

**Subject:** Comments on Western Tx Expansion Coalition (WTEC) Concept Paper

Sarah,

Thank you for sending me a copy of the WTEC Concept Paper. This email constitutes my formal comments on the Paper.

1. On a general level, I strongly agree with the Paper's observation (in its Introduction) that "current transmission planning frameworks in the West do not result in sufficient transmission solutions to support the needs of the future energy grid." Hence the desirability of initiating WTEC. Western transmission entities must develop policy driven, strategic projects to supplement those identified and driven by generator transmission service requests (TSRs) as in BPA's TSEP process. These strategic lines will presumably enable PNW/WECC utilities, and other transmission developers, to proceed with projects which will meet State mandated energy policy goals and access the load and generation diversity throughout WECC to both ensure robust resource adequacy programs (e.g. WRAP) and enable contemplated day ahead market(s), (and ultimately WECC RTOs) to maximize their economic benefits. To achieve such alignment, WPP/CREPC/BPA should hire a single tx consulting firm to produce a single study identifying needed tx developments/projects in the PNW/WECC region (presumably from 2024-2040).
2. Both Wester Power Pool (WPP) and the Committee on Regional Electric Power Cooperation (CREPC) are pursuing similar approaches to identify/develop needed strategic transmission additions in WECC. Given this circumstance, both organizations should seek maximum alignment as they move forward.
3. To achieve such alignment, WPP/CREPC/BPA should seek to have a single tx consulting firm to produce a single study identifying needed tx developments/projects in the PNW/WECC region (presumably from 2024-2040).
4. A single consultant/study assumes that WPP/CREPC/BPA, and other members of the current WTEC Steering Committee, can agree on a scope of work and the preferable consultant (after an RFP) to perform that work. This is a significant challenge, but at least possible given seeming alignment of the parties most directly involved with, and affected by, this effort.
5. For this joint approach to succeed, State PUCs selected CREPC members need to be more directly involved in the WTEC effort. WTEC should consider having two CREPC members on its current Steering Committee. One would be Megan Decker (as Chair of CREPC) or her designee. The other could be Ann Rendahl or another PUC rep designated by CREPC. In addition to these two regulators on the Steering Committee, WTEC would also have two State Agency reps (presumably PUC or State energy office personnel) on the Regional Engagement Committee (REC) as specified on page 6 of the WTEC Concept Paper.

This increased PUC involvement in WTEC is especially important given the critical role State regulators will play in evaluating their IOU financial participation in any of the yet to be identified regional tx upgrades. While regulators cannot preapprove such participation, their knowledge of how and why such tx projects were selected will hopefully enable some

flexibility when evaluating IOU participation in individual tx projects. Such IOU participation, in turn, will effectively backstop BPA participation thus enabling BPA to take more risk in financing needed tx projects if third party subscription to such projects (through TSEP or other means) is uncertain.

6. In addition to proceeding to a single consultant/study, WPP/CREPC/BPA should hire Rich Glick to provide general policy advice on this joint project. Rich's involvement (as a former FERC Chair) would put him in a position to help all participating parties, especially Steering Committee members, reach consensus on key issues.

Best of luck, Sarah, in moving forward with this effort. While challenging, it could produce enormous reliability and economic benefits for the PNW/WECC.

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