

To: Sarah Edmonds, President & CEO, Western Power Pool
From: Emily Moore, Director of Climate & Energy, Sightline Institute
Subject: Comments on Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan
Date: October 31, 2023

Dear Sarah,

Thank you for the opportunity to comment on the West-Wide Transmission Plan Concept Paper. Sightline Institute is a leading independent research and policy organization in the Pacific Northwest. Our analysis supports the need for [improved planning](#) of the electric transmission system, and we are glad to see the Western Transmission Expansion Coalition's (WTEC) proposal. We are supportive of the goals laid out in the Concept Paper and are pleased to offer the following recommendations for further strengthening the proposal.

(1) Make clear how the planning process inputs and resulting “actionable transmission plan” are consistent with climate laws and commitments.

One of the main shortcomings of transmission planning today is that it, by and large, does not “work backwards” from climate policies, such as Washington and Oregon’s clean electricity mandates or electrification targets. As such, policymakers and advocates are left unsure of how much more transmission capacity the region needs to meet these goals, as well as when the region will need new transmission facilities and where. WTEC’s proposed transmission planning process should make explicit how it incorporates climate goals and statutory requirements into its analysis, including those around emissions reductions, fossil fuel resource retirements, and electrification. Additionally, the “actionable transmission plan” that results from this process should clearly demonstrate how it will facilitate achieving relevant targets over the next 5, 10, 15, and 20 years.

(2) Minimize the environmental, cultural, and land use impacts of new transmission facilities.

We agree with the Concept Paper’s proposal to exclude from its scope outputs relating to construction, siting, and permitting. However, many challenges related to siting and permitting can be resolved through better planning, including by proactively assessing proposed routes for their cultural and environmental impacts and identifying opportunities to upgrade or enhance existing lines. We recommend that the planning process explicitly analyze how to minimize the need for brand new lines and propose corresponding solutions in the final output. Additionally, we recommend that both the inputs and outputs of the analysis include assessments of environmental and cultural impacts. For example, two of the inputs that the proposal mentions are “identification of renewable energy zones” and “resource expansion,” which could have implications for environmental and cultural impacts. Environmental groups and Tribes will need to be actively involved in these discussions and decisions. We offer suggestions for how to strengthen their engagement in recommendation (3) below.

(3) Strengthen engagement by state representatives, environmental groups, and Tribes.

We appreciate the diverse set of stakeholders that WTEC proposes to include in the process and the need to balance inclusivity and expediency. However, we are concerned that the proposed committee structure could sideline state representatives, public interest groups, and Tribes, replicating a challenge

with the status quo transmission planning processes. In the proposal, the Steering Committee holds all decision-making power, including over selecting the independent consultant, directing the technical task force, and developing the actionable transmission plan. However, the Steering Committee does not include any Tribal or public interest group representation. While we appreciate that the Regional Engagement Committee (REC) includes a wider set of stakeholders, it is still disproportionately made up of utilities and power producers. We recommend broadening the Steering Committee to include public interest groups and Tribal representatives and/or granting decision-making authority to the REC over key parts of the process, rather than simply asking the REC to provide input to the Steering Committee. We think it is especially important that states, environmental groups, and Tribal representatives agree to the selection of the independent consultant, the scope of work, the scenarios, and the criteria or screening tools the consultant will use to analyze the scenarios.

(4) Lay out explicit processes for transparency and accountability.

Limited transparency over existing transmission planning processes is a major challenge and one we are glad to see this proposal tackle through its stated goals and objectives. We recommend additional ways to improve transparency beyond the “frequent communication with stakeholders” and “transparency about the modeling inputs and assumptions” that the Concept Paper already states. Specifically, we recommend: sharing clear timelines and deadlines upfront for all steps of the process; giving all stakeholders ample advance notice to review inputs, assumptions, and outputs (rather than sharing information and requesting feedback live during a meeting); recording and disseminating all committee meetings; making sure that each committee has access to the same information (including developing a way to share and protect data that may not be currently public); and identifying a point person whom all stakeholders can go to for additional information and expect a timely response.

Thank you for the opportunity to provide these comments and for your efforts to improve transmission planning in the West. I welcome the opportunity to answer any questions or speak further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Emily Moore', with a long horizontal flourish extending to the right.

Emily Moore
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