

1 **Northwest Public Power Association**
2 **Resolution 2018-04**
3 **Reliability Standards and Defining Resilience**
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5 **Background**
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7 Providing safe, reliable electricity at a reasonable price while protecting the environment has
8 always been a fundamental responsibility of consumer-owned, not-for-profit electric utilities.
9 Customers of consumer-owned utilities experience equal and often greater electric system
10 reliability than other utility customers.
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12 In the years since Congress adopted mandatory and enforceable reliability standards in the
13 Energy Policy Act of 2005 [Federal Power Act (FPA) section 215], the state of reliability
14 standards has improved significantly by focusing on a risk-based prioritization approach to
15 standards development and auditing efforts. However, federal policymakers have become
16 increasingly concerned about the “resilience” of the grid – a term that is generally thought
17 of as the ability to maintain reliability during extreme weather events and to quickly
18 restore power in the wake of a widespread outage, and sometimes used to refer to the
19 ability to secure generation or facilities as assurance against grid failure. This subset of
20 reliability/resilience issues has been used to justify policy proposals unconnected to the
21 reliability standards-setting process and state and regional resource adequacy regimes.
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23 **NWPPA’s Position**
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- 25 • NWPPA supports efforts to maintain and improve the reliability of the nation’s BES.
- 26 • NWPPA supports risk-based reliability standards focusing only on facilities and entities
27 that are critical to reliability of the BES per Section 215 of the FPA.
- 28 • NWPPA urges policymakers to engage the industry to define “resilience” before adopting
29 any policy related to grid reliability outside the existing standards-setting process.
- 30 • NWPPA urges policymakers to ensure new policies do not adversely impact the ability of
31 local utilities to protect their respective distribution-level facilities in the most cost-
32 effective manner.
- 33 • NWPPA supports working relationships between the Federal Energy Regulatory
34 Commission, NERC, the regional reliability organizations and the electric utility industry
35 to identify and reduce unnecessary or duplicative standards and compliance
36 documentation.

- 37 • NWPPA supports the development of appropriate regional reliability standards
38 based upon the operating characteristics of regional power grids as defined by local
39 and regional experts.
- 40 • NWPPA supports the industry-led standard development process and advocates for
41 NERC's role as the lead to assure reliability of the BES.
- 42 • NWPPA urges consistent standard application and guidance from FERC, NERC, and
43 regional reliability organizations.

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45 Origination Date: 2011. Revised in 2012, 2014, 2016, 2017 and 2018.

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