



October 31, 2023

Western Power Pool
Sarah Edmonds, President
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7525 NE Ambassador Place, Ste M
Portland OR, 97220

Re: Western Transmission Expansion Coalition

Dear President Edmonds:

The Interwest Energy Alliance¹ (“Interwest”) applauds the Western Power Pool (WPP), the Bonneville Power Administration and the other transmission owners who participated in the informal discussions that have given rise to the Western Transmission Expansion Coalition (WTEC). We appreciate the invitation to provide input on WTEC’s Concept Paper for developing an actionable West-wide transmission plan and the opportunity to serve on the Steering Committee. As a Steering Committee member, we have limited our initial comments to a high level knowing that there will be future opportunities to engage in greater detail. We look forward to supporting this effort.

Interwest strongly supports the major elements of the Concept Paper’s proposal. Specifically, the proposals to (1) engage a larger set of transmission owners, the California ISO and WestConnect members, (2) consider a range of load and generation resource projections that reflect climate change, extreme events, and accelerating electrification, and (3) secure support from an independent consulting firm, all represent significant improvements over current planning efforts. In addition to these key elements, we recommend that the study work focus on the net benefits of transmission investments to ratepayers and assess a wider range of benefits than is typically considered in FERC Order 1000 planning efforts. Much attention has recently been given to the wider range of benefits provided by new transmission and several recent reports and examples are readily available.²

Our responses to the WPP’s specific questions on the Concept Paper are as follows:

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

¹ Interwest is a 501(c)(6) nonprofit trade association of wind, solar, geothermal, energy storage and transmission developers and manufacturers working with the leading non-governmental advocacy organizations to expand renewable energy markets throughout New Mexico, Colorado, Wyoming, Utah, Nevada and Arizona.

² Two examples are “[Transmission Planning for the 21st Century: Proven Practices that Increase Value and Reduce Costs](#)” (Pfeifenberger et al., 2021) and “[Enabling low-cost Clean Energy and Reliable Service Through Better Transmission Benefits Analysis](#)” (Gramlich, 2022).”

Interwest appreciates the WTEC's acknowledgement of the tradeoff between expediency and participation. Interwest especially supports the WTEC's identification of expediency as a priority and believes the proposed participation roster appropriately balances the inclusion of perspectives that are often not part of the FERC Order 1000 Regional Planning Groups, while not being so expansive as to threaten the expediency of the work. The proposed representation is slightly heavy on organizations in the Pacific Northwest in the IPP and public power sectors (as makes sense given the origins of this effort with Northern Grid members), and Interwest would welcome representation from these sectors from outside the Pacific Northwest should there be interested and willing representatives.

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

The proposed inclusion on the Technical Task Force of representatives from the independent consultant, PNNL, and NWPCC is excellent and provides confidence that the choice of inputs will reflect a wider range of stakeholders than is typically included in FERC Order 1000 planning efforts. Furthermore, Interwest believes transparency need not be addressed exclusively through participation because it can be also addressed by taking care in how the work products are presented and by making input and output data available at a reasonable level of detail. Interwest believes the representation on the Regional Engagement Committee proposed in the Concept Paper for consumer advocates, state commissions, and state agencies is adequate, and would welcome additional participation from these sectors on this committee to the extent there is interest, but we also recognize that some stakeholders may experience time or resource constraints that may limit participation and believe that the proposed representation for these sectors should be considered an option to the extent there are interested representatives, but not a requirement.

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?

Interwest supports the composition of the committees and task forces as proposed, especially the inclusion of merchant and independent transmission developers. Interwest is available to support and encourage engagement with States and stakeholders in the geography of our membership (AZ, CO, NM, NV, UT, WY). Interwest does question the reasoning behind the higher proposed representation of COUs on the Regional Engagement Committee, which is double that of any other sector, though Interwest is not inherently opposed to high COU representation.

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?

Yes, the intent is clear, though it is not clear whether the neighboring regions have expressed a similar willingness to engage. As noted above, Interwest works primarily in

one of these neighboring areas—which has large overlap with the WestConnect planning region—and we are available to assist with outreach and to encourage engagement from transmission owners and stakeholders in the region we cover.

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?

Interwest is confident that the structure as proposed will allow a third party to provide compelling analysis and recommendations.

Interwest greatly appreciates the WPP’s leadership in this effort, along with the initiative provided by BPA and other Northern Grid members, and we look forward to supporting the WTEC’s efforts to produce an actionable West-wide transmission expansion plan.

Sincerely,



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