



## NTTG 2018-2019 Draft Study Plan Stakeholder Comment Form

Open Comment period May 10<sup>th</sup>, 2018 through May 25<sup>th</sup>, 2018

Please submit comments to [info@nttg.biz](mailto:info@nttg.biz)

### Commenter Contact Information

Date May 25, 2018
Name Justin Bieber
Organization Utah Association of Energy Users

### Stakeholder Comments

Study Plan Section	Page/Line #	Comment
0	0	UAE appreciates NTTG's work developing this study plan and offers the following comments on version 2e of the NTTG 2018-2019 Biennial Study Plan.
IV	93-105	Table 3 appears to suggest that Bridger 1 will be modeled as retired. However, per the discussion, it appears that it will be assumed to not be retired, except in the sensitivity case. Please add a note or indication within the the table that clarifies that Bridger 1 will not be modeled as retired, except in the sensitivity case.
IV	93-105	Table 3 is labeled "Planned Coal Retirements prior to next Planning Cycle 2030-2031." Naughton 1 and 2 are also planned to be retired prior to 2030-2031. To be accurate, these units should be included in Table 3. UAE suggests to include these units with a similar clarifying note that makes it clear that although these units are planned to be retired prior to next planning cycle, they are not modeled as retired in the biennial plan or the sensitivity described with respect to Bridger 1. UAE recognizes that a further sensitivity regarding the Naughton units will be performed through the PPC study.
IV	115	Table 4 - New Transmission projects - for projects that are jointly sponsored, please include the percentage being funded/sponsored by each entity.
IV	128	Table 6 - Transmission Path Capacity and ATC - it would be helpful to have additional columns that indicate the path ratings and ATC in the planning year of 2028, as well a list of the transmission projects that are assumed to be in-service.
IV	177-178	The study plan states that the power flow seed cases will be adjusted to meet the desired case objectives to form the base cases for further technical analysis. For transparency, UAE requests that all changes to the seed cases be clearly documented in the plan. The specific loads and resources that are changed should be identified and the



		magnitude of the change quantified. The justification for each adjustment and the desired case objectives that drive each of these adjustments should also be identified. The power flow models in PowerWorld, including the final case and original export from GridView prior to any adjustments, should be made available to interested stakeholders that execute the appropriate NDA, or other agreements.
IV	73-92	Q1 Load and Resource Submittals. Please include as an appendix to the study plan the details of the loads and resource submissions as submitted in the data submittal forms (prior to 3/31/2018 deadline). In the spirit of transparency, at a minimum, this should include the specific resource generating unit locations and capacities, both existing and planned. UAE recognizes that NTTG does not question the submissions of its members, so it is critical that stakeholders be able to review this data for transparency.
IV	331-347	Consistent with our comments above, for transparency, all changes to the seed cases should be clearly documented in the plan. The specific loads and resources that are changed should be identified and the magnitude of the change quantified. The justification for each adjustment and the desired case objectives that drive each of these adjustments should also be identified. The adjusted power flow models in PowerWorld, including the final case and original export from GridView prior to any adjustments, should be made available to interested stakeholders that execute the appropriate NDA, or other agreements.
IV	350-360	UAE appreciates the comment that "significant changes to the exported seed case data will be tracked and documented." However, the qualification that only "significant" changes will be tracked and documented could lead to some disagreement over what changes are significant. For transparency, if NTTG provides the power flow models in PowerWorld, including the final case and original export from GridView prior to any adjustments, to interested stakeholders that execute the appropriate NDA, or other agreements, that will help avoid disagreements over which changes are significant.
IV	355-358	The study plan suggests that coincident load conditions can/may be adjusted from 1 in 2 conditions to 1 in 5 conditions for each transmission provider. UAE is concerned that this can lead to an overly conservative conditions in the power flow model since it is highly unlikely that each balancing area would see an coincident peak at the same time. To the extent that CP adjustment are made, the diversity between the balancing areas, i.e. the fact that not all CPs will occur simultaneously, should be taken into account. Further, UAE does not expect that these CP load adjustments will be relevant for each of the stress conditions studied.
IV	331-347	The study plan does not commit to the utilization of the scenarios listed in this section. UAE requests that NTTG allow for stakeholder comment and feedback on the scenarios that are selected to be used for the actual transmission plan. The study plan should document the process by which these stress conditions will be selected and stakeholder input will be considered.



IV	440-470	Table 10 - Illustrative Change Case Selection. The change case matrix that will be developed in this biennial is an extremely important input into the planning process. UAE understands that the TWG utilizes its professional judgment to develop the final change case matrix. Please also include in this section the details regarding stakeholder opportunity to provide input regarding the development of this matrix. In particular, it will also be important to robustly test the different sub-segments of the Gateway West project in the change case matrix.
VI and Attachment 6	627-645 & 930-944	The study plan refers the "Sensitivity Case" as a case that will provide information on the 2029 coal retirements, outlined in Table 3. Per UAE's comments above, the retirements currently shown in Table 3 only go out to the end of 2028. The Naughton Units 1 & 2 are currently planned to retire in 2029. Please provide clarification about which retirements are assumed in the 2029 coal retirement sensitivity case. It is UAE's understanding that NTTG plans to included the Jim Bridger 1 retirement, planned for the end of 2028, in this sensitivity scenario. If Naughton 1 & 2 are not assumed retired, then it really should be referred to as a 2028 coal retirement sensitivity case.
IX and Attachment 4	762 & 814	UAE acknowledges this placeholder for the Public Policy Consideration (PPC) request that was jointly requested and approved with modifications. UAE supports the inclusion of the PPC request and will provide comments regarding the request separately.