



WARM SPRINGS POWER & WATER ENTERPRISES
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VIA EMAIL: sarah.edmonds@westernpowerpool.org

Sarah Edmonds
President, Western Power Pool
725 NE Ambassador Place, Suite M
Portland, OR 97220

Re: Comments to Concept Paper for a West-Wide Transmission Planning Process

Dear Sarah:

The Confederated Tribes of the Warm Springs Reservation of Oregon (CTWS) appreciates the opportunity to comment on the Concept Paper for a West-Wide Transmission Planning Process. Warm Springs Power and Water Enterprises (WSPWE) is a wholly owned tribal enterprise whose purpose and object is, among others, to advance CTWS interests in the development and utilization of power resources for the benefit of tribal members, the state of Oregon and the Pacific Northwest. WSPWE supports the planning effort to address needed transmission to serve the region's needs. WSPWE anticipates being deeply engaged to share CTWS tribal perspectives and needs as the Warm Springs reservation hosts significant transmission resources and holds significant renewable energy potential. CTWS is not alone. Tribes are paying attention to this revolution and with their collective vast land base, will be instrumental in enabling transmission expansion across the west. This is an opportunity to expand the regional electric grid to be inclusive of Tribes — but for this to be a just transition, it is essential that Tribes are part of the discussion.

The Inflation Reduction Act of 2022 contained some of the most aggressive moves supporting climate change ever made by the United States government, including billions aimed at supporting clean energy, such as wind and solar, as the technology propagates across the United States. Some of those billions will help Tribes get similar efforts off the ground, but translating that new surge of funding into completed, interconnected projects is going to require both holistic transmission planning as well as policy shifts. Holistic transmission planning is not new to our region—it wasn't that long ago a "One Utility Planning" concept drove decisions on new transmission infrastructure!

A report by the Lawrence Berkeley National Laboratory¹ notes that the total capacity in US interconnection queues grew 40 percent year-over-year in 2022, with more than 1,350

¹ [Grid connection requests grow by 40% in 2022 as clean energy surges, despite backlogs and uncertainty | Electricity Markets and Policy Group \(lbl.gov\)](#)

gigawatts of generation and 680 gigawatts of storage waiting to connect. As a result, queue times are increasing — the typical project in queue spent five years waiting for connectivity approval compared to three years in 2015 and fewer than two years in 2008. Without some kind of change, Tribes will be left with renewable projects that can't go anywhere or function within the larger grid.

CTWS is actively pursuing opportunities to unlock the renewable development potential on its reservation, and recently was awarded a significant grant from DOE to facilitate east-to-west transmission expansion, in partnership with Portland General Electric, of the Bethel-Round Butte 230 kV transmission line². This demonstrates that engagement with Tribes can facilitate their key role as part of the regional transmission expansion solution.

Specifically related to the Concept Paper, CTWS offers the following:

1. Tribes need to be engaged on par with the States and not just as a stakeholder. Where Tribes have energy goals, they also need to be met in this process. It is important to understand that Tribal input is likely to be varied, so broader stakeholder processes are important. Tribes have limited capacity--support for them to participate in robust committee engagement is needed.
2. In footnote 3 of the Concept Paper, "actionable" transmission plan is defined as "development of a transmission plan that can enhance regional and inter-regional reliability needs, address economic efficiency, and help states achieve their respective goals." This needs to include Tribes—*viz.*, "help states and tribes achieve their respective goals."
3. Page 4-5 definition of "Fair and Unbiased" is defined as "A plan that is fair and unbiased across resource types, business models, and to all participants and stakeholders, and which includes recommendations that are acceptable within current and evolving regulations and requirements of each applicable federal, state, and local jurisdiction." This needs to include Tribes—*viz.*, "and which includes recommendations that are acceptable within current and evolving regulations and requirements of each applicable federal, state, tribal and local jurisdiction."
4. Steering Committee Members are proposed to include "Senior and executive level leaders from utilities and energy industry stakeholders." The proposed members include a State representative within this category yet omit Tribes. There are Tribes with the requisite qualifications to participate on the Steering Committee and the Steering Committee should add "Tribe Representative (to be determined through consultation with tribes)"
5. It is noted that the scope excludes, intentionally, "outputs relating to transmission construction, siting, and permitting." This misses an interrelated concept that could affect some minimum level of siting feasibility. Tribal goals could exclude use of traditional cultural sites and/or tribal lands (which require tribal consent), so these

² [DOE-GRIP-Confederated-Tribes-of-Warm-Springs-Oregon.pdf \(energy.gov\)](#)

factors are relevant to the stated goals of developing a plan focused on reliability and economic efficiency. In other words, the outputs need to be informed by Indigenous Knowledge and this concept should be expressly included—perhaps in the Engagement with Tribes section.

6. It would be helpful to understand the timeframe for this effort—even if it is preliminary at this point.

Thank you again. WSPWE looks forward to this continuing dialogue.

Sincerely,



Cathy Ehli
General Manager
Warm Springs Power & Water Enterprises

c via email: CTWS Tribal Council
Robert Brunoe, CTWS Secretary-Treasurer
Ellen Grover, BBK LLC
Austin Smtih, Jr., CTWS BNR Manager