

Summary of Questions, Comments, and Responses on the WestConnect Enrolled Transmission Owners' Proposed Compliance Process Under FERC Order No. 1920

May 14, 2025

This document provides responses to oral and written questions and comments submitted by Relevant State Entities and Stakeholders¹ by April 16, 2025, regarding the WestConnect Enrolled Transmission Owners' ("ETOs") draft Order No. 1920 compliance process.

Number	Question/Comment	Response
<i>Process</i>		
1.	Whether comments on the proposed compliance process and tariff will be publicly posted?	The WestConnect ETOs are publicly posting a summary of comments and questions received (including in the RSE forums and stakeholder meetings), not the full text of all written comments.
2.	When will a more complete and detailed proposal be made available?	The WestConnect ETOs anticipate publicly posting the full draft tariff language for Order No. 1920 during Q3 of 2025.
<i>Proposed Timeline</i>		
3.	Shorten the proposed compliance timeline from five years to four years and align the cycle timing with Northern Grid, CAISO, and/or SPP RTO West.	The WestConnect ETOs have carefully considered utilizing a four-year compliance timeline as part of their interregional coordination efforts with CAISO and Northern Grid. The ETOs have concluded that completing the process within four years would jeopardize the integrity and accuracy of the results; and Order No. 1920 permits the WestConnect ETOs to conduct the study every five years.
4.	Do the WestConnect ETOs expect that there will be sufficient time in Q5-Q8 to both scope the scenarios and conduct the study for the hardest scenario?	Yes. The scoping may need to occur while the study work begins.
<i>Scenarios / Scoping</i>		
5.	Provide greater details on how scenario development will work, including stakeholder and Relevant State Entity input. For example, how will scenarios be determined? How will the seven factors identified in Order 1920 be accounted for? Which stakeholder will be able to contribute to the development of scenarios?	These details will be apparent in the draft tariff language.

¹ Stakeholders the provided written comments included (1) RMI, (2) Western Resource Advocates, (3) Interwest, and (4) National Audubon Society.

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6.	Utilize the same base datasets for all three scenarios.	The WestConnect ETOs plan to use the same base dataset for all three scenarios, which will be developed from Q1 through Q4. Additional scenario-specific data will be collected as needed prior to each scenario to supplement the base dataset.
7.	Conduct scenarios in parallel, not sequentially.	The three scenarios are completed sequentially to allow the WestConnect ETOs to incorporate lessons learned from each scenario, helping to inform and improve outcomes in subsequent scenarios.
Cost Allocation		
8.	Which scenario(s) will the Benefit/Cost test be based on? For example, will there be a reference scenario that will be used to base Benefit/Cost test on?	The calculation of the benefit-to-cost ratio and the allocation of costs to beneficiaries will be based on the case developed during Year 1 prior to the application of the scenarios and sensitivities.
9.	Regarding cost allocation, what are the principles underlying the choice of the 1.25 benefit/cost threshold.	A benefit-to-cost ratio of 1.25-to-1 is explicitly permitted by Order 1920 ² , consistent with the Order 1000 threshold for WestConnect, and also provides greater assurance that the benefits will exceed the costs. The concern is that the models that determine the benefits rely on forecasted inputs based on a variety of assumptions over a 20-year period. In addition, there is a degree of uncertainty around cost estimates relative to what the projects will actually cost. This uncertainty on benefits and costs is higher for long-term transmission projects developed using assumptions over a 20-year future period. Using a lower benefit-to-cost ratio, such as 1.0-to-1, introduces greater risk that the project will ultimately not be beneficial due to any changes in actual benefits or costs versus estimates/forecasts used in the B/C analysis. Even limited increases to costs or minor reductions in benefits would create a project that costs more than the value of the benefits it provides.

² Order No. 1920 at P 958.

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10.	How does the cost allocation methodology under the Order 1920 proposal differs from the methodology under Order 1000?	WestConnect's Order No. 1000 cost allocation methodology allocates costs based on the type of needs solved by the transmission project. In contrast, Order No. 1920 does not permit Transmission Providers to assess projects based on these individual benefit categories. ³ Instead, Transmission Providers must apply the standardized set of benefits defined in Order No. 1920 to all projects, which the ETOs intend to do. ⁴
11.	For project eligibility requirements, why does a project need to be (1) greater than 200kV and a minimum of 50 miles in length and (2) projects that physically interconnect the systems of two or more ETOs to be selected for allocation? This unintentionally may exclude smaller but beneficial projects.	The Commission has previously approved similar voltage- and mileage-based criteria. The long distances between load centers in the WestConnect region support the use of a 50-mile threshold. The 200 kV minimum voltage criterion targets transmission projects that are more likely to provide regional benefits, while excluding projects that are more local in nature. The physical interconnection requirement is intended to account for the unique characteristics of the WestConnect region. It excludes projects located solely within a single ETO's system from cost allocation, as those projects are accounted for in local planning processes. These criteria help to better identify regional projects with potential regional benefits, thereby increasing the likelihood of broader regional participation.
Right-Sizing		
12.	Recommend expanding the timeline for considering right-sizing to 20 years, in alignment with the study's planning horizon because limiting consideration of projects within a 10-year window risks missing key long-term upgrade opportunities.	The WestConnect's ETO's proposed 10-year right-sizing horizon is prescribed by Order No. 1920. Order No. 1920 specifically provides for Transmission Providers to consider right-sizing projects on a 10-year horizon. ⁵

³ Order No. 1920 at PP 1474, 1508.

⁴ Order No. 1920 at 1469.

⁵ Order 1920 at P 1683 ("As noted above, for purposes of implementing the right-sizing requirements that we adopt in this final order, transmission providers must propose on compliance a threshold that does not exceed 200 kV that is used in identifying the transmission facilities that an individual transmission provider anticipates replacing in-kind with a new transmission facility during the next 10 years, which it must then include in its in-kind replacement estimates. In other words, each transmission provider in the transmission planning region must include in its in-kind replacement estimates the transmission facilities operating at and above 200 kV, or at and above a lower proposed threshold, that it owns and anticipates replacing in-kind with a new transmission facility during the next 10 years.").

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13.	Allow all projects—not just those identified by a transmission owner planning in-kind replacement—to be considered for right-sizing to ensure that broader regional needs (reliability, economic, public policy) are incorporated and avoid over-reliance on greenfield solutions.	The WestConnect ETO’s proposal to only allow in-kind replacement projects to be considered for right-sizing is prescribed by Order No. 1920. Order No. 1920 defines “Right-Sizing” to include “in-kind replacement” projects. ⁶
<i>Project Selection</i>		
14.	Provide more details on how projects will be selected. For example, how will the three scenarios inform project selection? How will benefits be translated into identified needs? How will projects be selected during solicitation?	More detail on these points will be provided in the draft tariff language.
<i>Project Reevaluation</i>		
15.	Regarding FERC’s required reevaluation criteria #3, ⁷ when a project has been selected in consecutive plans and the in-service date shifts into the first half of the 20-year planning horizon, that this re-evaluation criteria would no longer apply.	The tariff language will implement the requirements of Order 1920 on this reevaluation issue.
16.	Provide examples of law changes that could trigger Reevaluation Criteria #3.	At this time, the WestConnect do not have specific examples of law or regulation changes that would trigger a reevaluation under this FERC requirement. FERC did not provide specific examples of law or regulation changes that would trigger reevaluation but gave transmission providers discretion to decide when such changes raise reasonable concern. Example laws that may trigger reevaluation criteria # 3 include, but are not limited to, (1) a tribal law that prohibits a transmission corridor in a specific location, or (2) laws imposing renewable portfolio standards.

⁶ Order 1920 at P 1678 (“We adopt the NOPR proposal to define right-sizing as the process of modifying a transmission providers in-kind replacement of an existing transmission facility to increase that facility’s transfer capacity.”).

⁷ Criteria #3 requires reevaluation when there are “significant changes in federal, federally-recognized Tribal, state, or local laws or regulations cause reasonable concern that a previously selected Long-Term Regional Transmission Facility may no longer meet the transmission providers’ selection criteria.” (Order No. 1920, P 1049).

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<i>Interconnection-Related Needs</i>		
17.	How does the ETO's implementation of FERC Order No. 2023 relate to FERC's Order No. 1920 5-year lookback requirement?	The WestConnect look-back for interconnection-related needs will review needs identified in Order No. 2023-compliant interconnection cluster study processes that meet Order No. 1920's criteria for interconnection-related needs. To the extent a transmission provider's Order No. 2023 effective date occurred less than five years earlier than the relevant point in time in the long-term transmission planning process, only needs identified in Order No. 2023-compliant studies will be considered.
<i>Interregional Coordination</i>		
18.	Include coordination of inputs, assumption, scenarios, and benefit quantification methodologies with Northern Grid, CAISO, and/or SPP RTO West during the data collection stage.	As part of compliance with the Order 1920 interregional planning directives, the WestConnect ETOs will implement the relevant data exchange.
<i>Other</i>		
19.	How will Order No. 1000 and Order No. 1920 planning processes interact?	Order Nos. 1000 and 1920 planning processes will inform each other but will not be dependent on each other. For example, if a project is selected in Order No. 1000 planning process, that project could be accounted for in the base case for long-term planning.
<i>Relevant State Entity Forums and Stakeholder Outreach Meetings</i>		
20.	In future RSE forums, can the WestConnect ETOs provide tariff language in advance of forums and focus the forum on a specific sub-topic?	In future Relevant State Entity - State Engagement forums, the WestConnect ETOs will aim to provide draft tariff language in advance, with each forum focused on specific sub-topics.
21.	Combine Relevant State Entity forum calls and Stakeholder Outreach calls into a single session, with clearly designated Q&A periods for each group. Currently, the separate meetings have been repetitive and limit cross-group dialogue.	Per the updated Stakeholder Outreach Process Announcement published on westconnect.com and circulated to the WestConnect Order No. 1920 stakeholder distribution list on April 16, 2025, the WestConnect ETOs anticipate holding one additional meeting during Q4 of 2025 where stakeholders may provide comments or questions directly to the ETOs. The WestConnect ETOs anticipate this forum being a joint meeting with the Relevant State Entities.

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		The RSE forum process permits stakeholders to ask questions and provide comments, including on WestConnect's proposal, to the Relevant State Entities at the end of each forum, ensuring an opportunity for cross-group dialogue. This was added in response to prior stakeholder requests.
22.	Provide Relevant State Entities more detailed content and focused discussion during the breakout room on specific elements of the ETOs' cost allocation proposal.	In future Relevant State Entity - State Engagement forums, the WestConnect ETOs will aim to provide draft tariff language in advance, with each forum focused on specific sub-topics.
23.	Request that ETO employees directly participate in Relevant State Forums during the "negotiation forum" breakout sessions and throughout the Questions and Answer periods.	<p><i>Forum for Negotiation:</i> The breakout room negotiation sessions are intended to be negotiation between the RSEs themselves, not between the RSEs and ETOs, for the purpose of developing a Long-Term Regional Transmission Cost Allocation Method(s) and/or State Agreement Approach.⁸ Under Order No. 1920, ETOs are to provide a "forum for negotiation" among the RSEs.⁹ Additionally, the ETOs seek to limit involvement in the breakout session negotiations to avoid the perception that the ETOs are pressuring the RSEs toward any particular outcome.</p> <p><i>Question and Answers Periods:</i> Due to the ETOs being comprised of twelve utilities, no single utility employee can represent the collective position of the ETOs without prior input and vetting from all utilities. The ETOs meet and address RSE and stakeholder feedback offline so as to present consensus responses at the next meeting. Individual RSEs are encouraged to reach out to the ETOs subject to their jurisdiction if it would be helpful to have one-on-one conversations with specific utilities.</p>

⁸ Order No. 1920-A at P 641.

⁹ Order No. 1920-A at P 638.