

Xcel Energy appreciates the opportunity to review the WTEC Concept Paper and provide comments. We believe efforts such as WTEC are necessary to enable the unprecedented change in meeting customer demand for energy now and in the future.

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.

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

Xcel Energy Response: The proposed structure aligns well with other successful long range planning efforts that have taken place but could be improved. One improvement that could be made is additional detail on how individual entities can best participate in each Committee and Task Force. This would be very valuable to entities with limited resources that are looking to contribute to the end product but may not have the bandwidth to provide strategic input and guidance. Additional detail on expected time commitments for participants would also be helpful as those become better defined.

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

Xcel Energy Response: The proposed structure offers several opportunities for entities to participate and access study data and status, but lacks detail on timing of data availability or recurrence of outreach. This may be better developed in the scoping stage, but would be beneficial to state and local governments (including tribal involvement), as well as other agencies that may need to allocated, or enlist new resources to cover this effort.

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

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

Xcel Energy Response: We recommend inclusion of representation specific to the eastern states and utilities of the Western Interconnection. This will enable greater participation by those entities as well as allow greater opportunity for collaborative planning within that footprint to better enable a west-wide transmission expansion.

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

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

Xcel Energy Response: There is a clear goal of collaboration in the concept paper, but also a focus on what isn't working. We feel that some examples of approaches that are working that would align with and support the goal of WTEC would add valuable context. For example, Xcel Energy's Colorado Power Pathway and the associated resource plan, the PAC Gateway projects and SunZia/Southline that are taking similar approaches and would enable greater electrical connections within the West. We also

believe that the Southwest Power Pool and perhaps the Midcontinent ISO may have valuable interest and input into this study as there are likely to be transmission projects between the western and eastern interconnection that could be identified.

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.

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?

Xcel Energy Response: We believe working with an independent party to coordinate the input and analyze a set of agreed upon scenario is vital to these efforts by limiting the appearance of bias. The independence of that resource needs to be firmly under the direction of the governing body, in this effort that would be the Steering Committee, to ensure input is being considered in a fair and equitable manner. To enable this, we recommend clear rules about inclusion and transparency of feedback as well as clear rules on dispute resolution and gaining agreement on input assumptions and scenarios.