigor of evaluation of need.

The definition of “Legitimate Need” in the policy was taken from the definition of “Permitted Purposes” in the UDSA/WIDSA, to which EPE and all RCs, BAs, and TOPs in the Western Interconnection are signatories. WECC collects information from all requesters to evaluate who they are and their proposed need to prevent information from being used for malicious purposes.

EPE's comments on the proposed changes to the WECC Information Reporting Policy:

EPE opposes the removal of Section 4.2 of the WECC Information Reporting Policy, because removal would eliminate the obligation of WECC to make reasonable efforts to avoid imposing obligations that conflict with existing regulatory obligations. WECC should be obligated to make reasonable efforts to
avoid imposing obligations that conflict with FERC or other regulatory requirements. Members should expect at least that much from WECC, its staff and governing board.

**WECC has added language to the policy to specify that WECC will make reasonable efforts to avoid imposing obligations under the policy that conflict with Members’ existing regulatory or contractual obligations.**

In addition, EPE opposes the proposed sharing, as public, transfer limits, actual hourly demand, and actual historic hourly wind & solar generation data. Transfer limits are properly considered CEII, because access to transfer limits could aid in a bad actor’s pursuit and implementation of harm to the grid. Should WECC make it publicly available, WECC would be acting contrary to the federal definition and treatment of such data, as non-public. This inconsistency also illustrates the problem with the proposed removal of Section 4.2, for the reasons identified above. Finally, with respect to the proposed changes to begin sharing, as public, hourly demand data and historic hourly wind and solar generation data, EPE opposes these changes, because they would not serve any reliability purpose. Further, there is no justification presented to support such a change.

**WECC does not believe transfer limits are CEII. WECC has replaced the term “transfer limits” in the proposed changes with “Transfer Capability,” which is defined in the WECC 2020 Loads and Resources Data Collection Manual. WECC does not believe this Transfer Capability would be useful to someone planning an attack on critical infrastructure. EPE offers no support for its contention that this data could help a bad actor harm the grid.**

**WECC is proposing to share hourly demand and renewable data publicly because it does not believe this data is market sensitive. The public availability of this data serves a WECC reliability purpose of making this data available for public reliability assessments that WECC performs. The public availability of this data may also serve other reliability purposes for other entities.**

**PacifiCorp**

Section 1.3 “Scope” of the Information Reporting Policy”, Not sure why “WECC” was removed before “employees” because it is unclear what employees are being referring to now.

“WECC” was removed from in front of employees, the Board of Directors, and Members because, given this is a “WECC” policy, it is implied that it applies, and it can only apply to, “WECC” employees, the “WECC” Board of Directors, and “WECC” Members, so it does not need to be explicitly stated. The edits were proposed to remove redundancy.

In 1.3, why does this policy no longer apply to WECC contractors? This must have been an intentional deletion, it should be explained.
As with the corporate policies of any corporation, WECC corporate policies are not intended to apply to, nor are they in any way enforceable against, all WECC contractors. Contractors will be made subject to policies or specific terms from those policies as necessary through contracts.

Under Section 2 of the Information Reporting Policy”, WECC Staff will develop exhibits for reporting requirements which consider the burden to Members, but Section 4.1 regarding avoiding burdensome requirements on Members was removed.

Section 4.1 was deleted because such extensive terms are unnecessary and to simplify the policy. The simple requirement that WECC consider the burden to members was moved to Section 2 so it was not lost.

Section 2.1.2, bullet #3, suggest changing the “BA” reference to “BAA for example PAC would submit all of PacifiCorp as the BA (Balancing Authority) and not by the individual BAA (Balancing Authority Area) (PACE or PACW).

WECC has changed the language to specify it is “aggregated at the BA or BA-area level.”

Section 3.3 “Presumption” of the Information Reporting Policy”, presumption in favor of requests for information being reasonable when Petitions for Relief are presented was removed. This seems to increase the chances that Petitions for Relief will granted.

WECC deleted Section 3.3 because presumptions (used to create evidentiary hurdles) and precedents are a level of process not needed in this policy. WECC will consider all the circumstances, including the presumed need for information and reasonableness of the request, in deciding whether to grant a petition for relief.

In 3.11, WECC “may” treat public information as confidential during an appeal to the board. It would be better if WECC was required to treat that information as confidential until an appealing party has been heard. Further, what if information is already confidential, and WECC Staff has decided to reclassify it as public? It’s not clear that this language would apply if the classification change went that way.

WECC has revised the language to require that it treat as confidential any public information it proposes for recategorization as confidential during the recategorization process. This provision is not intended to apply, and on its face does not apply, to information that is already confidential. Information that is already confidential must continue to be treated as such until it is determined to no longer be so.

Portland General Electric

Portland General Electric Company (PGE) hereby submits comments to WECC concerning recent proposed changes to the WECC Information Reporting Policy and WECC Information Sharing Policy. PGE respectfully requests WECC to provide the justification for the requested information,
specifically what the data will be used for, and how such information will be made available to the public. If WECC clearly demonstrates a need for such data, PGE suggests WECC utilize already publicly available data for: actual hourly wind, solar and hydro generation (aggregated at the BA level); actual year hourly demand and; transfer limits. The United States Energy Information Administration (EIA) already collects this data via Form EIA-930 and publishes the data on their public website.

Form EIA-930 data collection provides a centralized and comprehensive source for hourly operating data about the high-voltage bulk electric power grid in the lower 48 states. The data is collected from the Balancing Authority Areas (BAs) that operate the grid. PGE is one of the many BAs in WECC that submit data to the EIA via Form EIA-930.

The EIA-930 contains the following hourly data elements:
https://www.eia.gov/beta/electricity/gridmonitor/about

- Demand
- Demand by subregion
- Demand forecast
- Net Generation
- Net generation by energy source
- Total net interchange
- Interchange with directly interconnected BAs

WECC utilizing already publicly available information mitigates the administrative burden of collecting and transmitting the same data to multiple entities, as well as ensures data consistency across multiple forums.

PGE appreciates WECC’s willingness to engage with its members about the proposed modification to the WECC Information Reporting Policy and WECC Information Sharing Policy. PGE appreciates the opportunity to submit these comments and looks forward to working with WECC on this issue.

WECC is not requesting any new data that it does not already collect, but is updating the IRP to reflect its current collection of transfer limits. WECC has replaced the term “transfer limits” in the proposed changes from to “Transfer Capability,” which is defined in the WECC 2020 Loads and Resources Data Collection Manual. WECC uses the Transfer Capability in its zonal model to limit or cap the amount of surplus supply that can be moved from one area to another to balance the system. WECC does and will continue to investigate using EIA data for its reliability assessments, including the specific suggestions made by Portland General Electric.
Powerex

Powerex appreciates the opportunity to comment on the proposed changes to the Information Sharing Policy and Information Reporting Policy that were published on December 17th, 2019. At this time, Powerex does not support the revisions put forth, and agrees with the concerns that have been expressed by BC Hydro in their comments. Powerex believes that WECC staff should undertake further consultations and stakeholder engagement with WECC members through the Standing Committees and Member Advisory Committee. WECC staff should also provide reasons and rationale regarding the changes to the committees and subsequently open up another comment period after those consultations. The consultation with WECC Members and final comment period should be completed before this topic is presented to the WECC Board.

Please see WECC’s responses to BC Hydro’s comments. WECC is providing the reasons and rationale for the changes in this response to comments. WECC will provide presentations to committees as they request them and will continue to accept comments on the proposed changes until they are posted for Board approval.

Puget Sound Energy

PSE opposes several of the proposed changes. PSE is in opposition because the proposed changes differ from WECC’s otherwise stated intention of sharing protected information, negate utilities’ rights to protect their own CEII, unnecessarily escalates security risks, and overburdens the study process.

First, the body of the notice says that WECC’s proposal is to include RAS and GIC data in the base cases—this intent is not within the Sharing Policy’s redline. Currently, WECC stores RAS and GIC data within a separate database, which requires separate approval and an NDA for a third-party to access. Without being within the redline proposal, WECC’s proposed revisions are misleading. And action taken to put the information within base cases after the redlines are approved would be outside the policy’s scope since the policy implies that such sharing is to be determined on a case-by-case basis.

WECC’s Data Subcommittee under the Reliability Assessment Committee (RAC) requested this change. Changing the ISP categorization or treatment of GIC and RAS models does not require or necessarily mean that these models are included directly in base cases. While this may or may not happen, WECC believes the wording of the proposed revision is enough to notify stakeholders that base cases may “include” GIC and RAS models. These concerns should be shared and discussed at the Data Subcommittee.

Second, NERC Rule of Procedure Section 1503(3) requires WECC to give utilities notice and an opportunity to object anytime WECC receives a request for utility-owned CEII within its possession. WECC itself defines RAS and GIC data as CEII. By including RAS and GIC data within the base cases, WECC is negating utilities’ rights to notice and comment. At a minimum, WECC is creating a system where it and utilities will continuously need to be engaged in extraordinary CEII evaluations every
time an entity makes a base case request, regardless of whether that entity even wants the RAS and GIC information.

WECC is applying Section 1503.3 of the NERC Rules of Procedure through the ISP and its approval processes. The policy and WECC’s communications to Submitting Entities during the approval process constitute the required notice to Submitting Entities. Submitting Entities are also given an opportunity to comment during the policy approval process.

Third, including RAS data in the WECC base cases is a security problem. The RAS data tells people where the system is weak and what causes those weaknesses. With the emphasis on how vulnerable the grid is to cyber (and other) attacks, sharing this information without a specific CEII request, evaluation, and NDA is not prudent.

The ISP categorizes base cases as CEII and all requests for base cases are treated as CEII requests, including evaluation by WECC and an NDA. However, changing the ISP categorization or treatment of RAS models does not require or necessarily mean that these models are included directly in base cases. These concerns should be shared and discussed at the Data Subcommittee.

Fourth, including GIC data as part of the base case review process could degrade the quality of the data. WECC is aware that utilities are already struggling to keep up with the case reviews, so it is not reasonable to add another item to the list of things to review for each base case. Although it is possible that the GIC data will not be given enough attention during the case review process, utilities are already short on time for these reviews, and the NERC quality metrics and overall quality of the base cases are not likely improve with this addition.

WECC is requesting updates to the GIC data on an annual basis, which is unlikely to change unless a need arises. While including the GIC data in base cases would be more data and added complexity, WECC expects that its inclusion in the base cases would decrease duplicated data and increase the accuracy of the GIC data for the annual update. Regardless, changing the ISP categorization or treatment of GIC models does not require or necessarily mean that these models are included directly in base cases. These concerns should be shared and discussed at the Data Subcommittee.

Fifth, changes to section 4, “Sharing and Protection”, removes the ability of WECC members to effectively address concerns with future changes to the policy. The policy should still require WECC staff to provide justification for changes, in addition to a comment period, and provide for a separate dispute resolution process that is not also governed by WECC staff. Allowing WECC staff to dictate changes and also to resolve disputes concerning those changes creates a conflict of interest.

WECC has removed all terms associated with data sharing and categorization from the IRP and included them in the ISP, which is more appropriate for the scopes of these two policies. WECC has revised the process in the ISP to include WECC’s posting of the reasons and rationale for the changes and to include additional committees to be notified.
The policy, as revised, protects Members’ ability to address their concerns by posting of the proposed categorization change (including the reasons and rationale for the change), notice to applicable entities and committees, a comment period, and the ability to appeal, including to the Board of Directors.

Lastly, two of the changes to section 2.1 concerning hourly data could cause SOC concerns. The actual hourly renewable data has historically been considered market sensitive information and not to be shared with Marketing Function Employees (MFEs). Allowing actual hourly demand data to be made available to WECC entities only before being made publicly available may be construed as violations of the unfair treatment and no conduit rules.

Hourly renewable data—WECC does not believe this information is market sensitive. No commenter has given any explanation or justification for treating it as such.

Hourly demand data—This data would not be available only to WECC entities before being made publicly available by WECC. Instead, this information would be publicly available to any requestor upon collection by WECC.

Puget Sound Energy has not provided any support for the contention that these changes may be a violation of the FERC Standards of Conduct, including the No Conduit Rule.

Southern California Edison

The purpose of this email is to provide a response to the subject document regarding sharing Geomagnetic Induced Current data. SCE had previously expressed concern on providing this information in the base cases. The concern is that providing this information could result in identifying locations of SCE’s transmission facilities. As a result of identifying these locations, it could result in security risks of critical infrastructures.

WECC collects information from all requesters to evaluate who they are and their proposed need to prevent information from being used for malicious purposes.

Tri-State Generation and Transmission Association

Information Reporting Policy

Exhibit A – Loads and Resources Data; Section B. Identification of Data Collected

Data Listed as required in this Exhibit will be identified more specifically, including additional generator and path specifications, in the “WECC Data Collection Manual” that is approved annually by WECC. Comment: Please include the responsible party at WECC for its approval.

The Data Collection Manual is not formally approved by any responsible party; it is reviewed, updated and provided annually by WECC staff. The language has been updated to remove the reference to “approval.”
Information Sharing Policy

2.1.4: Even though this information appears to have been included in a past policy and is not posted on the public portion of the WECC website, due to concerns with possible nefarious intentions by individuals / groups, Tri-State does not think principal transmission and planned facilities maps nor latitude, longitude and two-dimensional data should be posted with access by just having a UN and PW.

WECC does not share the principal transmission and planned facilities maps with all who have a username and password to the WECC website. WECC shares this information only with WECC Members or others who have been vetted and approved by WECC.

WECC only shares latitude, longitude, line, and two-dimensional data related to the principal transmission and planned facilities maps. As stated above, WECC does not share this information with all who have a username and password to the WECC website. WECC shares this information only with WECC Members or others who have been vetted and approved by WECC.

2.1.5: Even though this information appears to have been included in a past policy and is not posted on the public portion of the WECC website, due to concerns with possible nefarious intentions by individuals / groups, Tri-State does not think Production Cost Models and data not integrated with power flow, detailed transmission topology or other restricted information and Generation and substation Geographic Information System (GIS) data should be under Public Information. There is no reason to make life easy for bad actors.

WECC does not believe that production cost model information (that does not include power flow, detailed transmission topology, or other restricted information) is sensitive in any way or useful to a person planning an attack on critical infrastructure. Making this information publicly available promotes reliability by facilitating its use in a wider variety of forums and by increasing transparency.

WECC is removing “generation and substation GIS data” and “common case transmission assumption GIS data” from the ISP because WECC does not share this information.

2.5: Information not Shared introductory paragraph: Please add that a signed Non-Disclosure Agreement by the entity desiring the information would have to be in place and notice to the owners of the information would be provided prior to any information being provided.

WECC has added these requirements.

3.1: UDSA in the fourth line down should be changed to WISDA.

WECC has made this change.

Western Interconnection Regional Advisory Body

WECC appreciates WIRAB’s supportive comments.
WECC should include a provision in the Information Sharing and Reporting Policies requiring that WECC staff inform the Governance Committee (GC) of any decisions to change the categorization of collected data. Updating the GC of such staff decisions provides an opportunity for oversight and review of the staff’s reclassification of information categorization determinations. This action by WECC staff and the GC will improve transparency when data categories are updated by ensuring that independent board members of the GC are fully aware that such changes have been made.

WECC has added to the ISP the identification of the Governance Committee as an entity to be notified of proposed data categorization changes.

WECC should work with stakeholders to develop specific criteria for categorizing data as Public Information, Market Sensitive Information, Confidential Information, and CEII. The Information Sharing and Reporting Policies provide an extensive list of data designated for inclusion under each data category. However, no explanation about why or what data should be included within each category is provided. WECC should work with stakeholders to develop criteria and a process for categorizing data, thereby improving transparency and providing substantial guidance to WECC staff in their efforts to review and change the categorization of collected data. This has been a longstanding WIRAB recommendation; one that WIRAB believes is an important aspect of a well-developed data sharing policy.

WECC is subject to and must follow Section 1500 of the NERC Rules of Procedure as the criteria for categorizing data as Confidential, CEII, and Market Sensitive. WECC does not believe an attempt to develop more specific criteria to implement the definitions in Section 1500 is appropriate or necessary, as such determinations come down to engineering judgment and discretion. The explanation as to why data is in each category is that WECC believes that data meets the corresponding definition in Section 1500. A transparent process for categorizing data, including opportunities to provide comments or guidance to WECC staff, is already provided for in the policy.