

**Powerex Comments on the Western Transmission Expansion Coalition Development of a
West-Wide Transmission Plan Concept Paper**

Powerex Corp. appreciates the opportunity to comment on the Western Transmission Expansion Coalition (WTEC) Development of a West-Wide Transmission Plan Concept Paper developed by the Western Power Pool (WPP). Powerex agrees that transmission expansion across the west is a critical element in achieving reliability, economic efficiency, and decarbonization objectives. Powerex also commends the goal to develop an actionable transmission plan for the west with a scope expanded beyond the scope of Order 1000.

As identified in the Concept Paper, achieving an actionable transmission plan for the region requires a fair and unbiased approach for all stakeholders. WPP is in a unique position to be able to provide this necessary independence for the region and is well suited to organize this effort. It is also clear that WPP recognizes the importance of transparency in the process.

Powerex appreciates that the WTEC is striving to achieve both inclusivity and expediency. West-wide inclusivity should include balanced regional representation from the Northwest, Southwest, and Rockies as well as the California Independent System Operator (CAISO) and the Southwest Power Pool (SPP) as the two market operators in the west. SPP is notably missing from the draft Concept Paper given that SPP will provide transmission planning for its Regional Transmission Organization (RTO) in the west, is the Program Operator for WPP's Western Resource Adequacy Program with forward showing requirements that achieves deliverability using high priority OATT transmission rights and will also be the market operator for its Markets+ organized market for the west.

In addition to including Transmission Service Providers (TSPs) across the region, it will be important to include the perspective of customers subscribing for long-term firm Open Access Transmission Tariff (OATT) service, as in the west transmission expansion depends upon the existing OATT subscription model. As an OATT customer of multiple TSPs, Powerex has third party transmission service rights on many of the systems across the western interconnect and has directly contributed to upgrade/expansion efforts. In addition, Powerex is a wholly owned subsidiary of BC Hydro, a TSP that is part of the inter-regional footprint. As a result, both BC Hydro and Powerex provide meaningful perspectives toward these coordinated transmission planning efforts and Powerex can represent these interests (while coordinating with BC Hydro). As such, Powerex appreciates being included in the WTEC Steering Committee effort.

Thank you for considering Powerex's comments on the Concept Paper and we look forward to future developments of the structure and scope.