



October 31, 2023

Sarah Edmonds  
Western Power Pool  
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**Re: Concept Paper for a West-Wide Transmission Plan**

Dear Ms. Edmonds,

Thank you for the opportunity to provide feedback on the Western Transmission Expansion Coalition's (WTEC) Concept Paper for a West-Wide Transmission Plan. The Clean Energy Buyers Association (CEBA) is a trade association representing a diverse membership of over 430 members, including 89 Fortune 500 companies, representing \$7 trillion in revenue and 17 million employees and includes stakeholders from the commercial and industrial sectors, non-profit organizations, as well as energy providers and service providers. CEBA's membership includes some of the largest buyers of renewable energy that conduct business operations across the United States. Since 2014, commercial and industrial energy customers have voluntarily procured 71 gigawatts (GW) of clean energy, equivalent to 42% of all wind and solar capacity added to the U.S. grid during that time. CEBA's aspiration is to achieve a 90% carbon-free U.S. electric system by 2030 and to cultivate a global community of energy customers driving expanded demand for clean energy.

CEBA applauds Western Power Pool (WPP) and WTEC members for their efforts to prepare the Concept Paper and propose a new approach toward West-wide transmission planning. CEBA supports efforts to develop additional transmission solutions to support the needs of the future energy grid and agrees with WTEC that an inclusive and transparent regional transmission planning process has the potential to produce a transmission plan that meets a broad set of needs.

Customer demand is growing rapidly in the West, especially from large energy customers. Across the West, large energy customers are making firm commitments to decarbonize their energy supplies and electrify their operations. Many of these customers decide where to locate or expand their operations based on their ability to achieve these objectives. More transmission is needed to meet this increasing demand, ensure high levels of reliability, and ensure that the clean energy resources customers want can economically interconnect to the grid. To build the grid of the future, it is crucial that transmission planning processes account for both the increasing load of large energy customers and large energy customers' demand for clean energy. We emphasize the need for this planning process to ensure that large energy customers' demand is captured in the inputs and assumptions.

As the WTEC's Concept Paper notes, effective transmission planning in the West requires a holistic and coordinated process that includes a diverse set of stakeholders. CEBA appreciates that the Concept Paper proposes to include two representatives of industrial customers on the Regional Engagement Committee, which will report to the Steering Committee. While the sector definitions attached to the Concept Paper indicate that large commercial customers would be included in the definition of "Industrial Customer Advocate," to avoid any confusion, CEBA suggests that the Regional Engagement Committee roster include large clean energy customers within this definition.

CEBA and its members thank the WTEC for its work. We look forward to engaging with and supporting the development of a West-wide transmission plan.

Sincerely,

/s/ Heidi Ratz

Heidi Ratz

Deputy Director, Market and Policy Innovation

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