



NTTG 2016-2017 Draft Study Plan Stakeholder Comment Form

Open Comment period May 12th, 2016 through May 27th, 2016

Please submit comments to info@nttg.biz

Commenter Contact Information

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| Date May 27, 2016 |
| Name Henry Tilghman |
| Organization On behalf of Oregon Wave Energy Trust |

Stakeholder Comments

| Study Plan Section | Page/Line # | Comment |
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| 4 | 11/267 | <p>Attachment 1 does not list the public policy requirement set forth in ORS 7575.811 (HB 2187 (2015)). Under the terms of that statute, any regional transmission planning process which includes the State of Oregon must consider the transmission of electricity derived from ocean based renewable energy generation. Ocean energy resources include both off shore wind and marine hydro-kinetic generation resources. Because consideration of offshore wind and marine hydro-kinetic resources is now a public policy requirement of the state of Oregon, ocean energy should be addressed in the NTTG Biennial Study Plan for the 2016-17 Regional Planning Cycle.</p> <p>HB 2187 has multiple purposes. The primary, and most obvious, was to ensure that long term transmission planning processes would include ocean energy resources among the generation resources being considered to meet Oregon's renewable portfolio standard. As Oregon increases its RPS requirements, Oregon's policy makers sought to ensure that non-traditional ocean energy resources would be considered on an equal basis with land based renewable generation resources from other parts of the West. While there is no specific set aside for ocean energy generation within Oregon's RPS requirements, NTTG must consider ocean energy on an equal basis with on shore generation resources.</p> <p>An important secondary purpose of HB 2187 was to develop institutional experience in evaluating ocean energy resources within the transmission planning community in the Northwest. Oregon policy makers sought to ensure that transmission planning engineers and other experts would expand their expertise to include greater familiarity with the data sources and modeling tools specific to ocean</p> |

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| | | <p>energy resources. NREL has existing data sets specific to ocean energy resources. Oregon policy makers anticipate the institutional experience gained in evaluating ocean energy resources within the regional planning process will inform future Integrated Resource Planning and other generation expansion processes.</p> <p>Simply dismissing ocean energy generation resources as too expensive compared to onshore resources will not satisfy HB 2187; NTTG must actually incorporate ocean energy resources into its models. To the extent that existing data sets and modeling tools may prove inadequate to allow NTTG to consider ocean energy, those limitations should be fully documented in an appendix to the Plan.</p> |
| VI | 22/548 | NTTG should add an allocation scenario specific to ocean energy resources. OWET suggests adding an allocation scenario which would replace 1000 MW of onshore wind and solar with 1000 MW of a mix of offshore wind and marine hydrokinetic energy |
| IX | 26/699 | Even though NTTG is required by state law to consider ocean energy resources in developing its plan, NTTG could also consider adding a scenario or sensitivity case to consider ocean energy resources as part of its evaluation of Public Policy Considerations |