

## PNM Comments on WTEC West-Wide Transmission Plan

PNM supports the Western Power Pool (WPP) in its effort to develop a West-wide transmission plan. PNM wishes to actively participate in on-going discussions facilitated by the Western Transmission Expansion Coalition (WTEC) group. With multiple efforts in the West targeting improvement in the transmission planning sphere, PNM believes WPP has the history and momentum to make valid progress.

PNM appreciates the opportunity to submit comments on the following questions and additional topics.

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.

- Does the proposed participation structure properly balance the objectives of inclusivity and expediency? If not, how could it be improved? **PNM understands that WTEC discussions on the participation structure and composition began with a focus on the Pacific Northwest. However, the final structure proposal needs more targeted inclusion of wider West regions throughout the committees. The Desert Southwest needs more defined participation to be on equal footing.**
- Does the proposed participation structure provide appropriate transparency, including how the inputs and assumptions are determined? If not, how could it be improved? **The proposal does not have enough detail on how transparency would be ensured throughout the decision-making process on inputs and assumptions. However, given that the proposal and existing organization structure is similar to WRAP origins, PNM is confident that transparency will be adequate.**

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

What suggestions do you have about the composition of the committees and task force, and engagement with States and Tribes? PNM believes the proposed state and tribal inclusion in the committees as appropriate and adequate. **PNM believes the structure of the committees is logical, however, we would encourage more discussion surrounding the composition. For example, the Regional Engagement Committee has so many sectors that the position of investor-owned utilities, responsible for a large part of transmission infrastructure and investment, is diluted. This structure is problematic given the obligation that investor-owned utilities have with owning and investing in transmission infrastructure. Additionally, as mentioned above, there is unequal regional composition in the proposed Steering Committee and Technical Task Force. The Desert Southwest should have equal representation similar to those proposed for the Pacific Northwest Utilities Conference Committee and the Northwest & Intermountain Power Producers Coalition.**

3. We anticipate working closely with neighboring regions to achieve a broad viewpoint.

Is that intention clearly articulated in the concept paper and understood through the proposed participation structure? If not, what changes could be made? **The intention is communicated; however, the participation structure needs to adequately achieve equal regional representation as mentioned in the responses to the above questions.**

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.

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? PNM has confidence that an independent party could achieve the necessary results inclusive of all stakeholders. PNM believes the makeup of the Technical Task Force needs greater regional diversity.

Additional PNM Comments:

While the proposal does touch on supporting future cost allocation decisions by providing data on estimated benefits that result from the regional plan, PNM encourages active discussions on direct cost allocation. Avoiding these discussions risks undermining any potential progress that this leadership seeks.

PNM believes the WTEC should openly target discussions on cost allocation and recommend a structure or responsibility for decision-making. For example, NorthernGrid and WestConnect do not struggle to develop regional plans from an engineering perspective, they struggle to confront cost-allocation discussions with non-FERC jurisdictional entities. PNM believes WTEC should also enable discussions on recommended responsibility for state involvement with siting and permitting decisions.

Given the multiple efforts currently arising within the transmission planning sphere, PNM supports having early stakeholder discussions on how these efforts could fit together to tackle all aspects of transmission development stagnation including cost allocation, siting and permitting reform, and funding models.

PNM also supports ensuring entities with direct responsibility for transmission infrastructure ownership and investment obligations are weighed appropriately in all proposed committees.