

1 **Northwest Public Power Association**
2 **Resolution 2019-04**
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.
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10 In the years since Congress adopted mandatory and enforceable reliability standards in the
11 Energy Policy Act of 2005 [Federal Power Act (FPA) section 215], the state of reliability has
12 improved significantly by focusing on a risk-based prioritization approach to standards
13 development and auditing efforts. However, federal policymakers have become
14 increasingly concerned about the “resilience” of the grid – a term that is generally thought
15 of as the ability to maintain reliability during extreme weather or other catastrophic events
16 and to quickly restore power in the wake of a widespread outage, and is sometimes used
17 to refer to the ability to secure generation or facilities as assurance against grid failure.
18 This subset of reliability/resilience issues has been used to justify policy proposals
19 unconnected to the reliability standards-setting process and state and regional resource
20 adequacy regimes.
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22 **NWPPA’s Position**
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- 24 • NWPPA supports efforts to maintain and improve the reliability of the nation’s Bulk
25 Electric System (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 in defining “resilience” before
29 adopting any policy related to grid reliability outside the existing standards-setting
30 process.
- 31 • NWPPA urges policymakers to ensure that any new resilience policies do not adversely
32 impact the ability of local utilities to manage their respective distribution-level facilities in
33 a safe and cost-effective manner.
- 34 • NWPPA supports working relationships between the Federal Energy Regulatory
35 Commission, NERC, the regional reliability organizations and the electric utility industry
36 in defining resilience, and to identify and reduce unnecessary or duplicative standards
37 and compliance documentation that does not directly impact the reliability of the BES.

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

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46 Origination Date: 2011. Revised in 2012, 2014, 2016, 2017, 2018 and 2019.