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Northwest **Power** and **Conservation** Council

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October 31, 2023

The Northwest Power and Conservation Council is pleased to submit comments on the Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan.

The power system in the West, and across the country, is undergoing dramatic and rapid change. Carbon reduction policies and market initiatives, as well as cost reduction, have driven the development of carbon free resources, primarily wind and solar. These same dynamics are leading to the retirement of some existing thermal resources, primarily coal, throughout the West. At the same time, loads are increasing, driven by electrification of end uses and an increase in large industrial loads, including data centers. While the exact pace of load growth is uncertain, it's clear that the region will need to develop more demand and supply side resources to meet needs. With any new generation comes the need to ensure sufficient transmission to bring resources to load. These new resource and transmission needs need to be identified and planned for now. The Council urges comprehensive solutions that optimize resource and transmission additions to meet the growing needs in the most efficient and economical way feasible.

The Council applauds the Western Power Pool, Bonneville Power Administration, and all the entities that came together recognizing the value in evolving the transmission planning activities in the West to help address the challenges ahead. The Council endorses the framework outlined in the concept paper and wants to express its willingness to support this effort however possible.

Specifically, the Council is prepared to participate in the Technical Task Force as proposed. One primary role of the Council is to develop a regional electric power plan that ensures an adequate, efficient, economical, and reliable power supply. The Council can leverage the insights gained through our power planning efforts and annual studies on resource adequacy to help shape the scope and approach of the study. One specific area of expertise is the Council's deep understanding of demand side resource potential (including energy efficiency, demand response, and other distributed energy resources) and its ability to defer some of the generation and transmission builds. The Northwest

has been successful in developing energy efficiency as a resource, maximizing the value of the existing system to the benefit of the region's consumers. The Council looks forward to participating in this task force and bringing all our insights in comprehensive resource planning to help shape work and support the development of a transmission plan that is comprehensive and mindful of resource development needs and trade-offs.

The Council endorses the frame of ensuring a transparent and inclusive process. An important pillar of the Council's work is to ensure broad participation and transparency of analysis and decision making. The Council has developed strong relationships with the States and the Tribes and has a specific committee focused on public affairs and engagement. The Council is open to exploring other ways we can bring our expertise and relationships to support the goals of ensuring inclusivity and transparency throughout the transmission planning effort.

Sincerely,

A handwritten signature in black ink that reads "Jeff Allen". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Jeff Allen, Chair