

MONTANA GENERATION COMPANY, LLC

October 31, 2023

Ms. Sarah Edmonds
President and CEO
Western Power Pool
7525 NE Ambassador Place, Suite M
Portland, Oregon 97220

Re: Western Transmission Expansion Coalition Proposed Concept Paper

Dear Ms. Edmonds:

The Montana Generation Company, LLC (“Montana Generation”) submits these comments in response to the Western Power Pool’s (“WPP”) recently released paper outlining the Western Transmission Expansion Coalition (“WTEC”). Leadership at Montana Generation, including myself, have been involved in developing utility-scale standalone solar projects, as well as solar and battery storage projects in Montana and Wyoming for over the last decade and have experience in interconnection and transmission issues within the region. The proposed plan to identify congested transmission areas on a region-wide basis and to develop an actionable plan to address region-wide capacity needs will help unlock renewable energy development throughout the west that has otherwise been delayed or terminated due to transmission-related issues. Montana Generation looks forward to participating in the WTEC process as it progresses and provides feedback below on the various questions posed by the WPP regarding the Concept Paper.

- 1. The participation structure should be inclusive and ensure a broad set of perspectives is considered so that decision-makers, policymakers and regulators have confidence in the results and recommendations.**
 - a. Does the proposed participation structure properly balance the objectives of inclusivity and expediency? If not, how could it be improved?**

Yes, I generally believe the proposed participation structure appropriately balances the objectives of inclusivity and expediency. I am encouraged by and support the plan to broaden

leadership representation to include inter-regional perspectives beyond the Pacific Northwest, particularly given the integrated nature of the transmission system in the Inter-mountain West and Pacific regions of the west. I support the idea of periodic public forums or workshops to share updates, decision points, and allow for opportunities for comment. I would request that such forums and opportunities for comment occur regularly to ensure stakeholders understand, and are given an opportunity to participate in, the work being done by the WTEC and the potential action items stemming from WTEC recommendations and decisions.

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

I believe the proposed structure provides appropriate transparency and encourage the plan to allow for opportunities for public comment on proposed decisions throughout the process.

2. The proposed participation structure outlines the organization of essential committees and engagement opportunities to support the effort.

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

Generally, the proposed composition of the committees and task force is a good start and appears to be inclusive of many different interest groups. Montana Generation appreciates the WPP's development of the list of members for the Steering Committee and Regional Engagement Committee; however, Montana Generation would request that the representation of independent power producers and independent transmission companies be increased in the proposed committees. Montana Generation recognizes that there are many different utilities within the western region and utility interests must and should be significantly represented on the committees, but requests that independent power interests likewise receive a comparative number of representatives on the respective committees as the utility interests. Montana

Generation believes that increasing the number of independent power producer and transmission company/organization representatives on the committees will lend to improved discussions by the WTEC and ultimately better decisions that flow from a representative group with balanced membership. Additionally, how decisions will be made by the committees in terms of simple majority, two-thirds, or unanimous consent will likewise impact decisions regarding the composition and structure of the committees. Accordingly, Montana Generation would also recommend that the WPP include details of the decision-making process within the proposal of the WTEC so that interested parties may better understand committee decision-making and the balance of the members involved in respective committees.

- 3. We anticipate working closely with neighboring regions to achieve a broad viewpoint.**
 - a. Is that intention clearly articulated in the concept paper and understood through the proposed participation structure? If not, what changes could be made?**

Yes, I believe the intention is clear that the WTEC intends to work with neighboring regions beyond NorthernGrid. As I noted above, Montana Generation respectfully believes that the number of independent power producer representatives should be increased on the committees. Representatives from independent power producers engaged in development in various states throughout the NorthernGrid footprint could each provide sub-region perspectives of transmission issues. Likewise, certain developers may have interconnection and transmission experience within NorthernGrid as well as neighboring transmission regions that would be beneficial to the WTEC. While Montana Generation believes that generally the emphasis of the WTEC's work should remain focused on the congestion and capacity issues within the NorthernGrid, Montana Generation supports the plan to include inter-regional perspectives.

4. **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.**
 - a. **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?**

Since the third-party is ultimately selected by the Steering Committee, Montana Generation believes that increasing the number of independent power producer representatives on the Steering Committee to ensure that the Steering Committee is comprised of a balanced group of representatives will lend greater confidence that a third party could provide independent analysis and recommendations. Additionally, what decision-making process will govern the selection of a third-party (i.e., whether the process is governed by a simple majority, two-thirds, or unanimous consent) will play into the amount of confidence that stakeholders would have in the independent analysis and recommendations.

CONCLUSION

Overall, Montana Generation is encouraged by the proposed WTEC. Transmission issues in the region continue to impact project development to the point of either significantly delaying projects or killing their development altogether. The development of the WTEC could serve as a catalyst towards overcoming current and future region-wide transmission issues that have delayed project development. Montana Generation looks forward to being involved and engaged in the WTEC process as it moves forward towards implementation.

Sincerely,

/s/ Mark Klein
Mark Klein
Manager
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