

**ADVICE OF THE
WESTERN INTERCONNECTION REGIONAL ADVISORY BODY
TO THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
ON THE WESTERN ELECTRICITY COORDINATING COUNCIL'S
PROPOSED SCENARIO FOR THE LONG TERM RELIABILITY ASSESSMENT**

The Western Interconnection Regional Advisory Body (WIRAB)¹ submits advice to the North American Electric Reliability Corporation (NERC) and its Planning Committee regarding the Western Electricity Coordinating Council's (WECC) proposed scenario for the 2009 Long Term Reliability Assessment (LTRA).

Background

WIRAB supports the goals of NERC's LTRA to assess the long-run adequacy of the electric power system. We believe the 2007 LTRA identified important emerging issues that warrant closer scrutiny in future LTRA analyses such as increased penetration of renewable generation, future carbon regulations, and greater reliance on natural gas generation. We concur in the importance of these issues in the Western Interconnection and support efforts to improve our understanding of these challenges.

WIRAB has taken steps to encourage the development of timely and useful scenario analyses. On January 24, WIRAB submitted advice to WECC on a transmission expansion study request consistent with meeting carbon reduction goals. On January 30, WIRAB held a webinar on resource assessment and WECC's 2007 Power Supply

¹ Pursuant to Section 215(j) of the Federal Power Act (FPA), the Governors of ten States in the Western Interconnection submitted a petition with the Federal Energy Regulatory Commission (FERC) for the creation of the Western Interconnection Regional Advisory Body. On July 20, 2006, FERC issued an order establishing WIRAB. WIRAB members are appointees representing Alberta, Arizona, British Columbia, California, Colorado, Idaho, Mexico, Montana, Nebraska, Nevada, New Mexico, Oregon, Texas, South Dakota, Utah, Washington, and Wyoming.

Assessment report. On April 3, WIRAB held a workshop on assessments that included discussions about the LTRA, resource planner observations, and perspectives from FERC, NERC and WECC.² Based in part on these efforts, WIRAB has been monitoring WECC's effort to develop a study plan consistent with the objectives of the LTRA.

WECC Study Plan for the 2009 LTRA Scenario

WIRAB supports WECC's proposed study plan for the 2009 LTRA scenario. We believe this study plan correctly focuses on four key issues with increased penetration of renewable energy: (1) identifying conceptual transmission needed to develop enough renewable energy to reach a target 15% level of penetration; (2) analyzing the operational challenges to accommodate a high level of renewables and identifying solutions to meet the operational challenges, (3) assessing the impacts of fossil fuel demand and deliverability issues under a 15% renewable energy scenario; and (4) assessing the resource adequacy of generation to meet peak load and energy in the Western Interconnection.

WIRAB's study request to WECC's Transmission Expansion Planning Policy Committee (TEPPC) will incorporate a 15% renewable energy scenario and the associated transmission to support this amount of renewable generation. The TEPPC production cost modeling has been set up to study the year 2017. The TEPPC analysis does not lend itself to making a year-to-year assessments. Adequate data for this analysis will only be available for the year 2017. Additionally, year-by-year assessments would largely be guesswork because renewable generation development often occurs with much

² Workshop panelists included David Nevius, NERC; Louise McCarren, WECC; Commissioner Moeller and Shelton Cannon, FERC.

shorter lead times than conventional generation and year-by-year estimates would be highly speculative. The WECC approach meets the objective of evaluating how the system will adjust to increased levels of renewable penetration.

WIRAB Recommendation

WIRAB recommends that the NERC Planning Committee approve WECC's proposed study plan for the 2009 LTRA scenario.

Dated this 3rd day of June, 2007.

Respectfully submitted,

A handwritten signature in black ink that reads "John F. Savage". The signature is written in a cursive, flowing style.

John Savage, Chairman
Western Interconnection Regional Advisory Body