

Scott and Brad,

Thank you for giving SPSC representatives the opportunity to clarify and further support several of our key recommendations for the 10-year plan. Our goal is to offer recommendations that reflect discussions among SPSC members focusing on changes to the plan and its process that will add value to states and provinces.

During the TEPPC discussion, the SPSC focused on five key recommendations, reflecting the outcome of a meeting among several SPSC representatives Tuesday evening to identify top priorities. We believe these identified priorities reflect areas of strong agreement and support reached among SPSC members during our discussion of the development of the plan over the last several months.

We believe that much of the concern expressed over these SPSC recommendations centered on a few words, more than our overall message. Therefore, we are offering language here that we believe satisfies these concerns, while strengthening the plan for states and provinces. We ask that you again give consideration to the following recommendations.

Insert in Introduction, at page 10, line 8, after “environmentally sound”:

1. *State and provincial decision-makers have made it clear that to help guide such decisions, the Plan should:*
  - address a **robust transmission system** over a wide range of plausible futures;
  - identify significant and demonstrable economic efficiency benefits that can be captured through transmission line expansion; and
  - identify transmission additions that if foregone or delayed will result in significantly diminished opportunities to develop infrastructure that would be desirable over a likely range of futures.*WECC has begun to address these needs of policy-makers in the current plan and is intent on further meeting them in future plans.*
2. In the discussion of Montana to Northwest and the Pacific Tie Paths in the **Executive Summary**, insert this statement:
  - *In the future, evaluation of specific paths should also consider impacts on reliability, overall system costs and economic benefits, and the interest of buyers in procuring renewable resources that would be delivered over the path.*
3. **Insert in Section 4.9, Gaps in regional transmission planning processes:**
  - *Future plans should expand interconnection-wide the economic analysis of resource relocation cases and transmission expansion.*
4. **Insert in Section 4.9, Gaps in regional transmission planning processes:**
  - *Future plans should test potential transmission expansion solutions against a broad range of alternative futures with major public policy implications.*
5. **Insert in Section 4.9, Gaps in regional transmission planning processes:**

**Comment [TC1]:** This insert follows the point that the objective of the Plan is to inform decision-makers.

**Comment [TC2]:** Inserted to emphasize this is an important objective of states and provinces

**Comment [TC3]:** Change “reliable” to avoid issues raised during discussion

**Comment [TC4]:** Sentence inserted to acknowledge WECC’s responsiveness to these state and provincial objectives.

**Comment [TC5]:** SPSC’s original comment had an extensive text for a proposed insert on Key Transmission Findings. We believe this is a very important item that needs to be stated up front in the executive summary that was not included in WECC’s revised text.

We want this somewhere in the summary of this topic.

**Comment [TC6]:** We believe this was the agreed upon text. We added 3 words in redline to make it a complete sentence.

**Deleted:** E

**Comment [TC7]:** We eliminated the reference to using a group of experts to test transmission solutions.

**Comment [TC8]:** (1) We took out the word “stringent” per request from SCG.  
(2) We changed (ii) from “fully permitted” to “permitted” per the discussion.  
(3) We softened the request by stating – “Projects on this list should include such criteria as”  
(4) We took out “objective” in (iii) to give the SCG some flexibility in arriving at their criteria

- *In future transmission plans adopt a more objective and consistent set of criteria for identifying projects on the Foundational Projects List. Projects on this list should include such criteria as: (i) under construction, (ii) permitted or (iii) meet other criteria that provide a very high level of confidence the project will be built over the 10-year time horizon.*

**Deleted:** otherwise

**Deleted:** objective

We look forward to discussing these suggestions with you as you make your final decisions on the text of the plan.

Thank you.

Tom and Steve