

Submittal Comments to Western Power Pool
Western Transmission Expansion Coalition
Development of a West-Wide Transmission Plan
Concept Paper

The following comments are submitted by Rob Kondziolka and Ron Belval. We do not represent any organization, nor have we received funding for our work efforts. The comments reflect our interest in seeing the west achieve durable, transparent, regionally balanced, and economical interconnection-wide transmission planning outcomes to meet the significant challenges of a dramatic change in resource mix while meeting projected load growth. This must be done in the context of maintaining reliability and increased resiliency as expanding electrification occurs across multiple sectors.

We support and applaud the proposed objectives outlined in the Concept Paper. Specifically, we support:

1. An interconnection-wide long-term top-down approach, for 20-year horizon scenario planning, to supplement and help guide the development of the formal ten-year transmission plans.
2. The proposed structure to develop, manage, and implement a long-range interconnection-wide transmission planning process as outlined in the Concept Paper. It appears reasonable and doable. We emphasize that the structure and processes need to be transparent and provide opportunities for adequate review, input, and acceptance of outside viewpoints in all steps of the process.
3. The approach using scenario plans to evaluate a wide range of future resources.

Attached is a draft white paper that we have developed that proposes how a coordinated and synchronized process with the three Western Planning Regions and WECC can be developed and implemented. The white paper identifies recommended changes to make this work. The changes identify how coordination, synchronization, and scenario planning can be implemented to achieve the Concept Paper objectives. We believe the Western Transmission Expansion Coalition will find value by incorporating these recommendations into the final process.

We strongly recommend an on-going biennial process for the longer range (20 years and beyond) transmission planning horizon while continuing to coordinate with annual ten-year transmission planning. We recommend the proposed work be a continual process to incorporate the evolving topology, technology, forecasts, policies, regulations, and information. The Concept Paper effort should not focus on a one-time effort.

In our white paper recommendations, we wanted to minimize impacts to existing FERC Order 1000 compliant Western Planning Regions regional transmission planning processes. More specifically, we believe it is important to support Transmission Owners' local transmission planning efforts and to continue integration of those plans into 10-year horizon regional transmission plans. We propose the addition of 20-year horizon scenario planning, as a separate module. Such changes, based on the NOPR (RN21-17-000 FERC NOPR 042122) proceedings, are likely to be consistent with an anticipated FERC order on the NOPR that will be issued in the foreseeable future. FERC jurisdictional TOLSOs may

document these changes to their planning processes and incorporate them into future compliance filings in response to the expected FERC order.

As noted in the white paper, with the dramatic transition in the resource mix, consideration should be given to the impacts to current Path Ratings and System Impact Studies as the resource mix changes. This is an item that is not receiving adequate attention but is critical when modeling the future transfer capabilities.

As background, we initiated an effort this past summer without knowledge of the work or perspectives of the Western Transmission Expansion Coalition. We developed the draft white paper to address many of the issues the Concept Paper proposes to address. The genesis of the white paper originated through stakeholder comments and presentations given to WestConnect in early 2021. Our primary communication was with WestConnect and we requested their review and comments. We subsequently reached out for comments from CAISO and NorthernGrid. The Concept Paper was issued during our review and comment phase of white paper development. After reviewing the Concept Paper we believed it made sense to seek incorporation of our work and recommendations into the Western Transmission Expansion Coalition efforts.

We stand ready to support the Western Transmission Expansion Coalition effort.

Respectfully,

Ronald Belval and Robert Kondziolka