



**Western Transmission Expansion Coalition
Concept Paper for a West-Wide Transmission Plan October 2023**

Comments of NV Energy

October 31, 2023

NV Energy thanks the Western Transmission Expansion Coalition (WTEC) for the chance to comment on the Concept Paper. NV Energy agrees that targeted transmission expansions will be necessary to facilitate additional interregional transfers between the Northwest and the Desert Southwest in order to achieve decarbonization goals in a cost effective manner by enhancing the efficiencies of organized market least cost dispatches.

The Concept Paper proposes an additional approach outside the Order No. 1000 regional and interregional transmission planning process to develop an “actionable” transmission plan to address regional and inter-regional needs. A chief element of this approach would include retention of an independent consulting firm to conduct analysis with the goal of producing a West-wide, future looking 20 year transmission plan.

Overall, NV Energy supports an approach to engage in longer range scenario planning that can assist in identification of valuable regional and inter-regional transmission additions. One of the problems with a 20-year planning process is the uncertainty concerning the input assumptions. It is very difficult to determine what the future resource mix will be and where these resources will be located. It is equally difficult to determine how much future load growth will occur and the location of the load additions. Additionally, benefits can be related to the scope of organized market participation. Some of the uncertainty can be dealt with through scenario analysis.

While the WTEC effort began through discussions in the Northwest among entities from that region, the intent of the effort is to produce a West-wide study involving a broad range of Western participants. NV Energy strongly supports the drive toward greater inclusivity, but notes that the proposed Steering Committee is dominated by Northwest parties. This is not to suggest that these entities shouldn’t have a place on the committee; rather it will be vital to include IOU and public power members from the Desert Southwest to provide balance to the discussion and insight into their future needs.

NV Energy looks forward to future engagement on this initiative.