

**Comments of the State-Provincial Steering Committee (SPSC) on the
SPG Coordination Group (SCG)
2022 Common Case Transmission Assumptions
November 14, 2011**

The State-Provincial Steering Committee (SPSC) would like to thank the SPG Coordination Group (SCG) for the opportunity to comment on its draft 2022 Common Case Transmission Assumptions (CCTA) report.

In 2010, the SPSC recognized the important role that SCG serves in developing the list of Foundational Projects as the transmission projects expected to be built and online by 2020. The list has implications for subsequent modeling and the resulting transmission plan. In 2011, SPSC has made it a high priority to ensure that such assumptions on future transmission additions are created in an open, transparent and credible process.

General Comments

SPSC commends the SCG for using an open process in developing the current draft 2022 CCTA list of projects. We agree with the SCG's decision to utilize WECC's Project Information Portal (PIP) as the common source of publicly available information on which to base decisions about the CCTA. We also acknowledge that SCG held several public meetings with web access to all interested parties in developing the draft CCTA. Additionally, SCG conducted outreach that included webinars and participation in other meetings including the SPSC meetings in 2011. SPSC observes that SCG has been responsive to stakeholder input during the current year.

SPSC believes the SCG has made good progress in developing objective criteria and a transparent, repeatable process for making decisions on the CCTA project list. We believe the four criteria identified on page 7 of the draft report are reasonable and sound parameters. Moreover, the decision making process represented in the diagram on page 6 provides a rational framework for review and accountability. The combined process and criteria provide a reasonable and transparent basis on which to identify transmission projects likely to be constructed and in-service by the target date of 2022.

The SPSC finds that SCG's draft report in 2011 reflects significant improvements over the process employed in 2010. We are more comfortable with the new CCTA process leading to reasonable transmission input assumptions for WECC's 2022 Common Case and the starting point for TEPPC 2011 and 2012 study programs.

Specific Comments

SPSC identified a number of items in the draft CCTA report that warrant clarification, revision, or additional review.

First, the SPSC found that the draft CCTA report does not explain to the reader why projects not yet under construction were deemed to have passed the tests set out in Criteria 3 and Criteria 4. SPSC recommends that SCG should clearly explain the following:

For each CCTA project found to be of regional significance but not yet under construction, explain which of the Criteria 3 Financial Indicators and which of the Criteria 4 Project Implementation Status Indicators were satisfied or met.

Second, SPSC recommends that SCG address issues identified below regarding specific projects on the CCTA list based on the SPSC review:

1. Reevaluate project #22, San Luis Valley-Calumet-Comanche, based on recent actions by Xcel Energy calling into question its future participation in the project.
2. For project #18, Path 8 Upgrade/Colstrip Transmission Upgrade, clarify and distinguish between the western and eastern portions or segments of the project in the Executive Summary Map (page ii), in the Selection Criteria and Exclusions sections of the report on pages 8 and 9, and in Appendix C-6.
3. For project #26, Walla Walla to McNary (Energy Gateway Segment A), confirm whether this is the correct project description vs. Wallula to McNary.
4. Project #7, Gateway Central Project: Sigurd-Red Butte, and Project #26, Walla Walla to McNary (Energy Gateway Segment A) are included in PacifiCorp's current integrated resource plan, which is being reviewed by the Oregon Public Utility Commission and has not been "acknowledged."

Thank you for inviting stakeholder input into the draft 2022 CCTA report. The SPSC will also file these specific comments pursuant to the instruction in the October 23 memo from Brad Nickell, incorporating them directly in the text of the draft report.