

October 31, 2023

Western Power Pool
Attention: Sarah Edmonds, President
Sarah.edmonds@westernpowerpool.org
7525 NE Ambassador Place, Suite M
Portland, OR 97220

Re: Western Transmission Expansion Coalition

Dear President Edmonds,

Grid United LLC (“Grid United”) is very pleased to see the Western Power Pool facilitating an effort to rationalize transmission planning in the WECC. Such initiatives are critical to ensuring the continued delivery of reliable electric power as our continent’s electricity system rapidly changes. We hope this effort will also allow the system to be expanded more economically than it would be under the current planning paradigms in the West. Grid United appreciates the opportunity to provide input on the Western Transmission Expansion Coalition (“WTEC”) Concept Paper to the Western Power Pool and Steering Committee and respectfully submits the following comments.

Grid United is a transmission development company focusing on building infrastructure projects that will help modernize the U.S. electric grid. Grid United is developing a series of utility-scale, interregional transmission line projects to increase reliability and help deliver low-cost electricity to consumers. Grid United is backed by Centaurus Capital, LP, which has an established track record of developing major energy infrastructure projects.

Responses to selected questions the WPP solicited feedback on are below:

1. 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?

Grid United fully agrees that creating an actionable transmission plan should be the first goal of the WTEC and does not discount the challenge of that undertaking. However, while Grid United believes the WTEC structure as written provides a good balance between inclusivity and efficiency, there is a risk that an effort of this scale becomes unwieldy and loses its effectiveness. To help maintain focus, we encourage the WTEC to carefully define what it means for a transmission plan to be actionable based on feedback from the utilities and developers who may choose develop projects based on this plan.

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

The proposed multi-layered participation structure captures a broad cross section of power industry stakeholders which will bring a robust set of ideas and viewpoints to the WTEC. That said, by

omitting independent transmission developers from the Steering Committee, the WTEC is missing out on valuable experience from parties actively involved in transmission development in WECC and beyond. Grid United requests that it be considered for the Steering Committee and, barring that, for one of the Independent Transmission Company seats on the Regional Engagement Committee.

As an active transmission-only developer in the West, Grid United can bring real-world experience to the WTEC regarding the feasibility and value of different transmission options and study methodologies. Our development philosophy is closely aligned with the WTEC's themes of creating a different, inclusive, and expedient approach to transmission planning. Additionally, our team brings many decades of transmission planning experience spanning the formation and evolution of the PJM, MISO, SPP, and ERCOT RTOs. The WTEC is likely to face similar challenges as the Eastern RTOs and would benefit from additional leadership with experience navigating similar organizations in other regions.

Among the transmission projects Grid United is actively developing, three cross the Western and Eastern interconnection seam. These three projects use high-voltage direct current ("HVDC") technology and are designed to carry up to 3,000 MW bi-directionally either in their initial configurations or through subsequent phases.

- The North Plains Connector ("NPC") project connects the Western Electricity Coordinating Council ("WECC") at Colstrip, Montana to both the Southwest Power Pool ("SPP") and Midcontinent Independent System Operator ("MISO") in central North Dakota.
- The Wyoming Intertie ("WyTie") project connects WECC and SPP at the Laramie River Station near Wheatland, Wyoming.
- The Three Corners Connector ("3CC") project connects WECC at the Comanche Power Station in Pueblo, Colorado and SPP at the Optima substation in Guymon, Oklahoma.

Grid United focuses on the development of large-scale transmission projects with strong fundamentals that would not otherwise be developed through traditional planning processes. Our stakeholder-first strategy is meant to avoid the stumbling blocks that have historically hindered both utility and independent transmission development. As an independent transmission company, the success of Grid United's projects is tightly tied to our relationships with landowners, Tribes, government agencies, and potential utility customers. Our strategy acknowledges the importance of these relationships by prioritizing early and continuous contact with all stakeholders as we de-risk our projects.

The benefits of this strategy can be seen by our success in the field. To date, Grid United has acquired 100% survey permission from landowners along the route of the WyTie project and has executed options for easements with private landowners representing over 60% of the route for NPC. We are in discussions with multiple utilities regarding their potential ownership of our projects and in January 2023 ALLETE announced its intention to jointly develop the NPC project with Grid United. We recognize that large transmission projects have many beneficiaries and will likely require multiple utility owners. We believe acting as a partner to these utilities and navigating multiple regulatory, planning, and cost allocation frameworks simultaneously will constitute a key factor in our projects' success.

For these reasons, Grid United believes we have much to offer to the WTEC and would be eager to apply our knowledge and experience to support the development of this much needed transmission initiative. While Grid United has its own projects actively under development in the Pacific Northwest and elsewhere in WECC, we subscribe to the mantra that a rising tide lifts all boats and seek to do all that we can to address the need for more robust transmission planning.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Skelly', with a stylized flourish at the end.

Michael Skelly
CEO
Grid United LLC