

**WECC comments in response to  
The Western Transmission Expansion Coalition (WTEC) Concept Paper  
as presented by WPP**

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On October 2, 2023, the Western Power Pool (WPP) released a Concept Paper to discuss approaches to address current transmission planning frameworks in the West and whether the existing frameworks result in sufficient transmission solutions to support the needs of the future energy grid. WECC appreciates the opportunity to comment on this Concept Paper.

There are numerous transmission planning efforts underway in the Western Interconnection. The ideal outcome of these endeavors would be an interconnection-wide collaboration, including everyone from planners to policymakers, that results in an actionable product. Sub-regional efforts have been compliant with FERC mandates and contemplate collaboration between sub-regions to build regional transmission lines. However, these efforts have not resulted in regional transmission being built. In addition, sub-regional efforts do not take advantage of economic efficiencies that can be captured through interconnection-wide partnership and participation. A product upon which others can – and will – take action will only occur if there is a high degree of confidence in how the process is created and undertaken.

WECC strongly supports the goals and objectives identified in the WTEC Concept Paper. An analysis that focuses on reliability and seeks to coordinate efforts in order to capture efficiencies and consider appropriate cost allocation is more likely to result in projects that will actually be built. WECC's mission and role is to ensure reliability – without necessarily considering the cost implications to the consumer. However, WECC acknowledges that the cost implications and decisions on allocation risk derailing the conversation, collaboration, and eventual build of needed transmission in the West. Accordingly, consideration of a portfolio of projects is more likely to receive consideration that can result in action. A portfolio presents a different value proposition to be considered by the diverse interests in the West. More importantly, focusing on the projects most needed for reliability avoids complications if/when projects are considered for purely policy reasons.

WECC's anchor data set can serve as a significant input for the anticipated and necessary studies and scenarios. As an independent, resource-neutral organization with an interconnection-wide view, our data can serve to increase confidence in the products as they develop. Moreover, WECC is in the final stages of producing its first Transmission Trends Assessment. This assessment will identify areas and corridors where transmission is constrained under various scenarios. The Inter-regional Transfer Capability Study mandated by Congress will also reveal where constraints exist and where prudent additions to transfer capability may benefit reliability. The development and results of these studies can further compliment the work anticipated and suggested by the WTEC. We look forward to harmonizing these and other efforts in order to avoid duplication, increase confidence and produce a more fully contemplated final product.

In sum, WECC looks forward to partnering with the Western Power Pool and the WTEC in its efforts to form an interconnection-wide opportunity to identify – and build – needed transmission. We intend to fully participate in the conversation and the committee structure as it develops.