



The Public
ADVOCATES
OFFICE

Comments on the Western Transmission Expansion Coalition (WTEC) Concept Paper for a West-Wide Transmission Plan

October 31, 2023

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides responses to the feedback questions on the Western Transmission Expansion Coalition (WTEC) Concept Paper for a West-Wide Transmission Plan (Concept Paper).¹ Colorado Office of the Utility Consumer Advocate, Montana Office of Consumer Counsel, Nevada Attorney General Bureau of Consumer Protection, Oregon Citizens' Utility Board, and the Utah Office of Consumer Services support these comments. Cal Advocates is an independent ratepayer advocate with a mandate to obtain the lowest possible rates for utility services, consistent with reliable and safe service levels, and the state's environmental goals.² The following are responses to the feedback questions:

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?

Cal Advocates supports the proposed inclusion of representatives of two ratepayer advocacy organizations in the proposed Regional Engagement Committee for the west-wide transmission planning effort. Cal Advocates recommends that Section 2.2 of the proposal clarifies that the ratepayer advocacy organizations represent residential and small commercial ratepayers. Also, in Section 2.2 of the proposal, the proposal should clarify that the two representatives for industrial customers should include large commercial customer representatives. These two definitions would be consistent with Attachment 1: SEC Sector Definitions.³ With the clarification that the two advocates representing residential and small commercial ratepayers, the Regional Engagement Committee would reflect the perspectives of the western region's ratepayers and would also ensure consistent residential and small commercial ratepayer advocate participation.

Also, the proposed Steering Committee does not include any representative of a ratepayer advocacy organization. Cal Advocates recommends the inclusion of a ratepayer advocate on the Steering Committee. A ratepayer advocate on the Steering Committee would ensure the continuous and consistent representation of ratepayer interests throughout the decision-making process on the transmission infrastructure that ratepayers will ultimately fund.

Does the proposed participation structure provide appropriate transparency, including how the inputs and assumptions are determined? In not, how could it be improved?

Cal Advocates recommends that the 20-year west-wide transmission planning effort include a public review process that includes workshops on inputs and assumptions, study scenarios and analysis, major findings, and recommendations. This public review process should provide the opportunity for stakeholders to comment on the plan and material presented in the workshops. Stakeholders should have the opportunity to submit

¹ WPP (westernpowerpool.org)

² Cal. Public Util. Code, § 309.5.

³ Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan, Attachment 1: SEC Sector Definitions at p. 10.

comments either separately or through their sector liaison. Public workshops and the opportunity to submit written comments promote transparency, which can be harmonized with expediency by establishing a reasonable schedule for workshops and comments. This comment process could be similar to the California Independent System Operator's Transmission Planning stakeholder process or the Western Resource Adequacy Program's (WRAP) stakeholder engagement process. Additionally, Cal Advocates requests that the proposed independent party that conducts the 20-year planning study provide written responses to submitted comments that discuss how the comments were considered in the study.

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?

Please refer to our response to question 1. Cal Advocates also recommends that the Technical Task Force include the Western Electricity Coordinating Council (WECC). WECC's knowledge and expertise as well as its studies can provide important information on the current performance of the western interconnection and major issues and problem areas.

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?

Cal Advocates has no comment on this proposal at this time.

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?

To promote greater confidence in the plan and plan development, Cal Advocates recommends inclusion of a public review process as described in response to question #1. To help ensure confidence in the independent analysis for the plan, Cal Advocates recommends that the proposal identify the entity that would manage, select, and fund the proposed independent consulting firm. Cal Advocates recommends that the entire western region fund the proposed independent consultant. Cal Advocates also recommends that a committee, representing a broad spectrum of the western region's stakeholders, select the proposed independent consulting firm. Cal Advocates also recommends that the management of the consultant supports the independent nature of its contribution to the planning process.