

**Comments of the Committee on Regional Electric Power Cooperation on Western Transmission  
Expansion Coalition’s Concept Paper dated October 2, 2023**

The Committee on Regional Electric Power Cooperation (“CREPC”) appreciates the opportunity to submit comments to the Western Power Pool (“WPP”) on a Concept Paper for a West-Wide Transmission Plan (“Concept Paper”) developed by the Western Transmission Expansion Coalition (“WTEC”). CREPC is a joint committee of the Western Interstate Energy Board and the Western Conference of Public Service Commissioners. CREPC has membership from each of 11 states and 2 Canadian provinces that form the Western Interconnection. In addition to these collective comments from CREPC, we encourage WPP and WTEC to accept feedback from individual states, as these collective comments on a short turnaround may not fully represent individual states’ reactions to the WTEC concept paper.

CREPC recognizes the need for a West-wide transmission plan and is encouraged at the broad stakeholder process outlined in the Concept Paper. The Concept Paper brings together state agencies, power marketing administrations, co-ops, investor-owned utilities, tribes, independent developers, customer advocates, environmental non-profits, and other interested stakeholders across the West to develop a transparent and robust Western Interconnection-wide transmission plan that can lead to actionable outcomes.

CREPC urges the WTEC to leverage its Concept Paper with other efforts currently evolving in the West, such as the ongoing CREPC transmission efforts, the “Connected West” study being conducted for GridLab and Gridworks in partnership with other NGOs, the California Independent System Operator’s 20-year Transmission Outlook, and WECC’s interconnection-wide Transmission Trends Assessment. WECC also has ongoing 10- and 20-year transmission analyses that can be coordinated with these efforts. Leveraging and aligning these various efforts will lead to broader support, avoid duplication of effort in conducting multiple studies, and promote complementary results. It is possible that WTEC may satisfy the needs and goals articulated in some of these other efforts, however, that will depend on the technical scope and development of the WTEC effort.

One of the primary transmission efforts that CREPC will be pursuing is a Cost Allocation study for inter-regional transmission. Part of this effort, including educational background and review of existing methodologies, may be conducted in parallel with the WTEC effort. CREPC believes that this cost allocation study will be complementary to the work undertaken by WTEC and together these initiatives will improve actionable outcomes for transmission planning and development in the Western Interconnection.

Another transmission study under consideration by CREPC is an investment-grade analysis of significant transmission needs in the Western Interconnection. The goals that motivate this study recommendation appear to be aligned closely with those of the WTEC—*i.e.*, promptly, objectively, and transparently identifying the highest value enhancements to the Western transmission grid. CREPC may use the results of such a study to work with DOE to designate identified lines as National Interest Electric Transmission Corridors, and/or to take other steps to facilitate action and investments in the transmission system.

CREPC is still considering this study concept and is prepared to engage with WTEC to align efforts, goals, and outcomes, and reduce redundancies.

In addition to general support and calls for coordination with other western transmission planning efforts, the following comments are provided to the specific questions posed by WPP in the October 2, 2023, press release accompanying the Concept Paper. We also encourage WPP and WTEC to continue to consider comments submitted past the deadline, as some states are still analyzing the proposal.

**1. The participation structure should be inclusive and ensure a broad set of perspectives is considered so that decision-makers, policymakers, and regulators have confidence in the results and recommendations.**

**Does the proposed participation structure properly balance the objectives of inclusivity and expediency? If not, how could it be improved?**

While we understand that the initial launch group was focused on the Pacific Northwest, if the intent is to conduct a truly West-wide study then CREPC recommends that the Steering Committee, and any other committees, sub-committees, or workgroups, be intentionally crafted to balance geographic participation across the entire Western Interconnection footprint. Balance of engagement – not simply representation – is key.

The structure of the Steering Committee as proposed in the Concept Paper attempts to broaden representation but is still weighted towards the Pacific Northwest region. Additionally, as WTEC begins its technical analysis, care should be taken to ensure policies from each state within the Western Interconnection are represented in the assumptions and modeling inputs such that the resulting transmission plan will be actionable across the interconnection. This may mean including and/or consulting with representatives of specific utilities, utility commissions, energy offices, Western transmission planning organizations, or state transmission authorities, as appropriate.

**2. The proposed participation structure outlines the organization of essential committees and engagement opportunities to support the effort.**

**What suggestions do you have about the composition of the committees and task force, and engagement with States and Tribes?**

CREPC appreciates the inclusion of state representation on the planning committees described in the Concept Paper. States in the West have limited resources and diverse policies and interests for transmission planning and will thus require flexibility as they work out how best to be represented as WTEC develops. Initially, CREPC asks that it be permitted to appoint a representative of its choosing to both the Steering Committee and to the Technical Committee, reflecting the characteristics outlined by WTEC for each of these roles. Further discussion is

needed to determine how to fill the seats on the Regional Engagement Committee. As the proposal develops, states may have more clarity on how they need to be represented in this effort; to this end CREPC recommends that WTEC maintain an open and regular line of communication with the CREPC Co-Chairs and staff to evaluate and adjust state representation as WTEC evolves.

Additionally, CREPC recommends that as the funding mechanism is developed, consideration should be given to providing technical expertise and support to the states if needed. If a process like this is to be successful, it will need robust participation and cooperation from all the state and provincial agencies in the Western Interconnection, many of whom are already under-resourced and spread thin from the plethora of regional market and transmission efforts occurring in the West.

### **3. We anticipate working closely with neighboring regions to achieve a broad viewpoint.**

**Is that intention clearly articulated in the concept paper and understood through the proposed participation structure? If not, what changes could be made?**

The Concept Paper identifies terminology for “regional” as being NorthernGrid and “inter-regional” as the collective footprint of the three regional planning organizations, however, it contemplates a joint planning effort with a West-wide (i.e., Western Interconnection-wide) footprint that moves beyond traditional Order 1000 regional and inter-regional planning. Use of Order 1000 terminology in the Concept Paper makes the meaning of “neighboring regions” unclear. Including the DC-interties would be a large lift, as is evidenced by the ongoing joint discussions in MISO and SPP and may be too ambitious to include in this initial study. If the intent is to include the Eastern Interconnection and ERCOT as “neighboring regions,” then this level of effort may be better informed once the NERC Inter-regional Transfer Capability Study is completed in December 2024, and pursued in later iterations of a western transmission planning effort.

While this may merely be a result of the initial planning discussions before the Concept Paper was broadened, if the main intent is to conduct the study with a NorthernGrid focused regional footprint and the “neighboring regions” are defined as CAISO and WestConnect, that should be clarified in the Concept Paper and following materials.

CREPC represents the states and provinces in the Western Interconnection, many of whom are interested in a joint West-wide transmission plan. If WTEC can garner enough support and participation from entities in a wide diversity of these Western states and provinces, it should consider the entire Western Interconnection as the main “region” of the study. Alternatively, if Order 1000 terminology is needed to match with potential funding requests, the definition of “regional” should be broadened to include each of the three Western transmission planning organization’s footprints instead of focusing solely on NorthernGrid.

**4. We anticipate that the coalition would work with an independent party to coordinate and review data, develop planning scenarios and analyze results of the studies.**

**What changes to the concept paper or proposed participation structure would give you greater confidence that a third party could provide independent analysis and recommendations?**

CREPC applauds WTEC for using an independent party to conduct the analysis and provide recommendations. As CREPC moves forward with independent consultants for CREPC's transmission efforts on cost allocation or investment-grade transmission planning, CREPC would encourage WTEC to align or coordinate the independent analysis being done to avoid conflicting assumptions and promote transparency and stakeholder buy-in.

CREPC is supportive of efforts to conduct a West-wide transmission plan and would like to be involved in the discussions as the design for the study contemplated in the Concept Paper develops. CREPC's member states are open to further discussions to see how they might contribute and partner with WPP and WTEC on this West-wide transmission plan.

Respectfully submitted on the 31<sup>st</sup> day of October 2023,

Sarah Cottrell Propst  
CREPC Co-Chair  
Cabinet Secretary, New Mexico Energy, Minerals  
and Natural Resources Department

Megan Decker  
CREPC Co-Chair  
Chair, Oregon Public Utility Commission