

RECLAMATION

Managing Water in the West

2008 NORTHWEST HYDRO OPERATORS REGIONAL FORUM

WECC/NERC COMPLIANCE



U.S. Department of the Interior
Bureau of Reclamation

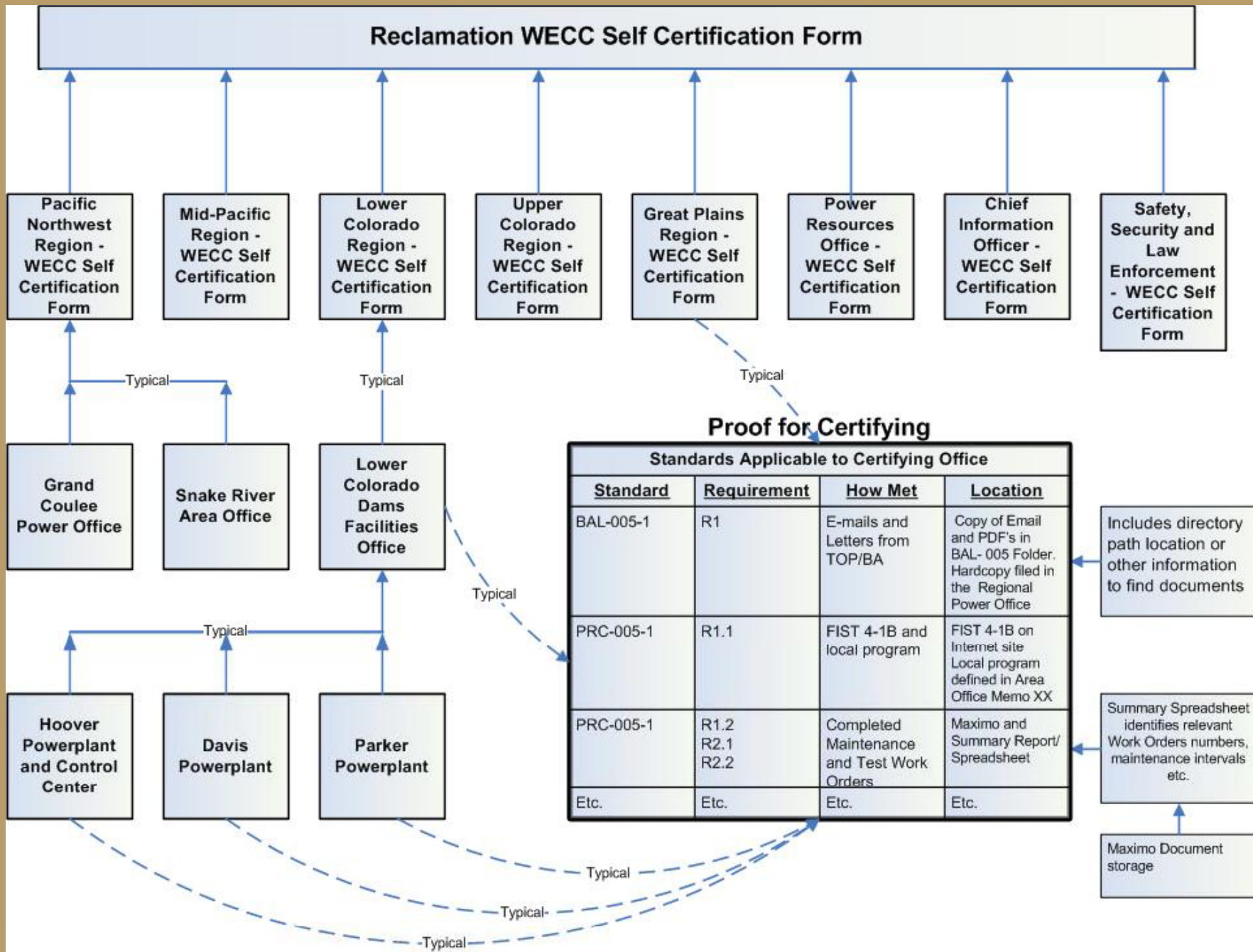
WECC/NERC COMPLIANCE

- **Topics**

- **Internal “certifications” preparing for Self Certification to the Western Electricity Coordinating Council (WECC) as GO/GOP**
- **Initial steps taken to establish internal auditing of the Reliability Standards**
- **Participation in the various teams involved with revision, review and new North American Electric Reliability Corporation (NERC) and WECC Standards**

Internal “Self Certification”

- **We self certified to WECC as a Transmission Owner in January 2008**
- **We will Self Certify to WECC as a Generator Operator and Generator Owner in July 2008**
- **12 Area Offices in 5 Regions have facilities that meet the NERC threshold for mandatory compliance**
- **27 power plants out of 58 operated by Reclamation**
- **128 generating units (including 7 house units used for Black start)**
- **Reliability Compliance Working Group**
 - **Identify available documentation to support requirement**
 - **Prepare self reporting and mitigation plans**



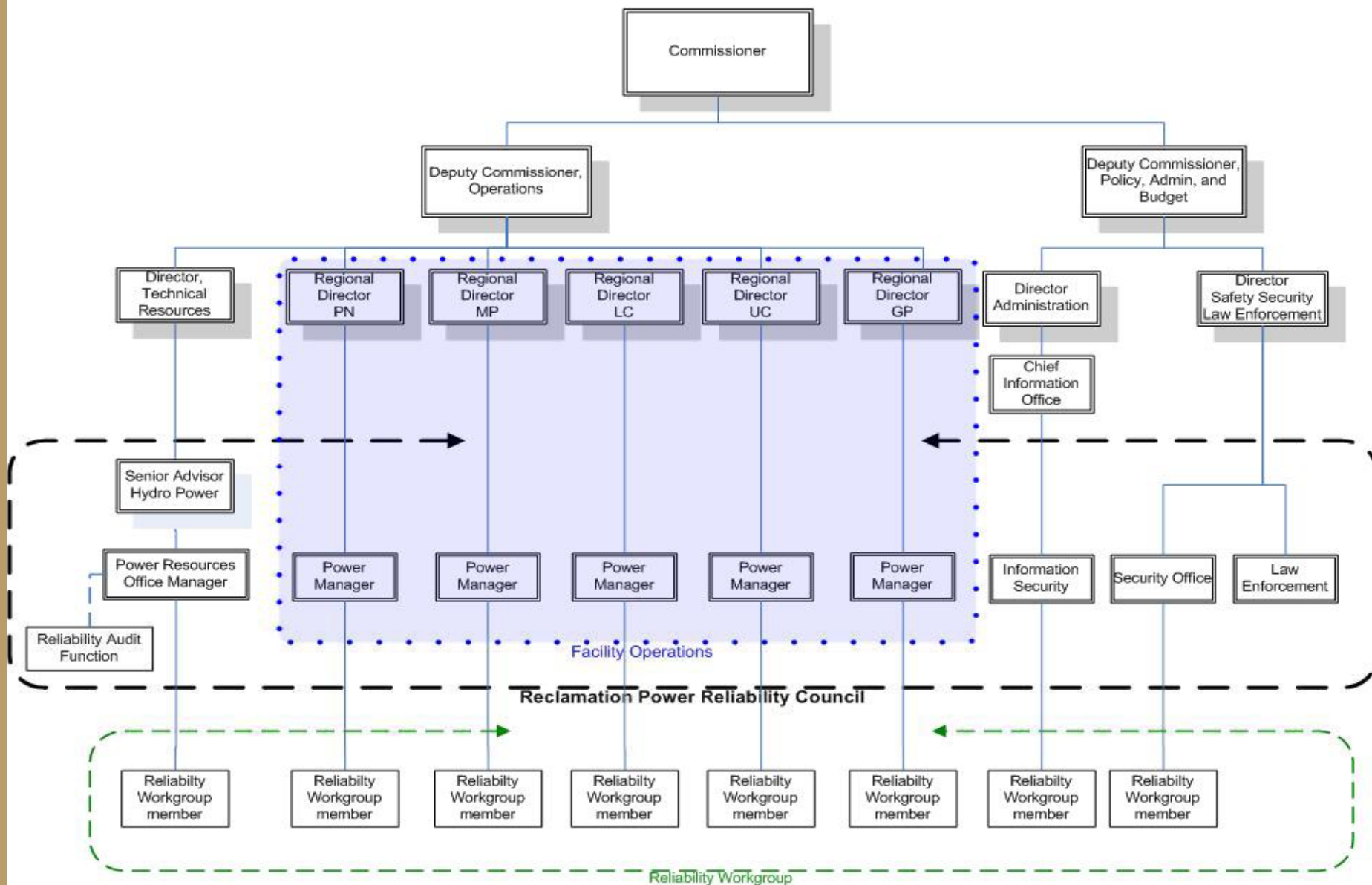
Internal “Self Certification”

- **Each office or facility (including generation control centers)**
 - **Certify that is compliant for those standards which are within its control; or**
 - **Establish a plan and schedule to become compliant with each requirement, so that an agency wide mitigation plan can be prepared.**
 - **Transmit their self certification to their supervising office.**
- **Certification to the Senior Advisor, Hydropower**
 - **Five Regional Directors and the Officials in the offices in Denver will provide certification regarding the standards which are within their control or responsibility.**
- **Senior Advisor, Hydropower will certify to WECC that Reclamation is in compliance or that self reporting and mitigation plans have been submitted.**

Reliability Standards Internal Audit

- Reclamation has started working to establish an internal audit program that covers the Reliability Standards
- Identified a Power Reliability Council that consists of
 - Regional Directors or their regional Power Managers
 - Chief Information Office
 - Director of Safety, Security and Law Enforcement
 - Power Resources Office
 - Senior Advisor, Hydropower
- Provide oversight and guidance

PROPOSED Reclamation Power Reliability Council Structure



April 9, 2008

Reliability Standards Internal Audit

- **Questions that have not been resolved**
 - How will the audit function be staffed (internally, contractor, combination)
 - How often will the audit be performed
 - How are the audits to be structured. Spot checks, detailed on predetermined standards, on site or off site, etc.
 - Can the audits be combined with our existing Power Reviews of Operations and Maintenance (PRO&M) which occur annually by the facility and every three years alternating between the Regional Office and the Power Resources Office.
 - Should the topics that are subject to the NERC/WECC reliability audits be removed from the PRO&M program

NERC and WECC Standards

- **NERC Standards and WECC Regional Standards**
 - Required to review each every three years
 - New Standards are being developed as a need is identified
 - Standards are being revised as a need is identified
- **Need to be a participant in the drafting teams for the Standards Action Requests and the Standards**
 - Represent the Federal interests from a public power perspective on the impacts of the proposed NERC or WECC standards language
 - Be aware of any Western Interconnection issues related to proposed NERC standards
 - Keep informed on the changes that are coming and to be able to advise managers on how to vote relative to approving a standard.

NERC and WECC Standards

- **Issues**
 - **Number of SAR and Standard drafting teams in progress and upcoming**
 - This will fluctuate over time, but will not go away
 - Identify those that have a major impact on operations
 - **Ability to participate on the drafting teams**
 - Staff available to participate
 - Impact on operations and maintenance accomplishment
 - Impact on ability to work on the compliance issues
 - **Costs of participation**
 - Fixed budget
 - Participation means a trade off on other operations and maintenance activities

NERC and WECC Standards

- **Solutions**

- **Work with other Federal and public power entities to participate as a group, to volunteer staff to be a part of these teams, so that each does not work in isolation**
- **Identify improved operations and maintenance practices to reduce or offset the costs of compliance and involvement in the development of the standards.**
- **Continue equipment efficiency improvements when the equipment is replaced to offset the costs of compliance and involvement in the standards development.**

Questions?

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