Southern California Edison's (SCE's) Comments on Western Transmission Expansion Coalition Concept Paper for a West-Wide Transmission Plan

SCE appreciates the opportunity to review the Western Transmission Expansion Coalition Development of a West-Wide Transmission Plan Concept Paper ("Concept Paper"). SCE supports the objectives described in the Concept Paper, including the development of a western-wide view that can inform transmission planning effectively and in coordinated fashion. While SCE shares the goal of ultimately developing an actionable transmission plan, SCE suggest that a more viable and feasible approach would be to first develop a work product akin to the CAISO's 20-year outlook. The CAISO's 20-year outlook provides a baseline to establish expectations for longer-term planning, recognizing that resource planning and procurement decisions may differ over the years ahead from some of the assumptions used to establish this baseline. For the CAISO's outlook, those changes will be managed by adapting future plans around the baseline architecture in subsequent updates and in the CAISO's annual transmission planning processes that approve and initiate specific projects.

A 20-year outlook for the western region could feed into other regional planning efforts in the west to take the next step towards an actionable transmission plan. This outlook approach would make the most productive use of stakeholder's time given the many challenges that would need to be addressed for any transmission projects identified in the plan to move forward, including cost allocation, identification of project sponsors, integration with other tariff-based planning processes, siting/permitting, etc.

SCE looks forward to being an active participant in this west-wide transmission planning effort, including through the Regional Engagement Committee and/or Technical Task Force.