



Oregon

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State Land Board

November 2, 2023

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Secretary of State

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Subject: Comments on the Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan

Dear Sarah Edmonds,

The Oregon Department of State Lands appreciates the opportunity to provide comments in response to Western Powerpool's proposed Concept Paper for a West-Wide Transmission Plan to support the needs of the future energy grid.

The Department of State Lands (DSL) is the administrative agency of the State Land Board with a mission to ensure Oregon's school land legacy and protect wetlands and waterways of the State through superior stewardship and service. DSL has a regulatory and land management role in the siting and construction of transmission infrastructure on state-owned waterways (including the territorial sea), uplands owned and managed by DSL, and wetlands and waters of this state. DSL reviews and authorizes easements for transmission lines and infrastructure on DSL-owned lands (uplands and state-owned waterways). DSL also issues removal-fill permits to work in wetlands, rivers, streams, lakes, and other state waters. The transmission infrastructure project may involve the construction and siting of power cables, pipelines, and other utilities that would require the removal, fill and alteration of sediments, rock, and other materials. The volume threshold for requiring a permit varies depending on the waterway being impacted. Thus, transmission infrastructure projects may need both an easement and a removal-fill permit from DSL.

Within the territorial sea, transmission infrastructure is one of the challenges that need to be addressed in the Pacific Northwest, considering the fast development and research on smart cables and renewable energy (e.g., offshore wind energy, solar, hydropower, and hydrogen), including wave-energy devices which will populate the ocean in the upcoming years. In September 2022, the Oregon Department of Energy prepared a report "Floating Offshore Wind: Benefits and Challenges for Oregon" which stated

the transmission infrastructure as one of the challenges. DSL is currently working with our state agency partners to address some of the challenges through updates to Oregon's Territorial Sea Plan.

DSL appreciates the work on developing the Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan.

DSL is pleased to provide the below comments for the Western Powerpool (WPP) consideration, with the hope these comments will be informative and helpful in guiding further work on developing the Western-Wide Transmission Plan.

1. Problem definition, goals, objectives, and scope should be coherent, clear, and measurable.

Section 1.1 of the Concept Paper defines a problem as follows:

“...there is a concern that current transmission planning frameworks in the West do not result in sufficient transmission solutions to support the needs of the future energy grid, which are challenged by the dynamically changing resource mix, the devastating impacts of extreme weather events, and forecasts for significant industrial and electrification load growth, among other drivers.”

The Concept Paper also states that “the legal and regulatory structure has not resulted in the identification of new transmission solutions that result in transmission builds.”

The statement above does not define a problem clearly, and Section 1.1 does not explain how this problem will be solved through different methods (e.g., case studies, interviews, surveys, and observations), planning process, and activities. The Concept Paper mentions the ‘sufficient transmission solutions’ several times. However, there is no definition of what ‘sufficient transmission solutions’ means and what could be examples of such solutions for the West.

Section 1.2 of the Concept Paper describes goals and objectives. It might be helpful to state that a goal is developing a West-Wide Transmission Plan and then list the objectives to achieve it. The objectives should be measurable outcomes to help the Western Transmission Expansion Coalition measure progress toward accomplishing the goal. The Concept Paper does not state how those objectives would be measured, particularly reliability, fair and unbiased, and transparency.

The Concept Paper proposes to exclude from its scope outputs and recommendations relating to transmission construction, siting, and permitting. However, these are essential components of the Transmission Plan that would help to achieve specifically reliability, fair and unbiased, and transparency objectives. If those components are excluded, it is not clear what the Transmission Plan's scope is.

Section 1.3 states that this Concept Paper does not include a detailed technical scope and, instead, proposes to set up structures of organizational committees that would define the detailed technical scope and other stakeholder participation opportunities to support the effort.

It is reasonable to establish organizational committees, technical task force, and regional engagement committees at the beginning stage. However, if the name of the proposed document is “Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan,” the specific and measurable goals and objectives, as well as technical scope, should be initially identified clearly for developing a Transmission Plan. This approach will help to determine specific organizations and

stakeholders that need to be involved in its development. If the goal of this document is to establish organizational committees and task force at first glance and not to develop a Transmission Plan at this stage, then it would be appropriate to name this document “Concept Note for Establishing the Western Transmission Expansion Coalition for Developing a West-Wide Transmission Plan.” The Concept Paper should also include sections on budget/finance, project timeline, and contact information.

2. Planning criteria should be included.

The Concept Paper lacks planning criteria for the Transmission Plan’s development process. At the initial stage, the process would benefit from identifying the constraints, standards, and guidelines that determine what the Western Transmission Expansion Coalition will or will not consider during planning. Planning criteria may include the assessment of the conventional grid, examining the grid’s reliability requirements, key study areas, potential transmission infrastructure limitations, and opportunities for infrastructure reinforcements that improve reliability and efficiency.

Also, we suggest that the Concept Paper should include statements on how the Northern Grid Transmission Plan, the Bonneville Power Administration Transmission Plan, and the West Coast Offshore Wind Transmission Study prepared by the Pacific Northwest National Laboratory will be considered in the proposed Transmission Plan.

DSL thanks Western Powerpool for considering these comments and looks forward to collaborating with WPP and the Western Transmission Expansion Coalition as topics pertain to DSL’s regulatory and land management responsibilities in Oregon.

Please don’t hesitate to reach out to our Submerged Cable Analyst, Nataliya Stranadko, to discuss any of these comments or issues further.

Sincerely,

Dana Hicks
Planning and Policy Manager

Contact Information

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