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

November 26, 2025

This document provides responses to written comments and feedback submitted by ten stakeholder organizations on Sept. 30, 2025, regarding the WestConnect Enrolled Transmission Owners ("ETOs") draft Order No. 1920 compliance process. Highlighted language is the specific text associated with the particular stakeholder's comments.

Number	Referenced Tariff Language	Question/Comment	Response
Identification of Benefits and Beneficiaries (Section IX.A)			
1.	For each Long-Term Regional Transmission Facility that is proposed to address the Long-Term Regional Transmission Needs identified by the Transmission Provider in response to the Long-Term Regional Transmission Facility solicitation conducted pursuant to [[Section IX.]], the Transmission Provider will identify the benefits and beneficiaries of that proposed Long-Term Regional Transmission Facility to aid in the determination of whether to identify a proposed Long-Term Regional Transmission Facility as eligible for cost allocation under this [[Section IX]].	Certain stakeholders provide that it is currently unclear how the "Long-Term Regional Transmission Need" is determined. Could you clarify the expected outcomes of the LTRT Facility solicitation? Will WestConnect conduct an initial needs analysis based on economic and reliability studies across various scenarios to identify needs for this cycle?	The WestConnect ETOs will first perform scenario studies to evaluate reasonable expectations of how the future of the region will look over a 20-year horizon, and then allow those studies to inform whether there is a need for Long-Term Regional Transmission Facilities in that 20-year horizon. The tariff establishes that scenarios are to be studied and how benefits are to be identified. There is no separate criteria for needs identification in the long-term planning process FERC created in Order No. 1920.
2.	The following benefits will be determined for each project proposed as a Long-Term Regional Transmission Facility that would address an identified Long-Term Regional Transmission Need.	Certain stakeholders recommend that WestConnect consider a portfolio of needs (and projects) together, while ensuring each project is sufficiently beneficial. Certain stakeholders note that this may also help with cost allocation by spreading benefits across the region more broadly.	The WestConnect ETOs do not anticipate utilizing a portfolio approach as (a) it may not tie the costs of particular projects to benefits for those projects and (b) it could allow low-benefit projects to be part of a portfolio even if those individual projects provide so few benefits that they would not prevail on their own merits.

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3.	The following benefits will be determined for each project proposed as a Long-Term Regional Transmission Facility that would address an identified Long-Term Regional Transmission Need.	Certain stakeholders recommend adding a reference to scenarios and how they will be used to reduce expected costs and expected risks (e.g., use scenario-based, least-regrets planning).	Forthcoming tariff language will provide more detail on the role of scenarios in long-term regional project selection.
4.	The Quantified Benefits will be calculated over the 20-year period following the projected in-service date.	Certain stakeholders recommend extending the 20-year period to 40-plus years.	A 20-year evaluation period complies with FERC Order No. 1920, and represents a horizon that already presents a set of challenging tasks. Extending the horizon to 40 years would increase uncertainty due to the challenges in predicting long-term variables and market conditions.
5.	In determining the Quantified Benefits for a proposed Long-Term Regional Transmission Facility, the Transmission Provider may not double-count any benefits.	Certain stakeholders recommend adding a provision here ensuring that the Transmission Provider (TP) "may include any other benefits that can reasonably be demonstrated and quantified but are not included in the criteria above. Benefits not quantified, if any, should be documented and described qualitatively (for possible consideration in voluntary cost allocation agreements)."	The WestConnect ETOs are using a comprehensive set of benefits, and the draft tariff language is consistent with FERC Order No. 1920. A "catch-all" benefit could create the risk of inconsistency in project evaluation and the potential for unfair impacts on prospective ratepayers.

Number	Referenced Tariff Language	Question/Comment	Response
		Reduced Loss of Load Probability or Reduced Planning Reserve Margin (Section IX.A.2)	
6.	Quantified Benefits would only be identified to the extent that: The proposed Long-Term Regional Transmission Facility would allow for different generation resources to be reached, with those resources eliminating or reducing the need of the Transmission Provider to build new generating facilities or expand existing generating facilities to satisfy planning reserve margins for the Transmission Providers.	Certain stakeholders provide that by limiting this to specific resources, it will ignore load and resource diversity. As written, it suggests a misunderstanding of what results in the lower planning reserve margins. Accessing additional resources to meet PRMs only reduces the need for new generation if there is an excess of generation already in operation somewhere. This can happen if one area is persistently long on winter capacity (such as the Desert SW) and another region is short. But, transmission also reduces the amount of capacity that is needed due to load diversity, so it is necessary to include something along the lines of the transmission facilities allowing planners to take advantage of load and resource diversity across a wider region to reduce PRM and generation investment costs.	This language does not prohibit any resource types. Additionally, other portions of the draft Tariff already capture the events discussed. For example, the Extreme Weather Events benefit captures the possibility of different extreme temperatures and the Reduced Loss of Load Probability or Reduced Planning Reserve Margin benefits (among others) address reduced capital costs through access to generation.
7.	Quantified Benefits would only be identified to the extent that: The proposed Long-Term Regional Transmission Facility would reduce instances in which the Transmission Provider would curtail load either as a result of insufficient generation or as a result of transmission congestion.	Certain stakeholders note that it is important not to ignore the benefit of avoiding very high costs even before load needs to be shed.	The separate Production Cost Savings benefit addresses this concern by considering production-cost savings.

Number	Referenced Tariff Language	Question/Comment	Response
		Production Cost Savings (Section IX.A.3)	
8.	The Transmission Provider will calculate the savings in fuel and other generation operating costs that would be realized if the new Long-Term Regional Transmission Facility enables the increased dispatch of lower production-cost generation over higher production-cost generation.	Certain stakeholders recommend that differences in generation investment costs should be considered.	The WestConnect ETOs address generation investment (e.g., capital costs) in other benefits including the Reduced Loss of Load Probability or Reduced Planning Reserve Margin benefit.
9.	The Transmission Provider will calculate the savings in fuel and other generation operating costs that would be realized if the new Long-Term Regional Transmission Facility enables the increased dispatch of lower production-cost generation over higher production-cost generation and, where applicable, reduces market clearing prices as lower-cost generation suppliers increasingly set market-clearing prices.	Certain stakeholders provide that reduced market prices are only a benefit for imports. It is equally important to consider higher market prices and their value for exports (including, for example, avoiding zero or negative prices due to surplus solar).	Higher market prices and their value for exports outside of the WestConnect region are outside the scope of the benefits required to be quantified in FERC Order No. 1920.

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10.	The production-cost model studies used to quantify these benefits to the Transmission Provider must demonstrate “tangible” benefits to the Transmission Provider.	Certain stakeholders comment that many use “adjusted production cost” instead of “production-cost model studies” to estimate how these benefits are allocated to individual parties, but adjusted production cost misses much of the trading value of imports and exports, so the sum of APC across all parties understates total production-cost benefits provided by a transmission project. The current language does not prevent doing it correctly, but it also does not guarantee it.	The Tariff is appropriately focused on tangible benefits that flow to the individual WestConnect ETOs.
11.	The production-cost model studies used to quantify these benefits to the Transmission Provider must demonstrate “tangible” benefits to the Transmission Provider by demonstrating that by alleviating congestion, the lower-cost resources that were previously limited by the identified congestion and that are needed by the Transmission Provider would become accessible to the Transmission Provider through firm transmission service rights.	Certain stakeholders note that fuel cost savings from efficient dispatch occur even without firm transmission service to the lower-cost resource(s).	Resource access through the construction of FERC Order No. 1920 projects is the method by which production-cost savings would be achieved. As a result, it is appropriate to expect that the FERC Order No. 1920 projects provide firm transmission service that would enable the WestConnect ETOs to access the lower-cost resources.

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12.	The availability of any such lower-cost resources and the need for any such resources are factors that will be considered as part of the evaluation of whether these benefits would arise. For example, planning models must reflect existing and planned resource assumptions and cannot disregard or supplant those assumptions when identifying congestion solutions.	Certain stakeholders request more detail to understand if this is appropriate. For example, clarify that the models will reflect existing, planned, and projected new resources identified through the scenario development process. In addition, the production-cost models should account for real-world, regularly occurring market conditions that will accurately reflect the value of existing and new transmission, including generation and transmission outages, heat waves and cold snaps, and renewable energy droughts.	The base case and scenario cases would include the existing, planned, and projected generation in the region.
13.	The quantification of these production-cost savings must ensure that the proposed Long-Term Regional Transmission Facility enables access to generation resources that differ from the existing and planned generation resources selected through the resource planning activities of the Transmission Provider.	Certain stakeholders note that the benefit of creating access to locations with lower cost generation will mostly show up as reduced investment (capital) cost, which is not associated with fuel cost savings.	The WestConnect ETOs account for capital costs in other benefits, including the Reduced Loss of Load Probability or Reduced Planning Reserve Margin benefit. As a result, those savings will be captured.
14.	Production-cost savings will only be identified where: (a) modeling shows persistent congestion (prolonged congestion that is independent of isolated events or outages).	Certain stakeholders provide that many production-cost benefits may come from nonpersistent congestion and isolated events or outages (such as during wildfires, heat waves, or winter storms) may account for a considerable portion of transmission benefits. IX.A.5 as written is unlikely to be sufficient to capture the full range because not all challenging events may be considered there.	The WestConnect ETOs account for wildlife, heatwaves, and winter storms in the Extreme Weather Events benefit, and maintain that the benefit provides for the consideration of a wide spectrum of events.

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15.	Production-cost savings will only be identified where: . . . (d) transmission service is available (or would become available using the Long-Term Regional Transmission Facility) between the location of the existing and plannedgeneration resources and the location of the loads of the Transmission Provider to beserved by those generation resources as identified in the production-cost modeling.	Certain stakeholders provide that this criterion is overly restrictive because transmission service to a specific lower-cost dispatch generator is not necessary under efficient dispatch such as that enabled by a market like EDAM or Markets+.	The WestConnect ETOs do not agree that there is a conflict between this language and those market structures such that the ETOs would be unable to apply this criterion in those market structures. If market developments arise such that production-cost savings would not be identified under these conditions, the WestConnect ETOs will consider revisions accordingly.
16.	Production-cost savings will only be identified where: . . . (g) all fuel contractobligations continue to be met, such as take-or-pay fuel supply contracts.	Certain stakeholders provide that this is a potential problem because Transmission is built for ~50 years but fuel contracts rarely last that long, and can be renegotiated.	The WestConnect ETOs' inclusion of consideration of savings in fuel is mandated by Order No. 1920.[1] Contractual obligations cannot be ignored when considering what fuel savings can be achieved.
Reduced Congestion Due to Transmission Outages (Section IX.A.4)			
17.	Reduced congestion due to transmission outages. The Transmission Provider will calculate the reduction in production costs to the Transmission Provider from avoided congestion resulting from the adjustment required following a single contingency transmission outage as a result of a proposed Long-Term Regional Transmission Facility.	Certain stakeholders provide that it needs to be clear that this is not subject to the "isolated events" restriction in the "persistent congestion" clause in Section IX.A.3.	The WestConnect ETOs confirm that the persistent congestion under the Production Cost Savings benefit and the reduced congestion under the Reduced Congestion Due to Transmission Outages benefit are separate, and the draft Tariff provides for different processes for their calculation.

[1] Order No. 1920, P 767.

Number	Referenced Tariff Language	Question/Comment	Response
		Cost Allocation Minimum Criteria (Section IX.B)	
18.	The Quantified Benefits of a Long-Term Regional Transmission Facility to each Transmission Provider enrolled in the WestConnect Planning Region must be at least 1.25 times the estimated costs of the Long-Term Regional Transmission Facility to that Transmission Provider, with such costs provided by either (a) the project sponsor, subject to adjustment by the Transmission Provider consistent with good utility practice, or (b) the Transmission Provider for unsponsored projects.	Certain stakeholders provide that this "must be at least...to that Transmission Provider" language is exceedingly conservative, especially if applied on a TP-by-TP basis (as written, it suggests that the Benefit/Cost ratio of 1.25 must be met for every relevant TP, as opposed to the threshold being met based on the ratio of total benefits to total costs, with costs then allocated "roughly commensurate" with benefits).	One or more WestConnect ETOs will not be made to subsidize costs that are associated with benefits going to other WestConnect ETOs. The benefit-to-cost ratio is to be applied to each ETO. Doing so is not only permitted by Order 1920[2], it is directly associated with the cost causation principle.
19.	Long-Term Regional Transmission Facility transmission lines must be 200 kV or greater and a minimum of 50 miles in length.	Certain stakeholders provide that there can be very valuable projects, such as adding a phase shifter, that would not be 50 miles. Why restrict based on miles if more than one transmission provider receives benefits?	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 voltage and length criteria encourage projects with potential regional benefits, thereby increasing the likelihood of meaningful projects with region-wide benefits. In addition, a phase shifter would be evaluated as part of a larger transmission project proposal as one of the types of advanced technology encouraged in a project solicitation, and not as a stand-alone transmission project by itself.

[2] Order No. 1920 at P 958.

Number	Referenced Tariff Language	Question/Comment	Response
	Voluntary Funding of a Long-Term Regional Transmission Facility That Does Not Satisfy Cost Allocation Criteria (Section IX.B.1)		
20.	If the only criteria in [[Section IX.B]] that is notsatisfied is the 1.25-to-1 benefit-to-cost ratio, the Transmission Provider will specify the level of voluntary funding that would be necessary so that the Quantified Benefits to the identified Transmission Provider, when compared to project costs, would satisfy the 1.25-to-1 benefit-to-cost ratio for each identified beneficiary that is a Transmission Provider.	Certain stakeholders provide that this is useful but may not be an adequate safety valve for beneficial projects that are not shown as beneficial due to the restrictions on benefits quantification.	These stakeholder comments are more directed to the scope of the Commission's rule than to the WestConnect ETOs. The WestConnect ETOs are focused on complying with the rule.
21.	If the only criteria in [[Section IX.B]] that is not satisfied is the 1.25-to-1 benefit-to-cost ratio, one or more interconnection customers or Relevant State Entities shall have 60 days following the posting to voluntarily agree to fund a sufficient portion of the cost of the proposed Long-Term Regional Transmission Facility on a non-revocable basis so that the Quantified Benefits to the remaining costs would satisfy the 1.25-to-1 benefit-to-cost ratio.	Certain stakeholders note that 60 days is very short if the benefit quantification misses important benefits. RSEs will struggle to figure out what's missing and how valuable the missing pieces are.	The WestConnect ETOs proposed 60 days for voluntary funding was created after consulting with stakeholders. If the RSEs propose an alternative, the ETOs would consider it, recognizing the timeframe cannot be extended such that it materially interferes with the WestConnect ETOs' ability to complete the planning process timely.

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Selection of Transmission Facilities for Regional Cost Allocation as a Long-Term Regional Transmission Facility (Section IX.C)			
22.	In determining whether to select a proposed Long-Term Regional Transmission Facility that otherwise meets the criteria in [[Section IX.B]] for cost allocation, the Transmission Provider shall consider: . . . the probability that those Quantified Benefits will be realized and the portion of the Long-Term Regional Transmission Planning cycle during which those Quantified Benefits will be realized	Certain stakeholders note that this can cause problems because people may "discount" benefits if they feel they are uncertain, but benefits are cost savings and not building a transmission project may result in higher costs. Discounting benefits effectively means you do not care much about the probability of high-cost outcomes (especially if, as noted above, such outcomes are excluded from benefits quantification).	The tariff must recognize that the Transmission Providers are obligated by law to make transmission planning decisions that are just and reasonable and that result in the incurrence of costs that can be properly imposed on their ratepayers. For example, it will matter to the decision-making process whether a project shows benefits at the far end of the 20-year horizon under study assumptions that are highly uncertain.
23.	In determining whether to select a proposed Long-Term Regional Transmission Facility that otherwise meets the criteria in [[Section IX.B]] for cost allocation, the Transmission Provider shall consider: . . . the extent to which the selection of a Long-Term Regional Transmission Facility would maximize Quantified Benefits accounting for costs over time without over-building transmission facilities	Certain stakeholders note that it is very important to keep track of any benefits not quantified. These are especially important for voluntary cost allocation agreements.	The WestConnect ETOs do not intend to keep track of any benefits that are not quantified under the tariff process.

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24.	In determining whether to select a proposed Long-Term Regional Transmission Facility that otherwise meets the criteria in [[Section IX.B]] for cost allocation, the Transmission Provider shall consider: . . . the ability of the project sponsor to acquire the necessary rights-of-way and other site control necessary to construct the proposed Long-Term Regional Transmission Facility in a cost-effective or efficient manner.	Certain stakeholders provide that most RTO processes first identify a need based on input from sponsors and other stakeholders, and then determine who is best to build it. This language implies a process that seems to lump those two steps together, which will likely cause significant challenges in getting through the process.	If a Certain stakeholder-proposed, unsponsored project is selected, the WestConnect region will solicit prospective developers and will consider the project sponsor's ability to secure necessary ROW and other land rights. If a developer-sponsored project is selected, the WestConnect region will simultaneously evaluate the project and the sponsor, and in doing so will consider the project sponsor's ability to secure necessary ROW and other land rights.
Cost Allocation Methodology (Section IX.D)			
25.	For any Long-Term Regional Transmission Facility selected by the Transmission Provider for Long-Term Regional Transmission Cost Allocation, the costs of the Long-Term RegionalTransmission Facility will be allocated proportionally to the Transmission Providers enrolled in the WestConnect Planning Region determined to be beneficiaries in the WestConnect Planning Region in accordance with this [[Section IX.D]]	Certain stakeholders note that this is stricter than astandard of allocating costs "at least roughly commensurate" with benefits, as required by FERC.	"Roughly commensurate" is part of the cost causation principle and the governing legal standards that must be satisfied. An allocation of costs done proportionally is for the purpose of having a tariff process that can satisfy the legal standards.
26.	The cost allocation for a Long-Term Regional Transmission Facility selected for Long-Term Regional Transmission Cost Allocation must satisfy the following principles:	Certain stakeholders provide that B/C ratios from multiple scenarios will best inform whether cost allocations are "roughly commensurate."	The WestConnect ETOs are developing tariff language to further address this matter.

Number	Referenced Tariff Language	Question/Comment	Response
	Cost assignments for the Long-Term Regional Transmission Facility must be roughly commensurate with Quantified Benefits from the Long-Term Regional Transmission Facility.		
27.	The costs of a Long-Term Regional Transmission Facility selected by the Transmission Provider for regional cost allocation will be allocated to the Transmission Provider in accordance with the Quantified Benefits of that project determined prior to the Long-Term Regional Transmission Facility's selection as a Long-Term Regional Transmission Facility for regional cost allocation in accordance with [[Section]] using the following formula	Certain stakeholders provide that it is not clear which scenario will be used to allocate costs, and different scenarios will have different B/C ratios, so a "roughly commensurate" approach that considers all scenarios should be considered.	The WestConnect ETOs are working on tariff language to address this matter.
28.	In no event will identified beneficiaries in the WestConnect Planning Region from whom Long-Term Regional Transmission Facility project costs are sought to be recovered under Section 205 be denied either transmission transfer capability or ownership rights proportionate to their allocated costs, as determined by FERC in such proceeding.	Certain stakeholders provide that in a region with three utilities (A, B, and C) everybody may benefit from adding a line between A and B. Particularly in a market setting (including EDAM and Markets+), it may not make sense to allocate rights to C even though C could be a major beneficiary. Perhaps C could waive getting rights, but it's also possible C would simply try to avoid cost allocations by not being able to take advantage of explicit transmission rights.	Transmission Providers in the WestConnect Planning region do not have the option to opt-out of cost allocation and therefore could not "avoid cost allocations." If a project is selected as a Long-Term Regional Transmission Facility and satisfies the tariff criteria for cost allocation, and Utility C is a major beneficiary of the project, it would receive a cost allocation in accordance with the benefits quantified under the tariff's cost allocation process.

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29.	If a project beneficiary receives transmission transfer capability on the Long-Term Regional Transmission Facility in exchange for transmission service payments, such project beneficiary may resell the transfer capability.	Certain stakeholders ask what would C do in the example above (#28)? Would C get quantified benefits and then sell rights in addition? This could lead to gaming.	ETOs who receive transmission capability on the new project would be expected to receive, in exchange for transmission service payments to the project owner/transmission provider, assignment rights like those available under FERC's pro forma OATT.
Impacts of a Long-Term Regional Transmission Facility on Neighboring Planning Regions (Section IX.K)			
30.	If the Transmission Provider finds that a regional Long-Term Regional Transmission Facility in the WestConnect Planning Region causes impacts on a neighboring transmission system in the Western Interconnection that requires mitigation (a) by the WECC Path Rating Process, (b) under FERC OATT requirements, (c) under NERC Reliability Standards requirements, and/or (d) under any negotiated arrangement between the interconnected entities, the Transmission Provider is to include the costs of any such mitigation measures into theregional Long-Term Regional Transmission Facility's total project costs for purposes of determining the project's eligibility for regional cost allocation under the procedures identified in [[Section IX.B of this Attachment E]]	Certain stakeholders provide that projects may also benefit other regions, and this should be identified for inclusion in the interregional coordination processes.	As part of the long-term regional planning process under FERC Order No. 1920, the WestConnect ETOs will not be quantifying benefits that may flow to entities outside of the WestConnect region. However, a project selected as a long-term regional transmission project for the WestConnect region may be evaluated under a separate Interregional Coordination and Cost Allocation Process. Tariff drafting on the interregional process will occur at a later date.