

- 1) Name: Raj Hundal on behalf of Powerex
- 2) Affiliation (please select all that apply):
 - Class 3
 - WECC OC
 - WECC MIC
- 3) How likely are you to support the straw proposal in its current form?

- I can support some of the changes outlined

- 4) With which of the five elements do you have concerns?
 - All of them
 - Working Committees Committee
 - Review Body Standing Committee
 - Project Management
 - Reliability and Security Risk Committee
 - Metrics

- 5) Please share your thoughts on Element 1: Working Committees. How can this element be improved?

Powerex is supportive of the value streams outlined in the proposal and the objective of creating more efficient working or standing committees to support WECC in achieving its strategic goals. Powerex also supports a full review of all committees to ensure that existing committees provide value and work products that benefit the WECC organization. Powerex also suggests that SETF take the appropriate time to review each committee and not rush the process in order to provide the WECC membership a paper that outlines the current deliverables and work being conducted. A thorough review, with stakeholder input, will ensure that certain committees are not prematurely retired and do not cause gaps in the value streams

Powerex understands from the proposal that the Working Committees (WC) would replace the current Standing Committees (and sub-committees) and would report to the Committee Review Body(CRB). The proposal also outlined various options where the WC could have the membership segregated into voting members and participating members. These options also describe how a limited voting structure could be implemented for the WC.

Powerex offers the following comments on the proposal that require further consideration and discussion:

- a) Governance – Currently the governance structure allows for sub-committee work to be vetted by broader membership through a reporting and approval process that occurs at the Standing Committee (SC) level. Members that cannot participate at the sub-committee level have the ability to provide input and vote on important work products at the Standing

Committee meetings. The proposal is moving to a different governance structure as depicted in Figure 1.

This is a fundamental change to the committee structures and may be the most impactful for WECC members. The accountability of the WC is not clear in the current proposal especially given that CRB and RSRC would not have direct oversight of the technical reviews or approvals of the work products. The removal of the voting rights from the RSRC could negatively impact WECC members that have limited resources or time to participate in several WC instead of a SC. The proposed structure, in our opinion, would not meet the objective to *“Encourage participation and maintain open meetings while ensuring work products are vetted and approved in a fair and appropriate manner.”*, because the governance structure would not have the appropriate vetting of the work products by the broader WECC membership.

- b) Limited membership – The proposal outlines different options on limiting voting rights and segregating members into either voting and participating classes. Of the three options proposed, Option 1 provides for the largest participation amongst the membership. Powerex is not supportive of segregation of members and restrictions of voting rights on any WC. Powerex believes that WECC benefits from an active and engaged membership, and limiting voting members on a committee would not increase stakeholder engagement.

Powerex also wishes to comment that it does not believe that last minute interjection or “late-comers” have derailed significant work at WECC in the past. There have been instances of important issues, such as changes to the Unscheduled Flow Mitigation Plan cost allocation, that have had significant impacts to smaller entities and required multiple iterations. Those instances also highlight the importance of the Standing Committees where smaller entities, who could not attend the sub-committee meetings due to lack of resources, were still able to raise their concerns and objections on issues prior to approval.

- c) Staffing and financial impacts – The proposal highlights additional requirements and workload for WECC staff to provide subject matter expertise as well as project management service. It would be important for membership to obtain the possible financial impacts of any SETF proposal before it is presented to the Board of Directors.

In sum, the retirement of Standing Committees in conjunction with the implementation of Working Committees, that has two different types of members (voting and participating) and limited voting, would not be conducive to meeting the goals set forth by the Board of Directors. Powerex suggests that SETF explore a phased approach where the Operating Committee and Market Interface Committee can be transitioned in to the RSRC, but also retain oversight and approval voting rights on work products from the WC. Powerex also suggests that it may be more beneficial to have the RAC remain as a sister committee to the RSRC instead of amalgamating all three committees into a singular body.

- 6) Please share your thoughts on Element 2: Committee Review Body. How can this element be improved?

Powerex is supportive of the CRB providing strategic oversight of working committees. Powerex suggests that the CRB should not be the only committee that can initiate a working committee.

It would be advantageous and more efficient if the RSRC, RAC or CRB could initiate the committees and work collectively to dissolve any committees that are no longer required. Most working committees should report to the RSRC or RAC, but those committees that require membership from both RSRC and RAC should be created under the CRB and report to the CRB. Any working committee created would provide the work products to the RSRC, CRB or RAC to ensure that the broader membership is able to review and approve the work products.

Powerex also appreciates the concerns raised by the WECC Board during the December Board Meeting and agrees with the directors who expressed reluctance for WECC Board members to serve on the CRB. The WECC Board has taken various steps over the last number of years to ensure that the Board provides the appropriate corporate governance to the WECC organization and the involvement of Board members at a committee level would be counter to previous Board decisions.

Powerex also suggests that the CRB should be broadened and the membership not be limited to only WECC management and stakeholder leadership. It would be beneficial for the CRB to include members from all membership classes and international jurisdictions. This may be achieved by having WECC MAC representatives nominate two members each for their respective classes. The nominated members for the CRB should not be WECC MAC members.

- 7) Please share your thoughts on Element 3: Standing Committee Project Management. How can this element be improved?

Powerex is not opposed to the inclusion of WECC team members that will provide subject matter expertise, administrative support, and project management services to the committees. It appears that this proposal could result in an increase in the scope of responsibilities for WECC staff. It is unclear in the proposal if the scope proposed would require additional staff or if there would be an optimized method in allocating staff which may minimize any financial impacts to WECC members. It would be useful for SETF to provide further information to stakeholders on the challenges and potential impacts regarding this element.

- 8) Please share your thoughts on Element 4: Reliability and Security Risk Committee. How can this element be improved?

Powerex is supportive of the proposed objectives and responsibilities for the RSRC. However, Powerex has suggested amendments to the proposal under element 1 and 2 that would increase the responsibilities of the RSRC. Powerex believes that there is value in having the RSRC approve work products and create working committees as needed. Powerex has also suggested that the MIC/OC be merged into the new RSRC, but the RAC remain as an independent sister committee.

- 9) Please share your thoughts on Element 5: Metrics. How can this element be improved?

Powerex is supportive of including metrics to measure the performance of committees for the purpose of measuring if WECC is performing the required work efficiently and in a timely manner. However, the measurement of time for a particular work product should not be the

primary measure and should not be given more importance than development of relevant and quality work products. It is also imperative that committees not be focussed on meeting deadlines set forth by CRB or WECC staff, and should not compromise quality work products for the sake of meeting those metrics. Any metrics should be more informative and not be used by WECC staff as part of any incentive or personnel performance plans.

Many WECC members provide subject matter experts for committee on a volunteer basis in addition to their role and responsibilities at their respective organizations, and it may be counter-productive to have those experts subject to strict deadlines given their other commitments.

Powerex suggests that SETF provide further details as to how this element will balance the concerns between meeting proposed deadlines and the development of quality work products.

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

In summary, Powerex has suggested the following enhancements to the proposal:

- Supports a full review of all committees to ensure that existing committees provide value and work products that benefit the WECC organization.
- Suggests that SETF take the appropriate time to review each current committee and not rush the process in order to provide the WECC membership a paper that outlines the current deliverables and work being conducted.
- Suggests that SETF explore a phased approach where the Operating Committee and Market Interface Committee can be transitioned in to the RSRC, but also retain oversight and approval voting rights on work products from the WC.
- Suggests that it may be more beneficial to have the RAC remain as a sister committee to the RSRC instead of amalgamating all three standing committees into a singular body.
- Suggests RSRC should approve work products and create working committees as needed
- Not supportive of segregation of members and restrictions of voting rights on any WC.
- Suggests that the CRB should not be the only committee that can initiate a working committee.
- Working committees should report to the RSRC or RAC, but those committees that require membership from both RSRC and RAC should be created under the CRB and report to the CRB.
- Any working committee created would provide the work products to the RSRC, CRB or RAC to ensure that the broader membership reviews and approves the work products.
- Suggests that the CRB should be broadened and the membership not be limited only to WECC management and stakeholder leadership. It would be beneficial for the CRB to include members from all membership classes and international jurisdictions.
- Suggests SETF provide further information to stakeholders on the challenges and potential impacts regarding the project management element.

- Suggests that SETF provide further details as to how this Metrics element will balance the concerns between meeting proposed deadlines and the development of quality work products.