

October 31, 2014

**VIA ELECTRONIC FILING**

David Erickson  
President and Chief Executive Officer  
Alberta Electric System Operator  
2500, 330 - 5 Avenue SW  
Calgary, Alberta  
T2P 0L4

RE: *North American Electric Reliability Corporation*

Dear Mr. Erickson:

The North American Electric Reliability Corporation (“NERC”), in accordance with the *NERC Rules of Procedure* Section 1604.2,<sup>1</sup> respectfully submits the attached Western Electricity Coordinating Council (“WECC”) Data Request Process.

With respect to Regional Entity data requests, the *NERC Rules of Procedure* Section 1604 provides that a Regional Entity may develop its own procedures for requesting data or information, so long as any such procedures include at least the same procedural elements as are included in Section 1600. Such Regional Entity procedures must also be submitted to NERC for approval and, upon approval, NERC must file the proposed procedures for approval to FERC and other applicable governmental authorities.

On May 15, 2014, the WECC Board of Directors reviewed a proposed version of the WECC Data Request Process that was written to permit WECC staff to issue mandatory data requests for

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<sup>1</sup> The *NERC Rules of Procedure* Section 1604.2 states:

A Regional Entity may also develop its own procedures for requesting data or information, but any such procedures must include at least the same procedural elements as are included in this Section 1600. Any such Regional Entity procedures or changes to such procedures shall be submitted to NERC for approval. Upon approving such procedures or changes thereto, NERC shall file the proposed procedures or proposed changes for approval by the Commission and any other Applicable Governmental Authorities applicable to the Regional Entity. The Regional Entity procedures or changes to such procedures shall not be effective in a jurisdiction until approved by, and in accordance with any revisions directed by, the Commission or other Applicable Governmental Authority.

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reliability data to entities in the Western Interconnection. WECC's Board of Directors deferred a decision on approving the process in order to allow its Member Advisory Committee ("MAC") to review and provide input. On June 25, 2014, the WECC Board of Directors approved the attached WECC Data Request Process, including amendments made by MAC during the review period. The MAC amendments added a provision to clarify that the process is not binding on entities outside of the United States. However, WECC may request comparable data or information from those entities on a voluntary basis.

On June 30, 2014, WECC submitted the proposed process to the NERC Board of Trustees for approval. On August 14, 2014, the NERC Board of Trustees approved the attached WECC Data Request Process.

Following the Federal Energy Regulatory Commission's approval of WECC's Data Request Process, WECC anticipates it may seek approval by its Board of Directors of such a data request as early as March 2015.

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins

Associate General Counsel

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*Counsel for North American Electric Reliability  
Corporation*

# **ATTACHMENT**



# WECC Data Request Process

## INTRODUCTION

Pursuant to Section 215 of the Federal Power Act and Section 1600 of the North American Electric Reliability Corporation (“NERC”) Rules of Procedure, Western Electricity Coordinating Council (“WECC”) has the authority to request data or information that is necessary to meet its obligations as a Regional Entity from owners, operators, and users of the Bulk Power System in the United States. This process is not binding on entities outside of the United States. However, WECC may request comparable data or information from those entities on a voluntary basis.

## SCOPE

This WECC Data Request Process (“Process”) shall not apply to or interfere with Requirements contained in any Reliability Standard to provide data or information. This Process shall also not apply to data or information requested in connection with a compliance or enforcement action or any procedures adopted applicable to such compliance or enforcement actions.

## PROCESS

1. **Submission to NERC and FERC:** WECC shall provide a proposed request for data or information or a proposed modification to a previously-authorized request, including the information specified in Section 2 below as applicable, to NERC and the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Office of Electric Reliability (“Office of Electric Reliability”) at least twenty-one (21) days prior to initially posting the request or modification for public comment. Submission of the proposed request or modification to NERC and the FERC Office of Electric Reliability is for the information of NERC and the Commission. WECC is not required to receive any approval from NERC or the Commission prior to posting the proposed request or modification for public comment in accordance with Section 2 below or issuing the request or modification to Reporting Entities following approval by the WECC Board of Directors.
2. **Posting for Comment:** WECC shall post a proposed request for data or information or a proposed modification to a previously authorized request for data or information for a forty-five (45) day public comment period.
  - a. A proposed request for data or information shall contain, at a minimum, the following information:
    - i. a description of the data or information to be requested;
    - ii. how the data or information will be used;
    - iii. how the availability of the data or information is necessary for WECC to meet its obligations as a Regional Entity;
    - iv. a description of how the data or information will be collected and validated;
    - v. a description of the entities (by functional class and jurisdiction) that will be required to provide the data or information (“Reporting Entities”);
    - vi. the schedule or due date for the data or information;

- vii. a description of any restrictions on WECC's dissemination of the data or information; and
    - viii. an estimate of the relative burden imposed on the Reporting Entities to accommodate the data or information request.
  - b. A proposed modification to a previously authorized request for data or information shall explain:
    - i. the nature of the modifications;
    - ii. an estimate of the burden imposed on the Reporting Entities to accommodate the modified data or information request; and
    - iii. any other items from Section 2.a above that require updating as a result of the modifications.
- 3. **Submission to the WECC Board of Directors:** After the close of the comment period, WECC shall make any revisions it deems appropriate to the proposed request for data or information in light of the comments received. WECC shall submit the proposed request for data or information, as revised, along with the comments received, and an evaluation of the comments and revisions, to the WECC Board of Directors.
- 4. **WECC Board of Directors Determination:** In acting on the proposed request for data or information, the WECC Board of Directors may authorize WECC to issue it, modify it, or remand it for further consideration.
- 5. **Minor Revisions to Data Requests:** WECC may make minor changes to an authorized request for data or information without WECC Board of Director approval. However, if a Reporting Entity objects in writing to such changes to WECC within 21 days of issuance of the modified request, such changes shall require WECC Board of Director approval before they are implemented.
- 6. **Authorization and Appeals:** Authorization of a request for data or information shall be final unless, within thirty (30) days of the decision by the WECC Board of Directors, an affected party appeals the authorization to the NERC Board of Trustees. Determinations of the NERC Board of Trustees may be appealed to the Commission.
- 7. **Owners, Operators and Users to Comply:** Owners, operators, and users of the Bulk Power System registered on the NERC Compliance Registry shall comply with authorized requests for data and information. In the event a Reporting Entity within the United States fails to comply with an authorized request for data or information under this Process, WECC may request that NERC request the Commission to exercise its enforcement authority to require the Reporting Entity to comply with the request for data or information and for other appropriate enforcement action by the Commission. Such requests shall be made through non-public submissions to NERC and the Commission.
- 8. **Confidentiality:** If the approved data or information request includes a statement that the requested data or information will be treated as confidential, then the applicable

provisions of Section 1500 of the NERC Rules of Procedure will apply without further action by a Submitting Entity. A Submitting Entity may designate any other data or information in the request as Confidential Information pursuant to the provisions of Section 1500. WECC shall treat all such data or information in accordance with Section 1500.

## APPROVAL AND ADOPTION

WECC BOARD OF DIRECTORS EFFECTIVE \_\_\_\_\_

<b>Custodian</b>	<i>General Counsel</i>
<b>Review Cycle</b>	<i>2 years</i>
<b>Last Reviewed Date</b>	<i>[Date]</i>