

Comments of PacifiCorp
2004 WEQ Annual Work Plan Development Process

To The WEQ EC:

First of all, thanks to Steve Corneli for his very thoughtful memo regarding the Annual Plan process and for a very good first draft of the Plan. These comments are intended to support Steve's approach and to amplify on some of the issues and themes raised. A carefully considered and disciplined Annual Plan is essential to accomplish needed standards development and to build the credibility of the WEQ in the industry.

Comments

- **Highest Priorities.** As Steve's memo noted, the goal of the Plan should be to set work plans that are the industry's highest priorities. PacifiCorp proposes that, for each standard work item, the Plan format include a "Problem Statement" that would identify the reasons for the item and the expected benefits. This "why & benefits" test would help attract the needed expert volunteer resources and avoid a repetition of some of the less productive and frustrating efforts of this past year. It would also force a degree of specificity that would allow assigned subcommittees to "hit the ground running". If there is not consensus that a proposed item meets this simple test, it would not be included as a work item.
- **Exploratory Items.** Steve's straw Plan includes a category for "Provisional" items. We propose to modify this to be "Provisional and Exploratory". Exploratory items could give plan recognition to those items that fail the "why & benefits" test but nonetheless have advocates willing to undertake their exploration to determine need and benefits sufficient to move them, at a later date, into the standard work plan.
- **Achievable.** Without volunteers to work the plan, we will not succeed. Again, Steve got it right, the plan should avoid items without broad industry support and should not speculate on what the FERC or other agencies may or may not do.
- **Diversity.** It is unmitigated understatement to observe that the WEQ has a very diverse membership representing a wide range of visions for the industry and priorities. Further, compared to the gas industry's restructuring, the electric industry is characterized by greater vertical integration, includes significant non-FERC jurisdictional players and faces a patchwork of regional and state requirements and preferences. Consequently, WEQ standardization activities, including the Annual Plan, must continually consider the question of applicability across this diversity of industry participants.

With the simple addition of the “why and benefits” test, I believe we will introduce a discipline that is necessary for our success.

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