

Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Allumia
 Alternative Energy Resources Organization
 Ameresco
 American Rivers
 Backbone Campaign
 Beneficial State Bank
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Byrd Barr Place
 Citizens' Utility Board of Oregon
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 CleanTech Alliance
 Climate Smart Missoula
 Climate Solutions
 Community Action Center of Whitman County
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Earth and Spirit Council
 Earth Ministry
 Ecova
 eFormative Options
 Energy350
 Energy Savvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 EQL Energy
 Forth
 Global Ocean Health
 Home Performance Guild of Oregon
 Housing and Comm. Services Agency of Lane Co.
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 Interfaith Network for Earth Concerns
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Montana River Action
 National Center for Appropriate Technology
 National Grid
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest EcoBuilding Guild
 Northwest Energy Efficiency Council
 NW Natural
 OneEnergy Renewables
 Opower
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Energy Fund
 Oregon Environmental Council
 Oregon Physicians for Social Responsibility
 OSEIA
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation Inc.
 Portland General Electric
 Puget Sound Advocates for Retired Action
 Puget Sound Cooperative Credit Union
 Puget Sound Energy
 Renewable Northwest
 Save Our Wild Salmon
 Seattle City Light
 Seinerger
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Small Business Utility Advocates
 Smart Grid Northwest
 Snake River Alliance
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeast Idaho Community Action Partners
 Spark Northwest
 Spokane Neighborhood Action Partners
 Sustainable Connections
 The Climate Trust
 The Energy Project
 Transition Missoula
 UCONS, LLC
 Union Of Concerned Scientists
 United Steelworkers of America, District 12
 US Green Building Council, Idaho Chapter
 Washington Environmental Council
 Washington Local Energy Alliance
 Washington Physicians for Social Responsibility
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps
 Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

May 8, 2018

To: NTTG Planning Committee

From: Fred Heutte, Senior Policy Associate,
 NW Energy Coalition (fred@nwenergy.org)

The NW Energy Coalition (NWECC) offers the following statement in support of the Public Policy Consideration study request as revised and dated April 26, 2018 by Wyoming Industrial Energy Consumers, Utah Association of Energy Users, Utah Associated Municipal Power Systems, Deseret Power, Utah Office of Consumer Services, and Utah Municipal Power Agency (Joint Parties).

The threshold question for this study request is whether it can potentially provide useful information about transmission needs and solutions as encompassed in the Order 1000 planning process.

The Joint Parties study request poses an important question: will the addition of planned and potential new wind and other renewable resources necessarily require the addition of billions of dollars of new transmission expansion, or could a more cost effective or efficient result be achieved with measures such as downward dispatch of existing thermal units.

The Federal Energy Regulatory Commission required consideration of public policy requirements and non-transmission alternatives in Order No. 1000 (see, for example, paragraph 148) and 1000-A (see particularly paragraphs 190, 205 and 215).

Furthermore, NTTG commendably developed procedures for including public policy considerations (i.e., potential laws and regulations not already on the books) that were included in the Order 1000 compliance filings by its jurisdictional members. Notably, those provisions were fully approved by FERC in October 2012 along with other related amendments to Attachment K.

Thus we believe the Public Policy Considerations study request submitted by the Joint Parties is well grounded in FERC's requirements and intentions for Order 1000 regional planning, and by the specifications of Attachment K for NTTG's jurisdictional members.

The Joint Parties letter of April 26, 2018 notes:

"In particular, the Joint Parties have concerns regarding the test cases that have high wind output in Wyoming, high thermal output in Wyoming, and high exports out of the NTTG region, all occurring simultaneously. The intent of the Joint Parties' PPC request is to test a sensitivity where thermal generation in Wyoming is reduced at times of high export out of the NTTG region."

NWEC observes that the proposed approach does not require full retirement of thermal units (which may or may not occur by the end of the 10-year planning horizon), but rather for downward dispatch. Given the availability of zero fuel cost resources such as wind, this makes sense in the context of security constrained economic dispatch.

We also note that circumstances relating to NTTG member PacifiCorp continue to evolve. The 2017 IRP Update filed on May 1, 2018 incorporates several substantial changes, including:

- A reduction of 424 MW of coincident system peak demand by 2027, about a 4% reduction compared to the 2017 IRP. Likewise, forecasted annual load is projected to decrease from just under 66,000 GWh to about 63,000 GWh in 2027.
- "With reduced loads and lower renewable resource costs, the updated preferred portfolio contains no new natural gas resources through the 20-year planning horizon. This is the first time an IRP has not included new fossil-fueled generation as a least-cost, least-risk resource for PacifiCorp."
- "Through the end of 2036, the updated preferred portfolio includes over 2,700 MW of new wind resources, 1,860 MW of new solar resources, 1,877 MW of incremental energy efficiency resources, and approximately 268 MW of direct-load control resources."

We anticipate these and other changes (as may be relevant for the 10-year NTTG planning time horizon) may be included by PacifiCorp for a Q5 loads and resources data update to NTTG that should also be considered in the 2018-19 NTTG Transmission Plan and the sensitivity study request proposed by the Joint Parties.

As the situation rapidly evolves not only for PacifiCorp but all NTTG members, NWEC believes the information developed by the proposed study request could be very beneficial for NTTG members and stakeholders, regulatory bodies throughout the region, and the region's residents and electric customers as a whole.

Thank you for considering NWEC's views on this matter.