

October 31, 2023

VIA ELECTRONIC EMAIL (sarah.edmonds@westernpowerpool.org)

Western Power Pool
Sarah Edmonds, President and CEO
7525 NE Ambassador Place, Suite M
Portland, Oregon 97220

RE: Informal Comments Regarding WPP's Western Transmission Planning Concept Paper

To Whom It May Concern:

Southwest Power Pool ("SPP") appreciates the opportunity to submit these comments in response to Western Power Pool's ("WPP") request for feedback on its paper entitled, "Western Transmission Planning Concept Paper" ("Concept Paper"). Transmission is a critical aspect of an evolving energy landscape in the Western Interconnection, and having a coordinated, effective transmission planning framework will enable utilities and stakeholders to achieve renewable-energy goals, reinforce system reliability and leverage new opportunities to buy, sell and trade power. SPP looks forward to engaging in the Western Transmission Expansion Coalition ("WTEC") to support the development of a West-Wide Transmission Plan.

I. Background of SPP and Expansion into the Western Interconnection

SPP is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP has coordinated the reliability of the bulk electric grid for more than 80 years. SPP was founded in 1941, incorporated in 1994, approved by the Federal Energy Regulatory Commission ("FERC") as a Regional Transmission Organization ("RTO") in 2004¹ and has grown and matured steadily throughout its history, constantly expanding its service offerings and territory to provide greater value to a continually growing and diverse group of customers. Today, the SPP RTO footprint covers all or parts of 15 states, including some transmission facilities that are located in the Western Interconnection.

Since November 2020, SPP has been working with numerous entities to evaluate the benefits of SPP RTO expanding by utilities' placing transmission facilities in the Western Interconnection under the terms and conditions of SPP's Open Access Transmission Tariff

¹ *Sw. Power Pool, Inc.*, 109 FERC ¶ 61,009 (2004), *order on reh'g*, 110 FERC ¶ 61,137 (2005).

(“Tariff”). With the recently announced commitments from seven entities to join the SPP RTO,² SPP anticipates its wholesale electricity market, resource adequacy program, and other regionalized services, such as transmission planning to help western members achieve renewable-energy goals, reinforce system reliability and leverage new opportunities to buy, sell and trade power.

II. SPP’s Comments.

SPP provides the following responses to the questions posed by the WPP:

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.

Questions:

a. Does the proposed participation structure properly balance the objectives of inclusivity and expediency? If not, how could it be improved?

RESPONSE:

SPP commends the development of the WTEC as discussed in the Concept Paper for a West-Wide Transmission Plan that addresses grid capability, reliability, and resiliency challenges in the Western Interconnection. The theme of “Inclusive”, as described in the Concept Paper, is to ensure that a broad set of perspectives is considered so that decision-makers, policymakers, stakeholders, and regulators will have confidence in the results and recommendations. As a multi-state RTO who will be responsible for transmission planning for seven utilities in the Western Interconnection, Additionally, as an RTO in the Western Interconnection, SPP will be required pursuant to FERC Order No. 1000³ to coordinate, through their regional transmission planning process, with each of their neighboring transmission planning regions within the Western Interconnection to implement interregional transmission coordination procedures.

SPP respectfully requests to participate as a member in the WTEC Steering Committee. As discussed above, while SPP is already a transmission provider in the Western Interconnection, that role is expected to significantly increase with the recently announced RTO expansion. Any discussion related to more holistic and coordinated transmission planning in the Western Interconnection will benefit from the participation and experience of SPP.

² See SPP announcement entitled, “SPP RTO will expand with commitments from western utilities”, posted at www.spp.org on September 14, 2023.

³ Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), order on reh’g, Order No. 1000-A, 139 FERC ¶ 61,132, order on reh’g and clarification, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), aff’d sub nom. S.C. Pub. Serv. Auth. v. FERC, 762 F.3d 41 (D.C. Cir. 2014).

b. Does the proposed participation structure provide appropriate transparency, including how the inputs and assumptions are determined? If not, how could it be improved?

RESPONSE:

The goal of “Transparency” as described in the Concept Paper is to ensure transparency in the process and about the modeling inputs and assumptions. As an RTO with responsibility for transmission planning in the Western Interconnection, SPP’s full participation in the WTEC process will be critical as SPP will collect data, construct models, and perform planning analysis on behalf of its members in the West. Having this data and the accompanying analysis coordinated with others in the West will be important to facilitating the development of a West-Wide Transmission Plan that can be supported by stakeholders and regulators.

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

Question:

a. What suggestions do you have about the composition of the committees and task force, and engagement with States and Tribes?

RESPONSE:

See the Responses to Question 1(a) and 1(b).

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

Question:

a. Is that intention clearly articulated in the concept paper and understood through the proposed participation structure? If not, what changes could be made?

RESPONSE:

See the Responses to Question 1(a) and 1(b).

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.

Question:

a. 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?

RESPONSE:

Other than what is discussed in the Responses to Question 1(a) and 1(b), SPP has no opinion as relates to this question.

SPP appreciates the opportunity to respond to WPP's questions regarding the WTEC.

Sincerely,

A handwritten signature in blue ink that reads "David Kelley". The signature is written in a cursive style and is positioned above a solid horizontal line.

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