



# **WESTCONNECT REGIONAL PLANNING PROCESS BUSINESS PRACTICE MANUAL**

**VERSION 3.0**

**Approved by the WestConnect Planning Management Committee on December 17, 2025**

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*The WestConnect Business Practice Manual is a living document, and revisions to this document are expected. This version reflects the removal of the Coordinating Transmission Owner structure directed by the Federal Energy Regulatory Commission in its October 17, 2024 Order on the region's compliance with Order No. 1000.*

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# Acronyms and Abbreviations

2	Agreement	The Planning Participation Agreement
3	ATC	available transmission capability
4	B/C	benefit/cost
5	BPM	Business Practice Manual
6	CAS	Cost Allocation Subcommittee
7	CCPG	Colorado Coordinated Planning Group
8	CEII	Critical Energy Infrastructure Information
9	DG	Distributed Generation
10	DR	Demand Response
11	DSM	Demand Side Management
12	EE	Energy Efficiency
13	EIS	Environmental Impact Statement
14	ETO	Enrolled Transmission Owner
15	FERC	Federal Energy Regulatory Commission
16	IR	Interregional
17	IRP	Integrated Resource Plan
18	ITC	independent transmission company
19	ITP	Interregional Transmission Project
20	kV	kilovolt
21	MVA	megavolt ampere
22	NDA	Non-Disclosure Agreement
23	NERC	North American Electric Reliability Corporation
24	NTA	Non-transmission Alternative
25	OASIS	Open Access Same-Time Information System
26	OATT	open access transmission tariff
27	PCC	Planning Coordination Committee
28	PMC	Planning Management Committee
29	PRR	Proposed Revision Request
30	PRT	PRR Review Team
31	PS	Planning Subcommittee
32	RPS	Renewable Portfolio Standards
33	RTO	Regional Transmission Organization
34	SPG	Subregional Planning Group
35	SSPG	Sierra Subregional Planning Group
36	SWAT	Southwest Area Transmission
37	TO	Transmission Owner
38	TPL	Transmission Planning
39	TPPL	Transmission Planning Project List
40	WECC	Western Electricity Coordinating Council

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# 1.0 Introduction

## 1.1 Purpose of this Business Practice Manual

The purpose of this Business Practice Manual (BPM) is to describe the WestConnect regional planning process developed for compliance with Federal Energy Regulatory Commission (FERC) [\*Order No. 1000, Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities\*](#), and its progeny (Order No. 1000).<sup>1</sup> Order No. 1000 is a Final Rule that reforms FERC's electric transmission planning and cost allocation requirements for public utility transmission providers. The order builds on *Order No. 890, Preventing Undue Discrimination and Preference in Transmission Service* (Order No. 890), and was designed to "correct remaining deficiencies with respect to transmission planning processes and cost allocation methods."<sup>2</sup> Regarding regional transmission planning, Order No. 1000 implementation includes the following components:

1. Requires that each public utility transmission provider participate in a regional transmission planning process that satisfies the principles outlined in Order 890 and produces a regional transmission plan.
2. Implementation of planning processes that explicitly provide for consideration of public policy requirements.
3. Developer qualification criteria must be developed and non-incumbent developers must have opportunities comparable to that of incumbent developers.
4. A regional cost allocation method for new regional transmission facilities that meets the cost allocation principles<sup>3</sup> in Order No. 1000 must be developed. Those principles are:
  - Allocated costs must be roughly commensurate with estimated benefits.
  - Costs cannot be involuntarily allocated to parties that do not benefit from the project(s).
  - A benefit-to-cost ratio of greater than 1.25 cannot be without justification and Commission approval.
  - Costs cannot be allocated outside a region unless agreed upon by the other region.
  - Allocation methods and identification of beneficiaries must be transparent.
  - Different allocation methods may be used for different types of projects.
5. Interregional Coordination by each pair of neighboring regions is required in order to determine if there are more efficient or cost-effective solutions to the transmission needs of the two regions. The regions are also required to develop information sharing processes and procedures to jointly evaluate projects proposed to be in both regions.
6. Amendment of the open access transmission tariff (OATT) of each public utility transmission provider to incorporate the processes and methods developed to comply with Order No. 1000.

<sup>1</sup> All references to Order No. 1000 include any subsequent orders.

<sup>2</sup> FERC. 2011. Fact Sheet: Order No. 1000 Final Rule on Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities.

<sup>3</sup> Order No. 1000 at P 612-693.

In this BPM, the term “WestConnect” refers to an association of transmission owners (TO) and other stakeholders in the WestConnect Planning Region performing the function of regional transmission planning for the Planning Region organized for compliance with Order No. 1000 through the WestConnect Planning Management Committee (PMC) established under the terms of the Jurisdictional TOs’ Open Access Transmission Tariff (OATT or Tariff) and the WestConnect Planning Participation Agreement (hereinafter referred to as the Agreement) <sup>4</sup>, which is a filed rate schedule of the Jurisdictional TOs’ Tariff. At times, this BPM incorporates the terms of the Agreement when referencing the Tariff.

The provisions of this BPM are intended to aid the implementation of the Tariff and the Agreement. If any provision of this BPM conflicts with any provision in the Tariff, the Tariff will govern.

This BPM is not meant to provide the criteria, standards, process, or timeline for each WestConnect TO’s local system planning process. Local system planning is described in each TO Member’s OATT and any associated separate business practices developed and applied by each TO Member<sup>5</sup>.

This BPM is intended to provide explanations, guidance, and further details of the provisions outlined in individual OATT Planning Attachments of the TO Members of the PMC. Any provision of the OATTs that is summarized or repeated in this BPM is intended to aid understanding. Even though every effort will be made by the PMC to update the information contained in this BPM and to notify stakeholders of changes, it is the responsibility of each stakeholder to ensure that he or she is using the most recent version of this BPM and to comply with all applicable provisions of the OATTs. A reference in this BPM to the OATTs, a given agreement, any other BPM or instrument is intended to refer to the OATTs, that agreement, BPM or instrument as modified, amended, supplemented, or restated.

The captions and headings in this BPM are intended solely to facilitate reference and not to have any bearing on the meaning of any of the terms and conditions of this BPM.

Provisions outlined in this BPM are based upon FERC-approved jurisdictional public utility TO Members’ OATT Attachment Ks.<sup>6</sup> The OATTs are the governing documents upon which the BPM is developed. If and as the OATTs change over time, the BPM, too, will have to change.

WestConnect will periodically revise this BPM to reflect changes in the planning processes described herein. Revisions will be processed pursuant to the BPM Change Process attached hereto as Appendix B. The effective date of any amendments and restatements, and/or any termination of this BPM requiring an OATT amendment, may be contingent on any necessary FERC and/or Board of Director approvals, as may be determined to be required by any or all of the WestConnect TO Members.

<sup>4</sup> The WestConnect PMC is independent of the other activities of WestConnect. WestConnect engages in other activities under other agreements separate and apart from the WestConnect Planning Participation Agreement. Such other activities include the efforts of the WestConnect Steering Committee [Member TOs](#) to work collaboratively to assess stakeholder and market needs, and develop cost-effective enhancements to the western wholesale electricity market, and are not within the scope of this BPM.

<sup>5</sup> WestConnect’s TO Members may include both public and non-public utilities. The term “TO Member” will be used to refer generally to any transmission entity enrolled in the region.

<sup>6</sup> FERC Order No. 890 required public utilities to file an Attachment K in compliance with its terms. In practice, the attachment designation differs among public utilities and might not be Attachment K in all cases. The current version of the jurisdictional public utility TOs’ OATTs can be accessed from the links in Appendix C.

## 2.0 WestConnect Region for Order No. 1000

The WestConnect Planning Region is defined as the combined footprints of signatories to the Agreement within the Enrolled Transmission Owners Member Sector (as defined in Section 3.1.1).<sup>7</sup> Any TO in the Western Interconnection that meets the ETO Member Sector definition under the Agreement is eligible to enroll in the WestConnect planning process by executing the Agreement evidencing its commitment to perform the function of regional transmission planning for the WestConnect region.<sup>8</sup>

## 3.0 Overview of WestConnect’s Regional Transmission Planning Process

### 3.1 WestConnect Planning Management Committee

The Agreement contains the details of the PMC organization and responsibilities. The PMC has overall responsibility for all WestConnect regional planning activities in compliance with Order No. 1000. Entities identified in the Agreement as members of the PMC are referred to in this BPM as “PMC Member(s).”

#### 3.1.1 Organization and Functionality

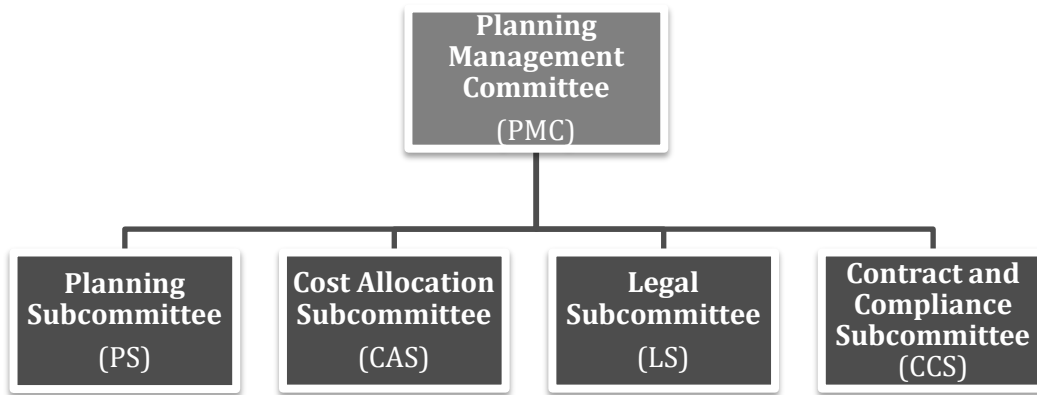
The PMC, after considering the data and comments supplied by members and stakeholders, will develop a Regional Transmission Plan (Regional Plan) that treats similarly situated customers (e.g., network, retail network, native load) comparably in transmission system planning. To accomplish that goal, the planning management function consists of a hierarchy of subcommittees with discrete functionality, membership, and voting rights. Figure 1 shows the subcommittees and relationships within the PMC structure.

<sup>7</sup> Certain TO Members may have transmission facilities located in a planning region other than the WestConnect Planning Region. If a transmission facility is located exclusively in a planning region other than WestConnect, it shall not be subject to regional transmission planning in WestConnect. Such facilities may be subject to interregional coordination.

<sup>8</sup> A current list of ETO Members is maintained on the WestConnect website and can be accessed [here](#). A map of the transmission facilities of the ETO Members is also maintained on the website and can be accessed [here](#).



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**Figure 1. Planning Management Committee Structure**

2 The Agreement includes the membership structure and voting procedures. The five PMC Member  
 3 Sectors are defined in Section 6 of the Agreement and include:

- 4 1. Enrolled Transmission Owners (ETOs or TOs)
- 5 2. Transmission Customers
- 6 3. Independent Transmission Developers or Owners
- 7 4. State Regulatory Commissions
- 8 5. Key Interest Groups

9 The Agreement covers governance procedures in Section 8, including voting by Member Sector  
 10 representatives, in Section 8.5.

### 11 **3.1.1.1 Planning Management Committee**

12 The primary function of the PMC is to manage the regional planning process, including approval of  
 13 the Regional Plan. The PMC is to coordinate and have the decision-making authority over whether to  
 14 accept recommendations from the Planning Subcommittee (PS), Cost Allocation Subcommittee  
 15 (CAS), and other subcommittees.<sup>9</sup> Pursuant to the Agreement, members signing the Agreement may  
 16 designate representatives to be members of the PMC, the PS, and CAS. The PMC, among other things,  
 17 is to develop and approve the Regional Plan after reviewing and considering the work product and  
 18 recommendations of the PS and the CAS. In addition, the PMC is to develop and approve a scope of  
 19 work, work plan, and periodic reporting for the WestConnect regional transmission planning  
 20 function, including holding a minimum of two informational stakeholder meetings per year. The  
 21 PMC is to appoint the chair of the PS, CAS, Legal Subcommittee, and Contract and Compliance  
 22 Subcommittee. The chair for each subcommittee must be a representative of the ETO Member  
 23 Sector.

24 The PS responsibilities include, but are not limited to, reviewing and making recommendations to  
 25 the PMC for development of study plans, establishing base cases, identifying regional transmission  
 26 needs, evaluating potential solutions to regional transmission needs, producing a Regional Plan for  
 27 PMC review and action, and coordinating with the CAS, as necessary, if a regional transmission

<sup>9</sup> The PMC may create and terminate other subcommittees as needed.

project is identified as a more efficient or cost effective solution to an identified regional transmission need and such project is seeking regional cost allocation.

The CAS responsibilities include, but are not limited to, performing and/or overseeing the performance of the cost allocation methodology. The CAS also is to review and make recommendations to the PMC for implementing definitions of benefits and cost allocation methodology as necessary. The CAS is to identify whether any regional transmission project seeking regional cost allocation is eligible for regional cost allocation under the governing standards in effect in the WestConnect region and report its conclusions to the PMC for purposes of PMC review and consideration.

The Agreement also creates a Legal Subcommittee (LS). The LS will be composed of two representatives appointed by each Member Sector, both of which must be attorneys. Responsibilities of the LS include, but are not limited to, reviewing and assessing the merits of formal or informal disputes arising under the Agreement. The LS will also provide recommendations to the PMC on legal strategy for litigation or resolving disputes.

The PMC created the Contract and Compliance Subcommittee (CCS) to support the PMC in the identification and performance of contractual and/or compliance-related tasks that arise as the PMC executes the regional planning process. The approved charter of the CCS is available on the WestConnect website [here](#). The CCS is a standing subcommittee and reports directly to the PMC.

### **3.1.1.2 Funding of WestConnect Planning Study Costs**

WestConnect, as part of the regional planning process, will perform a biennial evaluation to determine if there are any regional transmission needs. An identification of a regional transmission need triggers a submittal window for projects to satisfy the identified regional need(s). See Section 4.3. The evaluation performed for the purpose of identifying regional transmission needs will be funded by the PMC Members under the terms of the Agreement including the cost of the regional reliability assessment study(s), as defined in Section 4.3.2.1, and including the cost for economic modeling, as defined in Section 4.3.2.2.

Entities proposing a project to satisfy an identified regional transmission need(s) may make a project submittal under Section 4.4 which may be a transmission solution or non-transmission alternative. Funding for study work required to evaluate a project submittal is governed by Section 4.4.2.2 (for transmission alternatives) and Section 4.4.3.3 (for non-transmission alternatives), with the studies requiring a \$25,000 deposit from the project submitter, subject to true-up (up or down) based upon the actual cost of the study.

Also as part of the regional planning process, WestConnect may conduct studies for informational purposes that may not result in the identification and approval of a regional transmission need. Such studies may be part of a robust planning process and may be intended to help inform the PMC Members and improve their future decision making. These studies, if approved by the PMC, will be funded by the PMC Members under the terms of the Agreement.

## **3.2 Stakeholder Involvement**

### **3.2.1 Open and Transparent Process**

The WestConnect planning process will be performed in an open and transparent manner to attain objective analysis and comprehensive results. WestConnect invites and encourages interested

parties or entities to participate in and provide input to the regional transmission planning process at all planning process committee levels. All WestConnect planning meetings are open and transparent to all stakeholders except for closed sessions. The PMC will provide appropriate notice of all meetings, except meetings of the Legal Subcommittee as defined in the Agreement.

Stakeholders' opportunities for timely input and meaningful participation are available throughout the WestConnect planning process including, but not limited to, providing input to development of the Study Plan, providing comments on the Regional Plan, evaluation of alternative transmission solutions, and evaluation of public policy requirements. Unless otherwise specified in the BPM, the following minimum timeframes will serve as guidelines that the PMC intends to observe when requesting input at the various stages of the planning process described above to achieve the open and transparent planning process contemplated by this BPM:

- Posting of PMC actions or decisions: 5 business days after approval.
- Posting notices for requests for input: On dates identified in the planning process timeline or within 5 business days of PMC or subcommittee request.
- Response to notices, requests for information, etc.: 10 business days after posting notice.

Additional opportunities for participation are listed below.

- Local: Stakeholders have opportunities to participate in and provide input to local transmission plans as provided for in each TO's OATT.
- Subregional: Stakeholders have opportunities to participate in and provide input into subregional planning efforts within the [Sierra Subregional Planning Group](#) (SSPG), [Colorado Coordinated Planning Group](#) (CCPG), and [Southwest Area Transmission](#) (SWAT).
- Regional: Stakeholders have opportunities to participate in and provide input to the regional planning efforts as described in this BPM.
- Interregional: All transmission planning regions within the United States portion of the Western Interconnection have agreed to join together for an annual interregional coordination meeting. The annual meeting is open to stakeholders and will be held on a date mutually agreed to by the planning regions and will be noticed on the WestConnect website.
- Interconnection: Stakeholders have opportunities to participate in and provide input to the regional planning efforts within the Western Electricity Coordinating Council (WECC) planning organizational structure.

### 3.2.2 Confidentiality Requirements

WestConnect may use information from multiple levels of planning processes to develop the Regional Plan. Stakeholders requesting base case and specific modeling data will need to have a current Non-Disclosure Agreement (NDA) signed with WECC, in addition to satisfying WestConnect's own confidentiality and NDA requirements, for access to this information. Additional public information, including meeting announcements, is available on WestConnect's website ([www.westconnect.com](http://www.westconnect.com)).

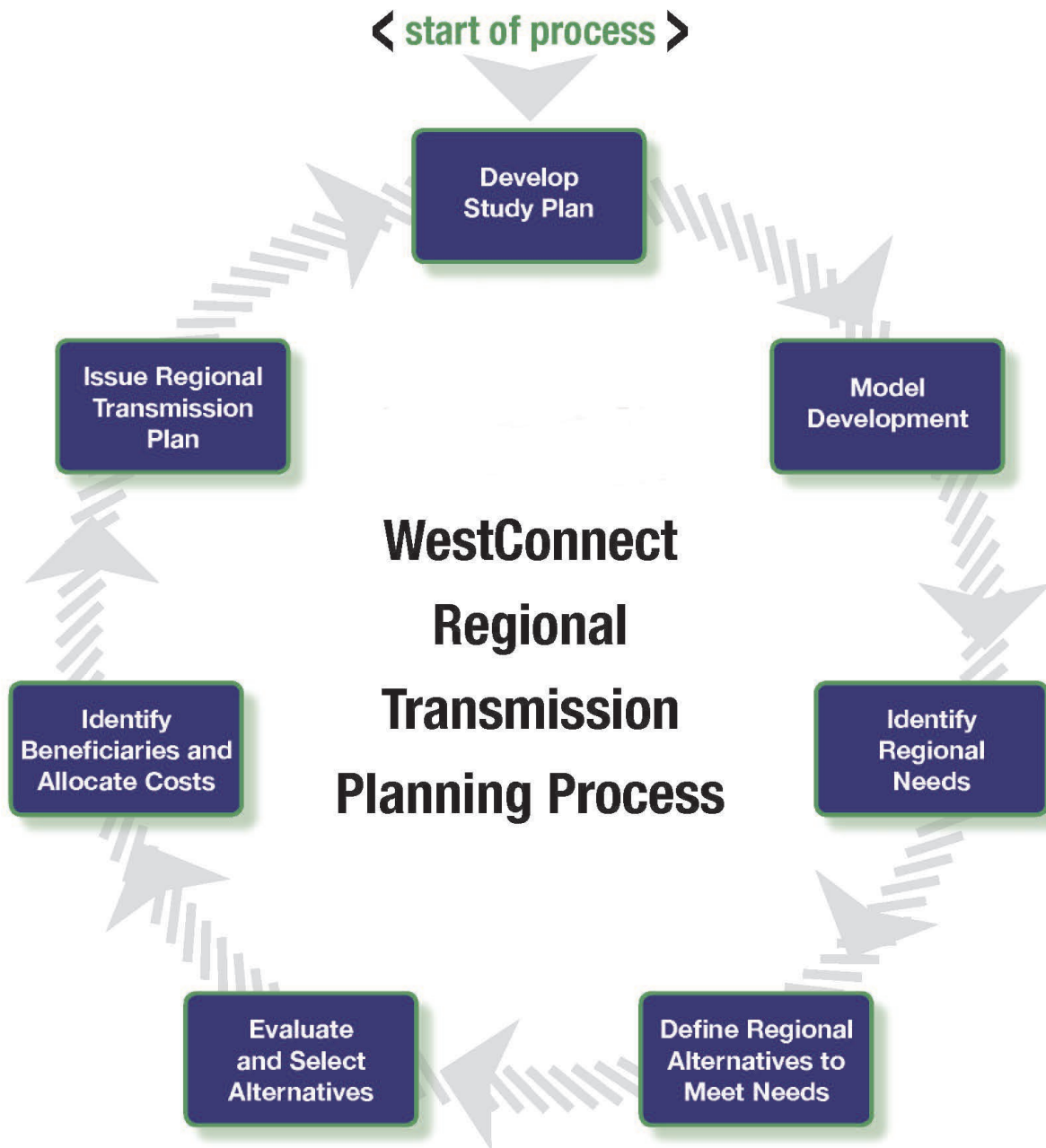
Although the regional planning process is open to all stakeholders, stakeholders will be required to comply at all times with certain applicable confidentiality measures necessary to protect confidential information, proprietary information, or Critical Energy Infrastructure Information (CEII). From time to time, the regional transmission planning studies may include access to base case data that are WECC proprietary data, information classified as CEII by FERC, or other

information identified as confidential or proprietary. [Important note: Meetings containing CEII or other confidential information will be conducted in closed session or in such other manner as to maintain the confidentiality of the information being shared or discussed.] In such cases, access to such confidential or proprietary information shall be limited to only those stakeholders that (i) hold membership in or meet the nondisclosure requirements of WECC; and (ii) satisfy the confidentiality requirements of WestConnect, execute a WestConnect NDA, and submit it to [NDA@westconnect.com](mailto:NDA@westconnect.com). The NDA can be accessed on the WestConnect website ([http://regplanning.westconnect.com/regional\\_planning\\_nda.htm](http://regplanning.westconnect.com/regional_planning_nda.htm)).

## 4.0 Planning Process

The WestConnect regional transmission planning process consists of seven primary steps as outlined in Figure 2 below. Each process step is described in greater detail in the subsequent sections of this BPM. A timeline for the completion of each process step within the biennial planning cycle is outlined in Figure 3.

Figure 2. Regional Transmission Planning Process



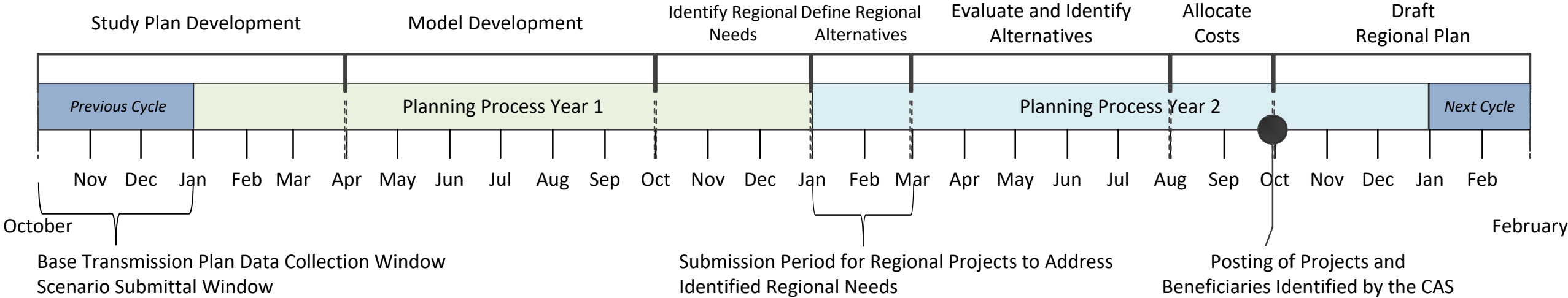
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Figure 3. Transmission Planning Process Schedule



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## 4.1 WestConnect Regional Study Plan

At the start of each biennial planning cycle, the PS will develop a Regional Study Plan (Study Plan) for presentation to and action by the PMC no later than the end of Quarter 1. The development of the Study Plan may be initiated as early as Quarter 8 of the previous planning cycle. The Study Plan will identify the scope and schedule of the study work to be performed during the planning cycle and may include the following items:

- The base cases to be evaluated, including power flow and production cost modeling cases;
- Modeling qualifiers, including the study time frame, seasons, and loading conditions to be studied;
- The starting WECC power flow and production cost modeling cases that are to be used to develop the planning models;
- The applicable studies to be performed, which may include, but are not limited to, steady-state power flow, transient stability studies, and production cost modeling analysis;
- The planning data and assumptions to be used to develop the base cases, including, but not limited to, those related to demand forecasts, generation additions and retirements, transmission infrastructure changes, and public policy requirements (i.e., enacted public policy);
- The identification of public policy requirements (enacted public policy) addressed within the TOs local planning processes and embedded in the plans submitted to WestConnect;
- A listing of scenarios, representing alternate but plausible futures, that WestConnect will study within the planning cycle;
- A description of the computer software to be used to perform the technical studies and the methodology and criteria that will be used to evaluate the reliability-, economic-, and public policy-based regional needs of the transmission system;
- The identification of any entities directed to perform a particular technical study or portions of a technical study; and
- A proposed schedule for stakeholder meetings to occur during the planning cycle and the means for notification of any changes thereto, and the location on the WestConnect website of information relating to the technical studies.

The draft Study Plan will be shared with adjacent regional planning entities prior to the annual interregional coordination meeting, as more fully described in Section 4.9, and, to the extent possible, comments and feedback provided during the sharing and coordination of this information will be reviewed by the PMC for consideration in finalizing WestConnect's Study Plan. Furthermore, the WestConnect PMC members and other interested stakeholders will have an opportunity to review and comment on the draft Study Plan before it is finalized and approved by the PMC.

### 4.1.1 Base Transmission Plan

WestConnect's regional base transmission plan will be used to establish the transmission network topology modeled in the power flow and production cost modeling studies used to identify the region's transmission needs. The base transmission plan will consist primarily of TO facilities identified in local planning processes and facilities identified in the previous planning cycle not subject to reevaluation. During the development of the Study Plan, the PS will identify those



incremental transmission facilities, as described below, that are to be recommended to the PMC for inclusion in the base transmission plan. The PS may coordinate discussion around WestConnect's Transmission Planning Project List (TPPL) during Quarter 8 of the previous planning cycle to identify the TO's incremental transmission facilities that are to be included in the base transmission plan, and the non-ETO transmission projects that wish to be considered for inclusion in the base transmission plan<sup>10</sup>. The PS will then apply the criteria outlined in Section 4.1.1.2 below to identify those non-ETO projects that are to be recommended to the PMC for inclusion in the base transmission plan, as well as those projects that fail to meet the criteria and therefore are not recommended to be included in the base transmission plan.

#### **4.1.1.1 Criteria for Including Projects in the Base Transmission Plan**

WestConnect's regional base transmission plan will consist of the planned projects<sup>11</sup> identified in the transmission plans developed by the WestConnect ETO Members in accordance with Order Nos. 890 and 1000, including any assumptions they may have made with regard to other incremental regional transmission facilities in the development of those plans. As defined by WestConnect, planned facilities include projects that have a sponsor, have been incorporated in an entity's regulatory filings, have an agreement committing entities to participate and construct, or for which permitting has been or will be sought.

Finally, transmission projects identified for inclusion in the Regional Plan, including those selected for the purposes of cost allocation, in previous planning cycles that are no longer subject to reevaluation will also be included in the regional base transmission plan. Collectively, all of these projects will be used to establish the benchmark cases against which regional transmission needs are identified and proposed transmission projects and non-transmission alternatives satisfying those identified regional needs are assessed.

#### **4.1.1.2 Criteria for Including Non-ETO Transmission Projects in the Base Transmission Plan**

Non-ETO transmission projects may be considered in the development of the base transmission plan to the extent there is sufficient certainty associated with these projects to warrant their inclusion in the base transmission plan. Non-ETO projects are subject to the same reliability standards as WestConnect ETO projects. Such projects must also complete studies that identify system impacts and all network upgrades caused by the interconnection of its project with the WestConnect transmission grid to be consistent with the interconnection and transmission service request provisions in TOs' OATTs. The project developer is responsible for properly registering with the North American Electric Reliability Corporation (NERC) and WECC in accordance with NERC and WECC registration requirements. In addition, project developers shall comply with appropriate FERC, NERC, WECC, and regional requirements.

Project information provided to WestConnect by a project developer will be used to assess the likelihood of the project being in service in the relevant study timeframe and therefore, appropriate for inclusion in the regional base transmission plan. The criteria used to establish this likelihood are described below.

<sup>10</sup> Non-ETO transmission projects refer to those projects that are being developed by merchant developers or independent transmission companies. Merchant transmission projects are defined as those for which the costs of constructing the proposed transmission facilities will be recovered through negotiated rates instead of cost-based rates (i.e. project costs are recovered outside of the Order 1000 cost allocation process).

<sup>11</sup> Planned projects may include transmission projects and/or non-transmission projects.

**Criterion 1: System Impact Assessment**

For a non-ETO transmission project to be included in the WestConnect regional base transmission plan, it must have completed a system impact study or studies that have been approved by all interconnecting system facility owners and affected system owners, and the project definition, as submitted to WestConnect, must include any infrastructure required to mitigate the surrounding system impact of the project in accordance with applicable NERC criteria.

**Criterion 2: Construction Status**

A transmission project that is currently under construction is automatically recommended to the PMC for inclusion in the WestConnect regional base transmission plan. A project that is not currently under construction is further considered in subsequent criteria.

**Criterion 3: ETO Member Planning Assumptions**

A transmission project that has been assumed in service for the purposes of an ETO Member's local planning process will also be recommended to the PMC for inclusion in the WestConnect regional base transmission plan. If an ETO Member's local plans are not based on the assumption that the project will be in service within the study timeframe, the project will be considered for inclusion in the WestConnect regional base transmission plan according to the remaining criteria.

**Consideration of Criterion 4: Financial and Implementation Status Indicators**

The PS, in consultation with stakeholders, shall review each non-ETO transmission project submitted for inclusion in the base transmission plan in accordance with Criterion 4, which serves as a proxy for certainty on a project moving to the construction phase. The group will use the criterion to make an informed judgment on the status of the project.

**Criterion 4: Financial and Implementation Status Indicators**

Information provided by the project sponsors will be used to assess the development status of non-ETO projects. Four financial and implementation status indicators are used to evaluate the project in Criterion 4. A project must pass each of the four indicators for the PS to recommend the project to the PMC for inclusion in the regional base transmission plan.

1. Has the project executed construction or EPC contracts of at least 50% of the project's total construction/EPC costs?
  - a. Describe the financial arrangements that enabled the project to execute the contracts.
  - b. Provide details regarding the construction commitments (e.g., contractor, start date).
2. Does the project have executed binding transmission service agreements (TSAs) with credit-worthy counterparties that allow the project developer to recover at least 70% of the revenue requirement of the project?
  - a. If yes, and
    - 1) The project developer is FERC-jurisdictional, please provide the date(s) the TSAs were either filed with FERC or included in the developer's Electric Quarterly Reports, as applicable, or
    - 2) The project developer is not FERC-jurisdictional, provide the date(s) of when the TSAs were executed

3. Is a federal permit required for the project?
  - a. If yes, has a Record Of Decision (ROD) been issued?
4. Is/are a state permit(s) required?
  - a. If yes, has/have all necessary permits been obtained?

To determine whether or not a non-ETO project will be included in the WestConnect regional base transmission plan, the project must pass Criterion 1 (System Impact Assessment) and either Criterion 2 (Construction Status) or Criterion 3 (ETO Member Planning Assumptions). Those projects not under construction and not assumed in an ETO Member's planning process used to develop the local transmission plans must be reviewed by the PS, in consultation with stakeholders, in accordance with Criterion 4 (Financial and Implementation Status Indicators) in order to be recommended for inclusion in the WestConnect regional base transmission plan. As a final step, all projects that are recommended by the PS for inclusion in the WestConnect regional base transmission plan will undergo a final review by the PMC, which reserves the right to exclude projects on an individual basis.

If a non-ETO transmission project proponent requests a specific generation project(s) to be modeled together with their transmission project, and that generation project(s) is not under construction, the generation project(s) will be evaluated by the PS to determine if they will be recommended to the PMC for inclusion in the base transmission plan models. Only those non-ETO generation projects that have binding transmission service agreements with all WestConnect member entities, as applicable, along the path from source to sink, or at least as far as the WestConnect planning region boundary, and that have an interconnection agreement with the interconnecting transmission provider, which is either executed or filed with FERC, will be recommended for inclusion in the base transmission plan models. If the PMC approves the non-ETO generation to be included in the base transmission plan models, the non-ETO transmission project proponent will be asked to submit to WestConnect models for any network upgrades required to satisfy the transmission service agreements executed by the generation. In addition, the non-ETO transmission project proponent will be asked to submit a generator model(s) consistent with the model(s) used for the generator's interconnection agreement(s). Models of interconnection facilities and any network upgrades required to mitigate the impact of the generation to the interconnecting system(s) and any affected systems, in accordance with applicable NERC criteria, must also be submitted to WestConnect.

#### 4.1.2 Regional Scenario Submittal Process

Regional scenarios may be considered in the biennial planning cycle and will be identified during the development of the Study Plan by the PS and through an open request window. Stakeholders will have an opportunity to submit regional scenarios to WestConnect for consideration as early as Quarter 8 of the previous planning cycle (see Figure 4). These scenarios will consider alternative

sets of assumptions than those used in the development of the base cases,<sup>12</sup> but the study of a scenario will not result in the identification of a regional transmission need<sup>13</sup>.

The PS will develop an initial recommendation of scenarios to include in the biennial Study Plan for PMC approval. The PMC may receive more proposed regional scenarios than it is effectively able to evaluate within a given planning cycle, or may determine that certain proposed scenarios are not within the scope of the regional planning process. The PMC will notify the submitters of proposed scenarios accordingly.

## 4.2 Model Development

Upon approval of the final Study Plan, and during Quarter 2 and Quarter 3 of the biennial planning cycle, the power flow and production cost models needed to perform the technical studies outlined in the Study Plan will be developed as described below.

### 4.2.1 Data and Assumptions

The data and assumptions used to develop the models for the technical studies performed in support of the WestConnect regional transmission planning process will be consistent with the study assumptions outlined in the Study Plan. The PS will use regional system WECC-approved base cases, as identified in the Study Plan, as a reference point from which the regional power flow and economic models, as applicable, are developed. During Quarter 8 of the previous cycle through Quarter 2 of the biennial planning cycle, the PS will collect the data needed to update these cases to reflect the specific assumptions outlined in the Study Plan.

At a minimum, the data collected and used to develop the study models will reflect enacted public policies and consist of load forecasts, existing and incremental resources and resource retirements, and the existing and planned transmission topology, and will be derived from WECC data as updated or supplemented by WestConnect ETOs and non-ETO transmission developers, as needed, in the WestConnect Planning Region. This process follows a bottom-up approach in which ETOs and non-ETO transmission developers, as applicable, provide information on projects to WestConnect based on assessments of their individual systems or, in the case of non-ETO transmission developers, economic analysis studies, together with the data and assumptions used in performing those assessments.

TOs, with input from stakeholders in accordance with Order No. 890 and other planning attachments, perform local planning studies to determine reliability needs and include new facilities to meet native load and network customers' requirements. Stakeholders are encouraged to participate in local TOs' Order No. 890 open stakeholder meetings to discuss local data assumptions pertaining to loads and resources.

<sup>12</sup> Alternative assumptions considered in the scenario analysis may include, but are not limited to, those related to the demand forecasts, generation additions and retirements, or transmission infrastructure changes. Non-transmission Alternatives may also be considered in future scenarios such as a change in Distributed Generation (DG) and/or Demand Side Management (DSM) (Energy Efficiency [EE], Demand Response [DR]) or changes to public policy considerations.

<sup>13</sup> Regional transmission needs are those driven by the criteria applicable to reliability, economic and public policy requirements.

#### 4.2.1.1 Production Cost Modeling

The PS will perform production cost model analysis to analyze whether there are projects that have the potential to reduce the total delivered cost of energy by alleviating congestion and/or providing other economic benefits to the transmission system located within the WestConnect Planning Region. The data used to develop the base case production cost model will be consistent with the data used to develop the base regional power flow models (e.g., with regard to load forecasts, resource additions and retirements, and the transmission network topology).

Data collected by the PS specifically for input into the production cost model will include, but is not limited to, fuel price assumptions, generator maintenance and forced outage rates, heat rate curves, ramp rates, startup costs, and variable operation and maintenance costs. This data will be developed by the PS in a manner consistent with the study assumptions outlined in the Study Plan and may rely upon WECC data as default inputs, or may be derived from WECC data as updated or supplemented by WestConnect PMC Members and stakeholders, and may be subject to WestConnect confidentiality requirements.

#### 4.2.1.2 Transmission Topology

As part of the data collection process initiated in Quarter 2 of the biennial planning cycle, the PS will request that ETO Members submit to WestConnect the data and information necessary to properly model any incremental transmission facilities identified in their local transmission plans not reflected in the WECC cases used as the starting point for the regional models. Similarly, the PS will request the ETO Members identify any projects that may have been cancelled and are included in the WECC cases so that they can be removed from the regional models.

During the development of the study models, the PS will also review the planned facilities included in the starting WECC cases to verify that only those non-ETO transmission projects selected for inclusion in the base transmission plan are included in the models used for the regional reliability, economic, and public policy assessments. In the event any project selected for inclusion in the base transmission plan is determined to not be included in the starting WECC cases, the PS will request the project sponsor submit the data necessary to properly add the project to the models. The project sponsor will have two weeks to provide the requested information, at which point, if the information has not been provided, the project may not be included in the study models. At the same time, non-ETO transmission projects not selected for inclusion in the base transmission plan will be removed if found to be modeled in the WECC cases used as a starting point for the regional models.

### 4.3 Evaluate System and Identify Regional Needs

This section describes the process for identifying regional needs initiated typically during Quarter 4 of the cycle. All regional analyses described below may be performed either by the respective subcommittee members with the technical expertise to perform such studies or by a third-party consultant, at the direction of the PMC.

#### 4.3.1 Initial Evaluation and Validation of Regional System Base Case

As part of the model development process, WestConnect will work with the members, and stakeholders to ensure the study models developed as described in Section 4.2 are properly validated and ready to perform the regional reliability and economic assessments described below.

## 4.3.2 Perform System Assessment

### 4.3.2.1 Reliability—Power Flow Analysis

During Quarter 4 of the biennial planning cycle, WestConnect will use its regional power flow models to perform a regional reliability assessment(s) that evaluates the WestConnect region holistically to ensure that local TO plans are simultaneously feasible under a consistent set of data assumptions. The PS will determine the applicable studies to be performed which may include, but are not limited to, steady-state power flow, voltage, stability, short circuit, and transient studies as approved in the Study Plan. Among the data assumptions applied to these studies will be any operating procedures or operating schemes maintained by the individual TOs. If a single-system reliability violation (a NERC Transmission Planning (TPL) violation) is identified as part of this power flow evaluation, the violation will be referred back to the appropriate TO for resolution. Single-system reliability violations usually do not cause a regional reliability driven transmission need. In the event a simulated outage produces NERC TPL violations in more than one ETO Member's system, that violation may result in the identification of a regional reliability-driven transmission need. Some reliability studies that show potential reliability issues may not result in the identification of regional reliability needs based on the review and consideration of those issues by the PMC.

### 4.3.2.2 Economic—Production Cost Model

If production cost modeling analysis initiated by the PMC identifies regional transmission congestion within the WestConnect planning region in more than one ETO Member's area, this congestion may result in the identification of a regional economic-driven transmission need. Under the regional planning process, the PMC will identify more efficient or cost-effective regional transmission projects to meet any identified economic-driven transmission needs, but will not modify local transmission plans. Not all congestion or economic-related issues identified during the production cost modeling analysis will result in the identification of regional economic needs.

### 4.3.2.3 Public Policy Requirements

Enacted public policy (e.g., but not limited to, Renewable Portfolio Standards, energy efficiency/demand side management and distributed generation standards) is considered in the regional planning process. Non-enacted or proposed public policies may be considered as part of the scenario planning process as described in Section 4.1.2. For example, the PMC may decide to evaluate a proposed public policy as a scenario in a given planning cycle if it is sufficiently reasonable and probable to warrant evaluation as an alternative future for the region.

Enacted public policies are considered early in the planning process and are incorporated into the base transmission plan through the rollup of local TO plans. After identifying any enacted public policies that are driving local transmission needs as reflected in the local TO plans, the PMC will seek the input of stakeholders to identify regional transmission needs driven by those policies. The PMC will then decide if public policy-driven regional transmission need(s) exist. Further, if power flow and economic modeling indicates the potential to more efficiently or cost effectively meet a transmission need driven by public policy requirements of two or more ETO Members, that determination may result in the identification of a regional public policy requirement-driven need. The PMC will determine the subset of regional transmission needs driven by public policy requirements for which solutions will be evaluated from the larger set of potential regional transmission needs driven by public policy requirements identified through this process.

### 4.3.3 Sharing of Information

WestConnect's regional transmission needs will be shared with stakeholders by posting such needs on the WestConnect website after approval by the PMC. In addition, the regional transmission needs identified by the PMC for the WestConnect region will be shared with the other regional planning entities within the United States portion of the Western Interconnection through interregional coordination during Quarter 5 of the biennial planning cycle as more fully described in Section 4.9. Section 3.2.2 describes the potential need for participants to execute NDAs in order to review certain types of information utilized in/output from the regional planning process.

## 4.4 Collect Alternatives to Meet Regional Needs

Any active member in good standing within one of the five PMC membership sectors,<sup>14</sup> may submit projects to meet an identified regional need to be considered for selection in the Regional Plan. Further, only those projects that meet the qualification criteria outlined below for valid project submittals will be evaluated in the regional planning process. The categories of projects that may be submitted to WestConnect to meet an identified regional need include:

- Transmission projects not seeking cost allocation
- Transmission projects seeking cost allocation
- Non-transmission alternatives

Projects selected for the purposes of cost allocation in previous planning cycles will be reevaluated together with those projects submitted to meet an identified regional need in the current planning cycle as more fully described in Sections 4.5 and 4.6.

Any interested stakeholder may submit project ideas for consideration by the PMC in the regional planning process without a need for that project idea to qualify as a specific project submittal for purposes of cost allocation. Stakeholders may submit ideas into the regional planning process at any time via email to [info@westconnect.com](mailto:info@westconnect.com)<sup>15</sup>. For specific project ideas to be considered as a means to meet an identified regional need by the PMC in the current planning cycle, the idea must be submitted via the project submittal process described in Section 4.4.1 using the WestConnect Regional Project Submittal Form.

### 4.4.1 Project Submittals

Projects proposed to meet an identified regional need are accepted from the start of the planning cycle. To be considered in the current planning cycle, regional projects must be submitted no later than the conclusion of the project submittal period<sup>16</sup>. The project submittal period may occur

<sup>14</sup> To become a member of a PMC membership sector, an entity must execute the WestConnect Planning Participation Agreement and comply with the terms of that agreement. An entity must also submit a Member Sector Notification, which is subject to PMC approval.

<sup>15</sup> The PMC will determine how to address a project idea submitted to WestConnect separately from the project submittal process described in Section 4.4.1.

<sup>16</sup> Interregional Transmission Projects (ITPs) must be submitted to WestConnect no later than March 31 of an even numbered year per the Interregional Coordination Process described in Appendix D. To be evaluated by WestConnect, an ITP submittal must meet the same project submittal requirements as described in Section 4.4 for regional project submittals. Once submitted, an ITP will be treated in accordance with the process described in Appendix D, and will be evaluated for inclusion in the Regional Plan in the same manner as a regional project submittal.

anytime during the planning cycle, will last no less than 30 days, and will conclude no less than 30 days following the posting of identified regional needs to the WestConnect website. See the process schedule in Figure 4, Transmission Planning Process Schedule. Projects submitted following the conclusion of the submittal period will be evaluated in the subsequent planning cycle.

Project submittals must be made using the WestConnect Regional Project Submittal Form which can be accessed on the WestConnect website

(<https://doc.westconnect.com/Documents.aspx?NID=17183&dl=1>).

## **4.4.2 Qualifications for Valid Project Submittal to Meet Identified Regional Needs**

### **4.4.2.1 General Terms**

Proposed transmission projects must meet all of the following conditions, at a minimum:

- The proposed project must identify the need it is intended to remedy.
- The project will connect to more than one TO Member, and/or benefits are expected to be shown to more than one TO Member.
- All data, applicable deposits for study costs, and other information requested by the PS to perform the analysis using the tools available to the PS must be complete.
- A single project submittal may not seek multiple study requests. To the extent a project proponent seeks to have its project studied under a variety of alternative project assumptions/configurations, each alternative must be submitted as an individual project submittal.

The PS will determine whether the proponent has provided sufficient information to evaluate the transmission proposal or other proposed solution. If the data or information is not sufficient, the PMC will request any additional information necessary to evaluate the proposal to be submitted by the project submitter within a reasonable timeframe as determined by the PMC. In general, a project submitter will have two weeks following notification from the PMC to cure any deficiencies in its project submittal form. Failure to fully cure any deficiencies identified by the PMC within the timeframe provided will constitute an incomplete submittal. If a proposal does not meet the applicable criteria or is deemed to be an incomplete submittal as described above, the project will not be evaluated in the current cycle of the transmission planning process.

If a proposed transmission project is interregional, it will be subject to the interregional coordination and joint evaluation procedures common to all planning regions within the United States portion of the Western Interconnection, as discussed in Section 4.9. As a threshold matter, for a project to be eligible for consideration as an interregional project for interregional cost allocation, it must first be selected for regional cost allocation by at least two regions.

### **4.4.2.2 Qualification Criteria**

Qualification criteria for valid project submittals include:

- Contact information and point of contact.
- Explanation of how the project is a more efficient or cost-effective solution to meet regional transmission needs.



- Explanation of how the regional project is more efficient or cost effective than the local projects it would replace.
- The project description should include, but is not limited to:
  - scope,
  - points of interconnection to existing system or facilities under construction,
  - voltage,
  - alternating current/direct current,
  - circuit configuration,
  - impedance information, and
  - approximate circuit mileage.
- Specify any special facilities required for the project. Special facilities may include, but are not limited to, series capacitors or phase-shifting transformers.
- The diagram showing the geographical location and preferred project route should include a description of general permitting consideration and challenges.
- Estimated cost of the project.
- Additional independent studies that might aid in the evaluation of the project.
- Status within the WECC path rating process and any WECC studies that have been performed on the project.
- The project in-service date.
- Change files including, but not limited to, .epcl, .epc, idevs, or python scripts to add the project to a network model for power flow and/or production cost modeling studies. In some cases, dynamic models for stability study may be required.
- Plan for post-construction maintenance and operation of the proposed line.
- A \$25,000 deposit toward the total cost of the study is required for any project submitted for consideration in the Regional Plan, and is subject to true-up (up or down) based upon the actual cost of the study.
- Provide the comparison risk score, if available, as described in the WECC Environmental Data Work Group comparison process.
- Impacts to other regions. The applicant must provide transmission system impact studies showing system reliability impacts on neighboring transmission systems or other transmission planning regions. The information should identify all costs associated with any required upgrades to mitigate adverse impacts on other transmission systems. These costs will be included with any other estimated project costs to develop the total estimated project cost.
  - If impact studies and costs are not available at the time of the submittal, the project proponent may request that impact studies be performed at the project proponent's expense as part of the project's evaluation in the regional planning process. Requests for system impact studies must accompany the project submittal and will need to be approved by the PMC. Approval will depend on whether the project proponent provides funding for the analysis. The PMC will make a determination regarding any requests for system impact studies within two weeks' time following the closing of the project submittal window.

## Qualification Criteria for Project Submittal Seeking Cost Allocation

Qualification criteria for valid project submittals seeking cost allocation include the criteria outlined in Section 4.4.2.2 plus the following:

- The project is defined within one or more of the categories in the cost allocation methodology: reliability, economic, or public policy.
- The project will be located wholly or partly within the WestConnect Planning Region<sup>17</sup>.

### 4.4.3 Project Submittal and Qualification Criteria for Non-transmission Alternatives

#### 4.4.3.1 Defining Non-transmission Alternatives

NTAs include, but are not limited to, technologies that defer or possibly eliminate the need for new and/or upgraded transmission lines<sup>18</sup>. NTAs could offer an alternative to planning, permitting, and construction of additional transmission facilities that would otherwise be necessary to benefit the planning region.

NTAs will be evaluated to determine if they provide a more efficient or cost-effective solution to an identified regional transmission need, as described below. Although NTA projects will be considered for inclusion in the Regional Plan, NTA projects are not eligible for cost allocation pursuant to specific provisions of Order No. 1000.

#### 4.4.3.2 Non-transmission Alternative Projects

NTAs are considered in the regional planning process through the roll-up of the local TO transmission plans into the base transmission plan and regional models. NTAs may also be considered in the evaluation of scenarios, and may be submitted as an alternative to meet an identified regional need.

Local utilities (TOs) evaluate NTAs through integrated resource plans and transmission plans brought before state commissions and company boards, as applicable. Stakeholders can engage at this level by participating and/or intervening in these integrated resource plan and transmission plan dockets before state commissions and engaging in TO processes as provided for each TO's OATT, and as applicable. These local TO plans are rolled up into the WestConnect Regional Plan.

To submit an NTA that addresses a regional need (i.e., not included in TOs' local plans), the proponent must submit the NTA to WestConnect during the project submittal period as defined in Section 4.4.1 and using the same Regional Project Submittal Form as transmission project proposals.

WestConnect will evaluate proposed transmission and NTA alternatives using the analytical tools available based on their relative costs, implementation risks, reliability impacts, construction timelines, and project benefits and costs within the planning timeframe. WestConnect may request additional information if it is required for the technical study evaluation.

<sup>17</sup> Interregional transmission projects, by definition, will directly interconnect electrically to existing or planned transmission facilities in two or more Planning Regions, and therefore, may be located in-part in a Region other than WestConnect.

<sup>18</sup> Such alternatives are DG resources and DSM (load management), such as EE and DR (e.g., interruptible load) programs, energy storage facilities, and smart grid equipment that can help eliminate (or mitigate) a grid reliability problem, reduce uneconomic grid congestion, and/or help to meet grid needs driven by public policy requirements.

### 4.4.3.3 Non-transmission Alternative Project Submittal Criteria

If there is a specific NTA project submitted as an option to satisfy an identified regional transmission need(s), then, at minimum, the submitter must be able to provide the information necessary for the alternative to be modeled in the planning studies. These case-by-case studies will be performed in a transparent manner to ensure objective analyses and sound results.

To the extent possible, entities submitting NTA projects should provide information as requested by the PS, which may include, but is not limited to, the following:

- Basic description of the project (fuel, size, location, point of contact)
- Operational benefits
- Load offset, if applicable
- Description of the issue sought to be resolved by the Generating Facility or NTA, including reference to any results of prior technical studies
- Network model of the project flow study
- Short-circuit data
- Protection data
- Other technical data that might be needed for generation resources
- Project construction and operating costs
- Additional miscellaneous data (e.g., change files if available)

As with entities submitting a transmission project, those who submit an NTA into the WestConnect regional planning process must adhere to and provide the same *or equivalent* information and study deposits as transmission projects, as described in Section 4.4.2.2, realizing that NTA projects are unique and some of the information criteria will not apply, depending on the type of project submitted. Should the stakeholder submitting an NTA into the WestConnect process believe certain information is not necessary, it must identify the information it believes is not necessary and provide a justification for such a conclusion.

## 4.5 Identifying Projects that Meet a Regional Need

During Quarter 6 and Quarter 7 of the biennial planning cycle, the models and studies used to identify regional transmission needs will be used to determine whether the proposed projects (transmission projects or NTAs) resolve the identified needs. In the case of regional projects submitted as more efficient or cost effective solutions to identified regional transmission needs, the models and studies used to identify the regional transmission needs will be used to ensure that the reliability of the system is maintained and no new regional reliability, economic, or public policy needs are created. Projects that resolve a reliability criteria violation (a NERC TPL violation) identified as a regional reliability need will be deemed to have met that regional reliability need. Similarly, projects that are shown to reduce congestion and variable production cost within the WestConnect planning region will be deemed to have met that regional economic need. Projects that enable enacted public policy requirements to be satisfied will be deemed to have met that regional transmission need driven by a public policy requirement. Projects that meet an identified regional transmission need and are seeking cost allocation will be reviewed to determine their eligibility to seek cost allocation as more fully described in Section 4.5.1. In the event no projects have been

proposed to meet an identified regional transmission need, the PMC will seek to develop an appropriate proposal and describe that project in the Regional Plan and it will not be subject to cost allocation.

#### 4.5.1 More Efficient or Cost-Effective Regional Solutions

Regional projects determined to be capable of meeting an identified regional need will be evaluated and selected from among competing solutions to determine the preferred solution or combination of solutions to satisfy the regional transmission needs. The solution alternatives will be evaluated on a comparable basis according to the following criteria as outlined in the WestConnect Jurisdictional TOs' Tariffs: (1) ability to fulfill the identified need practically; (2) ability to meet applicable reliability criteria or NERC Transmission Planning Standards issues; (3) technical, operational and financial feasibility; (4) operational benefits/constraints or issues; (5) cost-effectiveness over the time frame of the study or the life of the facilities, as appropriate (including adjustments, as necessary, for operational benefits/constraints or issues, including dependability); (6) where applicable, consistency with Public Policy Requirements or regulatory requirements, including cost recovery through regulated rates.

#### 4.5.2 More Efficient or Cost-Effective Projects Seeking Cost Allocation

Projects submitted to WestConnect seeking regional cost allocation must first be determined by the PMC to be a more efficient or cost-effective solution to one or more regional transmission needs as outlined in Section 4.5.1. Those projects seeking regional cost allocation that are determined to be a more efficient or cost-effective solution will then be further reviewed by the PMC to determine if they are eligible for regional cost allocation based on an evaluation of their reliability, economic and/or public policy requirement benefits, as more completely described in Section 4.6 below.

### 4.6 Allocation of Costs

Cost allocation will be performed by the CAS on projects determined by the PMC to be a more efficient or cost effective solution to an identified regional need and that further pass the regional cost allocation eligibility benefit/cost (B/C) threshold of 1.25.

In performing its regional cost allocation evaluations, the WestConnect PMC, with input from the CAS, assesses a project's costs against its benefits in accordance with the following factors:

- Benefits and beneficiaries will be identified before cost allocation methods are applied.
- Cost assignments shall be commensurate with estimated benefits.
- Those that receive no benefits shall not be involuntarily assigned costs.
- A benefit-to-cost threshold of not more than 1.25 shall be used, as applicable, so that projects with significant benefits are not excluded.
- Costs shall be allocated for regional projects solely within the WestConnect Planning Region, unless other entities or regions voluntarily assume costs.
- Costs for upgrades on neighboring transmission systems or other planning regions that are (i) required to be mitigated by the WECC Path Rating process, FERC tariff requirements, or NERC Reliability Standards, or (ii) negotiated among

interconnected parties will be included in the total project costs and used in the calculation of B/C ratios.

- Cost allocation method and data shall be transparent and with adequate documentation.
- Different cost allocation methods may be used for different types of projects.

All benefits used in the cost allocation process must be able to be reduced to a monetary value, for example, but not limited to, from fuel savings and/or avoidance of construction of other transmission facilities. All costs and benefits evaluated by WestConnect shall be expressed in monetary value and compared on a net present value basis. Potential benefits that cannot be accurately modeled or expressed as a dollar value are outside the scope of the WestConnect cost allocation process. The following sections define the WestConnect cost allocation methodology for each category of regional project consistent with the six cost allocation principles defined in Order No. 1000.

## 4.6.1 Benefits Analysis and Cost Allocation Methodologies

### 4.6.1.1 Reliability Projects for Purposes of Cost Allocation

The WestConnect cost allocation procedure will allocate costs to an ETO for system reliability improvements only when a system improvement is required for that TO to comply with the NERC TPL standards. This will ensure that no costs will be allocated to ETOs for system reliability improvements that are not necessary for their system to meet the NERC TPL standards.

The cost allocation for this category of projects will be based on the costs that each system would have been required to incur on an individual basis to comply with the reliability standards. If the PMC determines, in the course of the conducting the regional planning process, that a regional transmission project is able to provide required system reliability improvements in a more efficient or cost-effective manner than individual projects, then costs for the regional project may be allocated on the basis of the cost for an individual system to comply with reliability standards.

For example, if in response to an identified regional reliability need Company 1 proposes a reliability project that costs \$250 million and Company 2 proposes a reliability project that costs \$150 million, but a \$200 million regional project was selected as the more efficient or cost effective solution that met both companies' reliability needs, then costs could be allocated as follows:

- Company 1 allocation:  $250 / (250 + 150) * 200 = \$125$  million
- Company 2 allocation:  $150 / (250 + 150) * 200 = \$75$  million

Individual TOs have the ultimate responsibility to ensure the reliability of their systems. As such, the local transmission plans will not be modified, but WestConnect, as part of its regional planning process, may identify more efficient or cost-effective regional transmission projects. If an individual TO elects to complete a reliability project in lieu of a regional project identified in the Regional Plan for cost allocation, the regional project may be subject to re-evaluation in a subsequent planning cycle.

#### 4.6.1.2 Economic Projects Driven by Congestion Relief for Purposes of Cost Allocation

Cost allocation for economic projects that provide for more economic operation of at least two member systems in the region will be based on the calculation of economic benefits that each system will receive. The economic benefits will be measured in the form of production cost savings resulting from a model run with the proposed project as compared to the model run without the proposed project.

For a project to be selected for regional cost allocation it shall have a B/C ratio greater than 1.0 under each reasonable scenario and an average B/C ratio of at least 1.25 for all reasonable scenarios evaluated.<sup>19</sup>

The treatment of uncertainty inherent in the planning process shall include sensitivity analyses to ensure that benefits will actually be received by beneficiaries with relative certainty<sup>20</sup>. Projects for which benefits and beneficiaries are highly uncertain and vary beyond reasonable parameters based on assumptions about future conditions may not be selected for cost allocation by the PMC.

The cost of any project that has an average 1.25 B/C ratio or greater will be divided among the ETO Members that show a benefit based on the amount of benefits calculated for each TO. For example, if a \$100 million project is shown to have \$150 million in economic benefit, the entities for which the economic benefit is incurred will be determined. The cost of the project will then be allocated to those entities, based on the extent of each entity's economic benefits relative to the total project benefits. This will ensure that each entity that is allocated cost has a B/C ratio equal to the total project B/C ratio. For example:

- Project with \$150 million in economic benefit and \$100 million in cost
  - Company 1 has \$90 million in benefits; Company 2 has \$60 million in benefits
  - Company 1 allocation:  $90/150 (100) = \$60$  million
  - Company 1 B/C ratio:  $90/60 = 1.5$
  - Company 2 allocation:  $60/150 (100) = \$40$  million
  - Company 2 B/C ratio:  $60/40 = 1.5$

Measurement of production cost savings is best accomplished through a production cost simulation. The models employed shall appropriately consider the hurdle rates and generation must run requirements between transmission systems to accurately model the impact of transmission projects on production cost and system congestion. Because the entities in the WestConnect Planning Region do not operate in a Regional Transmission Organization (RTO), and an energy market is not in place, modeling techniques should be used to ensure that, on a bilateral basis, the transactions modeled are likely to actually occur. For instance, this might be accomplished by modifications to the hurdle rate (a price adder included in production cost modeling to reflect

<sup>19</sup> Economic projects developed through a TO's local transmission planning process or a state process will be considered local projects for purposes of Order No. 1000 compliance and are not eligible for regional cost allocation.

<sup>20</sup> WestConnect recognizes that the results of planning studies and the calculation of benefits depend on the input assumptions used in the analysis. Because these input assumptions involve forecasts of future values, there is uncertainty concerning actual future conditions. This uncertainty can be addressed through scenario planning or sensitivity analysis. The scenario/sensitivity analyses may include, but are not limited to, consideration of changes in: forecast of peak demand and energy consumption; dates when proposed facilities will be in service; location and mix of future generation, including retirements; fuel prices; discount rates; and rate of inflation.

transactional friction to the occurrence of power exchanges which may include, but is not limited to, transmission rates, losses, and an adequate profit margin).

Reduction in reserve sharing requirements is an economic benefit that can be readily calculated as a justification for economic projects; however, unlike many RTO regions, the boundaries of reserve sharing groups in WestConnect do not (at this time) align with the WestConnect Planning Region. By only allocating costs to entities based on the degree to which that entity shows benefits (i.e., allocating benefits individually to entities rather than communally to reserve sharing groups), the issue of inequities related to different reserve sharing groups will be avoided. Reduction in reserve sharing requirements can be included in the production cost model when appropriate.

The following production cost principles may be applied, as determined by the PMC with input from the CAS:

- The production cost savings from a project must be present in each year from the project in-service date and extending out at least 10 years.
- Cost savings must be expressed in present-value dollars and should consider the impact of various fuel cost forecasts.
- The production cost study must account for contracts and agreements related to the use of the transmission system (this refers to paths in systems that might be contractually limited but not reliability limited).
- The production cost study must account for contracts and agreements related to the access and use of generation (this refers to generators that might only use spot purchases for fuel rather than firm purchases, or generation that has been designated as network resources for some entities and thus cannot be accessed at will by non-owners).

#### **4.6.1.3 Public Policy Projects for Purposes of Cost Allocation**

The PMC will determine if a regional public policy project submitted for cost allocation is the more efficient or cost effective solution to meet an identified regional transmission need driven by public policy requirements. The costs of these projects selected in the Regional Plan for purposes of cost allocation shall be shared proportionally among the entities that will access the resources enabled by the project to meet their public policy requirements<sup>21</sup>.

The process to interconnect individual generation resources would be provided for under the generator interconnection section of each TO's OATT, not under this process.

#### **4.6.1.4 Combination of Benefits for the Purposes of Cost Allocation**

The WestConnect planning process and cost allocation procedure recognizes that a transmission system addition may result in multiple categories of benefits. For example, a project required to meet system reliability standards might also allow for more economical operation of the system and

<sup>21</sup> If an identified beneficiary encounters load and resource determinations at the state or local level that do not provide for the particular resource used for the cost allocation of a public policy project to be part of the chosen resource mix, then the reevaluation process will include consideration of whether a regional public policy-driven transmission need still exists, once the benefits to the previously-identified project beneficiary are removed from the analysis. The previously-identified entity cannot be allocated public policy-driven project costs in this situation because there will be no megawatt share of the resource accessed by such entity, because its governing authorities have dictated a different resource mix. Without the resource, the entity has no need for transmission facilities to enable access to the resource.

for compliance with public policy requirements. If a project seeking cost allocation is determined to be the more efficient or cost effective solution to one or more of the identified regional needs but cannot pass the cost allocation threshold using a single category of benefits alone (reliability, economic, or public policy), the sum of the benefits from each benefit category may be considered. When multiple categories of benefits are considered, costs shall be allocated in accordance with the cost allocation procedure defined for each category of benefits. For each benefit category considered, the benefits provided by that category in proportion to the total project benefits shall be used to allocate a percentage of the total project costs to that category of benefits. To illustrate, consider the following example where a regional project seeking cost allocation selected as a more efficient or cost-effective solution to an identified regional need driven by public policy requirements might also provide for economic benefits to the same beneficiaries:

A regional project seeking cost allocation and selected as a more efficient or cost-effective solution to an identified need has undergone analysis for its quantifiable benefits and costs and is determined to cost \$100 million and produce benefits to identified beneficiaries in two categories: economic benefits of \$101 million (on average, under all reasonable economic scenarios evaluated), and public policy related benefits of \$70 million. The project is found to fail the cost allocation threshold for each category of benefits, individually, but when the total benefits are combined and the project's total regional benefits per beneficiary are weighed against the project's total costs per beneficiary, the project can be found to meet or surpass the region's 1.25 to 1 B/C threshold per beneficiary:

- Regional project's cost: \$100 million
- Regional project's total economic benefits: \$101 million
  - Assume, Beneficiary A and Beneficiary B share economic benefits equally (50/50); therefore, project costs are to be allocated equally.

Beneficiary A share of economic benefits = \$50.5 million (50%)  
 Beneficiary A share of regional project's cost = \$50 million (50%)  
 B/C ratio for Beneficiary A = 1.01

Beneficiary B share of economic benefits = \$50.5 million (50%)  
 Beneficiary B share of regional project's cost = \$50 million (50%)  
 B/C ratio for Beneficiary B = 1.01
- Regional project's total public policy requirement (p.p.) benefits: \$70 million
  - Assume, Beneficiary A and Beneficiary B split the public policy requirement benefits 60/40, respectively; therefore, project costs are to be allocated according to this proportion.

Beneficiary A share of p.p. benefits = \$42 million (60%)  
 Beneficiary A share of regional project's cost = \$60 million (60%)  
 B/C ratio for Beneficiary A = 0.7

Beneficiary B share of p.p. benefits = \$28 million (40%)  
 Beneficiary B share of regional project's cost = \$40 million (40%)  
 B/C ratio for Beneficiary B = 0.7



- Regional project's total benefits: \$171 million (\$101 million in economic benefits plus \$70 million in public policy benefits).
  - Proportion of benefits attributed to economic benefits = \$101 million/\$171 million (59%)
    - 59%, or \$59 million, of the regional project's cost will be allocated based on economic benefits
    - Beneficiary A and Beneficiary B share economic benefits equally (50/50); therefore, 59% of the regional project's costs are to be allocated as follows:
      - Beneficiary A share of regional project cost based on economic benefits = \$29.5 million (50% of \$59 million)
      - Beneficiary B share of regional project cost based on economic benefits = \$29.5 million (50% of \$59 million)
  - Proportion of benefits attributed to p.p. benefits = \$70 million/\$171 million (41%)
    - 41%, or \$41 million, of the regional project's cost will be allocated based on p.p. benefits
    - Beneficiary A and Beneficiary B split the public policy requirement benefits 60/40, respectively; therefore, 41% of the regional project's costs are to be allocated as follows:
      - Beneficiary A share of regional project cost based on p.p. benefits = \$24.6 million (60% of \$41 million)
      - Beneficiary B share of regional project cost based on p.p. benefits = \$16.4 million (40% of \$41 million)
  - Combined B/C Ratio:

Beneficiary A share of economic benefits = \$50.5 million (50% of economic benefits)

Beneficiary A share of p.p. benefits = \$42 million (60% of p.p. benefits)

**Beneficiary A total combined benefits = \$92.5 million**

Beneficiary A share of regional project cost based on economic benefits = \$29.5 million

Beneficiary A share of regional project cost based on p.p. benefits = \$24.6 million

**Beneficiary A share of regional project's cost = \$54.1 million**

**B/C ratio for Beneficiary A = 1.71**

Beneficiary B share of economic benefits = \$50.5 million (50% of economic benefits)

Beneficiary B share of p.p. benefits = \$28 million (40% of p.p. benefits)

**Beneficiary B total combined benefits = \$78.5 million**

Beneficiary B share of regional project cost based on economic benefits =  
 \$29.5 million  
 Beneficiary B share of regional project cost based on p.p. benefits = \$16.4  
 million  
**Beneficiary B share of regional project's cost = \$45.9 million**  
**B/C ratio for Beneficiary B = 1.71**

#### 4.6.1.5 Single-System Projects for Purposes of Cost Allocation

Single-system transmission projects only impact a single ETO Member; therefore, only a single entity could be allocated the cost (i.e., the project affects only one set of customers). In many areas of the West, transmission facilities may span multiple service territories or footprints but only provide service to a single entity. These projects will be considered single-system transmission projects. These projects can also be referred to as "local projects" pursuant to Orders 890 and 1000 (see BPM Section 4.7.1).

The procedure described in this BPM for the calculation of benefits and the allocation of costs applies to regional transmission projects selected in the WestConnect regional transmission planning process for the purposes of cost allocation. Single-system projects are outside the scope of the WestConnect regional cost allocation procedure and are not eligible for regional cost allocation unless they provide benefits to other systems in the region and have been submitted in the regional process for purposes of regional cost allocation. However, the impact of single-system transmission additions will be included in the evaluation of need for regional transmission projects. Adverse impacts on neighboring systems associated with single-system projects shall be mitigated in accordance with existing WECC procedures.

## 4.7 Develop the Regional Plan

By Quarter 8 of the biennial planning cycle, after appropriate stakeholder review and input, the PMC will vote to approve the Regional Plan. The Regional Plan will document why projects were either selected or not selected in the Regional Plan. Projects that are selected in the WestConnect Regional Plan will include:

- Local projects
- Regional transmission facilities and NTAs that meet the identified regional needs more efficiently or cost-effectively and have not been selected for purposes of cost allocation (see Section 4.5)
- Regional transmission facilities that meet the identified regional needs more efficiently or cost-effectively and have been selected for the purposes of cost allocation (see Section 4.6)

Other projects identified in the Regional Plan may include non-ETO projects included in the base transmission plan, regional transmission facilities and NTAs submitted to meet the identified regional needs that have not been selected as the more efficient or cost effective solution, and regional projects from previous planning cycles no longer subject to reevaluation.

### 4.7.1 Local Projects

A local transmission facility is a facility located solely within a WestConnect ETO Member's retail distribution service territory or footprint<sup>22</sup>. This would include facilities identified in local transmission plans that are "rolled up" and included in the regional base transmission plan without going through a needs analysis at the regional level (and therefore are not eligible for regional cost allocation). Planned projects developed through a TO's local transmission planning process will be included in the Regional Plan without going through a regional needs analysis and will not be eligible for cost allocation.

Single-system projects, or single-system NTAs, are also considered local projects (or local NTAs), but the difference between the uses of the two terms may reside in who proposes the project. As described above, "local projects" is a term used to identify single-system projects developed through an ETO Member's local transmission planning process. Single-system transmission projects proposed by a stakeholder other than an ETO Member that only impact a single system TO, such that only a single entity could be allocated the cost (i.e., the project affects only one set of customers), are outside the scope of the regional cost allocation procedure as more fully described in Section 4.6.1.5.

### 4.7.2 Projects Selected in the Regional Plan not for the Purposes of Cost Allocation

Projects (transmission facilities or NTAs) that have been shown to be a more efficient or cost-effective solution to an identified regional need (as described in Section 4.5.2) but have not requested or have not been selected for the purposes of cost allocation will be identified in the Regional Plan. Cost recovery for these projects will be determined outside of the regional planning process and may include participant-funded or merchant projects submitted to WestConnect to meet an identified regional need<sup>23</sup>.

### 4.7.3 Projects Selected in the Regional Plan for the Purposes of Cost Allocation

Projects seeking cost allocation that have been shown to be a more efficient or cost-effective solution to an identified regional need and have passed the applicable cost allocation B/C thresholds as defined in Section 4.6 will be processed in the manner set forth below before being included in the Region Plan:

The CAS is to submit, for review and comment, the results of its project benefit/cost analysis and beneficiary determination to the PMC and to the identified beneficiaries of the transmission projects proposed for cost allocation. The PMC will make available to its beneficiary Members sufficient

<sup>22</sup> For purposes of this document, the phrase "solely within a WestConnect ETO's retail distribution service territory or footprint" is interpreted to imply within a company's electric topology footprint and not necessarily the geographical footprint. Many TOs' and providers' territory within WestConnect are physically intertwined and overlap or are non-contiguous. The physical spatial relationship of any transmission line would be difficult to determine during the planning process due to impacts based on implementation and siting of the facility. Therefore, this document assumes the transmission facility is solely within the WestConnect provider's retail distribution territory or footprint if the proposed facility is within the electric topological footprint of an ETO Member and is electrically intended to provide service to a single entity, and costs are borne by only one set of customers regardless of the physical location of the facility.

<sup>23</sup> Merchant or participant-funded projects submitted to WestConnect at the start of the planning cycle for consideration for inclusion in the regional base transmission plan may be identified in the Regional Plan if they are selected for inclusion in the base transmission plan according to the criteria outlined in Section 4.1.1.2.

information to allow for a reasonable opportunity to comment on the proposed selection. The PMC will not make a determination on the project benefit/cost analysis and beneficiary determination until it has reviewed all comments. Upon approval of the PMC, the project benefit/cost analysis and beneficiary identifications shall be posted by the PMC on the WestConnect website.

#### 4.7.4 Selecting an Eligible Transmission Developer to Utilize Cost Allocation

For any project selected in the Regional Plan for purposes of cost allocation, the PMC will identify from among all Eligible Transmission Developers a developer that is granted the right to utilize the cost allocation given to that project. The criteria used to determine eligibility to utilize cost-allocations for projects selected for inclusion in the Regional Plan, as well as the process for selecting a transmission developer for those projects, are contained in the individual ETO Members' OATTs. Please reference the "Transmission Developer Qualification Criteria" section and the "Selection of a Transmission Developer for Sponsored or Unsponsored Projects" section in one of the TO Members' OATT Transmission Planning Attachments. The current version of each ETO Member's Order 1000 Planning Attachment to its OATT is located on its Open Access Same-Time Information System (OASIS) website. Links to those websites are listed in Appendix C.

After making its determination in selecting a particular transmission developer for a specific transmission project selected in the Regional Plan for purposes of cost allocation, the PMC will post to the WestConnect website within 60 days a document explaining (1) the reasons why a particular transmission developer was selected or not selected, and, if applicable, (2) the reasons why a transmission project failed to secure a transmission developer. If a sponsored or unsponsored project fails to secure a developer through the process described in the OATT attachments, the project will be removed from the Regional Plan.

#### 4.7.5 Development and Construction of Projects Identified in the Regional Plan

The WestConnect regional planning process is intended to identify the more efficient or cost effective transmission solutions for the region. After the Regional Plan is approved, the regional planning process will not obligate any entity to construct, nor obligate any entity to commit to construct, any facilities, regardless of whether such facilities are included in the Regional Plan. If projects identified in the Regional Plan are pursued for development, the PMC will not be responsible for serving as project developer for, or managing the development of, any project selected for inclusion in the Regional Plan. However, the development status of projects selected for inclusion in the Regional Plan will be monitored by the PMC to determine whether delays in the development of the project or changes in the project's definition, characteristics, or cost may require the Regional Plan to be reevaluated as more fully described in the subsequent section.

### 4.8 Regional Plan Reevaluation

Because of the inherent uncertainty associated with planning exercises, and in particular with regard to the data and assumptions used to identify needs and solutions to meet those needs, it is necessary to continuously reevaluate the Regional Plan and its project selections to ensure that the projects identified in the Regional Plan remain the more efficient or cost-effective solutions to regional transmission needs.

The Regional Plan and any project selected for inclusion in the Regional Plan for purposes of cost allocation are subject to reevaluation in each subsequent planning cycle according to the criteria below<sup>24</sup>. Conditions that trigger reevaluation include:

- The underlying project characteristics and/or regional or interregional needs change in the Regional Plan. Examples include but are not limited to: (a) a project's failure to secure a developer, or a developer's failure to maintain the qualifications necessary to utilize regional cost allocation; (b) a change (increase or decrease) in the identified beneficiaries of a project (which changes may occur through company acquisitions, dissolutions, or otherwise); (c) a change in the status of a large load that contributes to the need for a project; or (d) projects affected by a change in law or regulation;
- Projects that are delayed and projected to fail to meet their planned in-service date by more than two years. This includes projects delayed by funding, regulatory approval, contractual administration, legal proceedings (including arbitration), construction delays, or other delays;
- Projects with significant project changes including, but not limited to, kilovolt (kV), megavolt ampere (MVA), or path rating, number of circuits, number of transmission elements, or interconnection locations; and
- Projects with a change in the calculation of benefits or B/C ratio that may affect whether the project is selected for inclusion in the Regional Plan for purposes of cost allocation.
  - Example 1: Where an increase in the selected project's costs (including, but not limited to, material, labor, environmental mitigation, land acquisition, operations and maintenance, and mitigation for identified transmission system and region) causes the total project costs to increase above the level upon which the project was initially selected for inclusion in the Regional Plan for purposes of cost allocation, the inclusion of the regional project in the Regional Plan will be reevaluated to determine if the regional project continues to satisfy the region's B/C ratio and can be found to be a more efficient or cost-effective solution under current cost information.
  - Example 2: A selected project's benefits may include identification of a reliability benefit in the form of remedying a violation of a Reliability Standard. If the identified beneficiary implements improvements, such as a Remedial Action Scheme, to achieve reliability in compliance with the Reliability Standard at issue, inclusion of the regional project in the Regional Plan will be reevaluated to determine if the regional project continues to satisfy the region's B/C ratio and can be found to be a more efficient or cost-effective solution under current benefit information.
  - Example 3: Where a project's estimated benefits include benefits in the form of avoided costs (e.g., a regional project's ability to avoid a local project), and the project is not avoided, the inclusion of the regional project in the Regional Plan will be reevaluated to determine if the regional project continues to satisfy the region's B/C ratio and can be found to be a more efficient or cost-effective solution under current facts and circumstances.

Projects selected for purposes of cost allocation will continue to be reevaluated until all the following conditions have been met.

- State and federal approval processes completed and approved (including cost recovery approval under Section 205 of the Federal Power Act as applicable);

<sup>24</sup> Projects not subject to reevaluation are described at the end of Section 4.8.

- All local, state, and federal siting permits have been approved; and
- Major construction contracts have been issued.

When the Regional Plan is reevaluated as a result of any of the conditions triggering reevaluation addressed above, the PMC will determine if an evaluation of alternative transmission solutions is needed in order to meet an identified regional need. In doing so, the PMC will use the same processes and procedures it used in the identification of the original transmission solution to the regional need, except with updated models, scenarios, sensitivities and assumptions.

Projects not subject to reevaluation include, but are not limited to, the following:

- Local or single-system transmission projects that have been identified in individual ETO's TPL Reliability Standards compliance assessments to mitigate reliability issues and that have not been proposed (and selected by the PMC) for regional cost allocation; and
- Planned transmission system upgrades to existing facilities that have not been proposed (and selected by the PMC) for regional cost allocation.

Projects meeting any of the following criteria as of January 1, 2015 will also not be subject to reevaluation under the regional planning process:

- Projects of TOs who have signed the Planning Participation Agreement and that have received approval through local or state regulatory authorities or board approval;
- Local or single-system transmission projects that have been planned and submitted for inclusion in the Regional Plan or exist in the 10-year corporate capital project budgets; and
- Projects that are undergoing review through the WECC Project Coordination and Rating Review Process as of January 1, 2015.

## 4.9 Interregional Coordination

WestConnect will coordinate planning data and information with the other established Planning Regions in the Western Interconnection (i.e. California ISO and NorthernGrid) per the procedures outlined in Appendix D.

## 4.10 Disputes

Any disputes arising during any phase of the WestConnect regional transmission planning process will be addressed according to the procedures for dispute resolution as defined in the Agreement and in the Transmission Planning Attachments of the individual TO Members' OATTs.

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# Appendix A

## BPM Version Control

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Version No.	Affected Section Numbers or Description of Edits	Date Approved by WestConnect PMC	OATT Amendment Required (Y/N)	Date Implemented / Effective Date
1.0	all	February 17, 2016	N	February 17, 2016
2.0	4.1.1, 4.1.1.2	October 20, 2021	N	October 20, 2021
3.0	Removal of CTO structure and references to WECC TEPPC, and updates related to Interregional Coordination parties		Y	December 17, 2024

# Appendix B

## BPM Revision Process

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[Placeholder for BPM Change Request Process]

[The PMC is evaluating inclusion within this BPM of a defined process for requesting changes to the contents of the BPM. For the time being, and due to the continued refinement of the regional planning process, and the potential need for additional regulatory compliance filings, the PMC reserves its right to make changes to this BPM per its existing approval mechanisms.]



## Appendix C

### Links to ETO Member OATTs

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Please follow a link listed below to view the posted OATT for a specific WestConnect TO Member.

WestConnect TO Member	OASIS Link to Tariff
Arizona Public Service Company	<a href="https://www.oasis.oati.com/azps/">https://www.oasis.oati.com/azps/</a>
Black Hills Power, Inc.	<a href="https://www.oatioasis.com/BHBE">https://www.oatioasis.com/BHBE</a>
Black Hills Colorado Electric, LLC	<a href="https://www.oatioasis.com/bhct">https://www.oatioasis.com/bhct</a>
Cheyenne Light, Fuel, and Power Company	<a href="https://www.oatioasis.com/CLPT">https://www.oatioasis.com/CLPT</a>
Deseret Generation & Transmission Co-operative	<a href="https://www.oasis.oati.com/dgt">https://www.oasis.oati.com/dgt</a>
El Paso Electric Company	<a href="https://www.oatioasis.com/epe">https://www.oatioasis.com/epe</a>
Public Service Company of New Mexico	<a href="https://www.oatioasis.com/pnm">https://www.oatioasis.com/pnm</a>
Tri-State Generation and Transmission Association, Inc.	<a href="https://www.oasis.oati.com/tsgt">https://www.oasis.oati.com/tsgt</a>
Tucson Electric Power Company	<a href="https://www.oatioasis.com/tepc">https://www.oatioasis.com/tepc</a>
UNS Electric, Inc.	<a href="https://www.oatioasis.com/UNST">https://www.oatioasis.com/UNST</a>
Xcel Energy – Public Service Company of Colorado	<a href="https://www.oasis.oati.com/psco">https://www.oasis.oati.com/psco</a>

# Appendix D

## Interregional Transmission Planning Coordination Procedures

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### 1.0 Introduction

These Interregional Transmission Planning Coordination Procedures (IR Procedures) are intended to define the process by which an individual Planning Region can pursue the requirements of the “Western Interconnection – Order No. 1000 Interregional Compliance Filings” (“Common Tariff Language”), as formally accepted by the Federal Energy Regulatory Commission (“FERC”) on June 1, 2015. WestConnect has prepared these IR Procedures to define its internal activities for interregional coordination.

While these procedures were developed in collaboration with the other Western Planning Regions, these procedures are intended only to evidence WestConnect’s commitment to and process for coordinating its regional planning data and information with the other Western Planning Regions. As such, changes to these procedures will be subject only to the change processes of WestConnect. However, WestConnect will notify the other Western Planning Regions prior to making any changes to the procedures it intends to follow to facilitate IR coordination as outlined herein.

### 2.0 Interregional Coordination

The Western Planning Regions will coordinate planning data and information during their respective regional planning processes.

#### 2.1 Annual Interregional Coordination Meeting

WestConnect will host the Annual Interregional Coordination Meeting (Annual Meeting) in turn with the other Western Planning Regions, and will seek to convene such meeting in accordance with the timing requirements set forth in the Common Tariff Language. 2026NorthernGrid

A meeting notification will be issued by WestConnect no later than 45 calendar days prior to the meeting date. Details regarding the Annual Meeting, including the meeting agenda and presentations, will be made available on the WestConnect website no later than 7 days prior to the meeting. The host Region will be responsible for making available for distribution and posting by WestConnect a summary of all decisions and action items made during the Annual Meeting.

Prior to the Annual Meeting, the Western Planning Regions will meet to discuss an agenda, meeting logistics, and how shared information (e.g., ITP submissions, identified regional needs, other Annual Interregional Information) will be presented.

WestConnect will share the following regional planning data and information (Annual Interregional Information) no later than 21 days prior to the Annual Meeting.

**Table 1: WestConnect Annual Interregional Information**

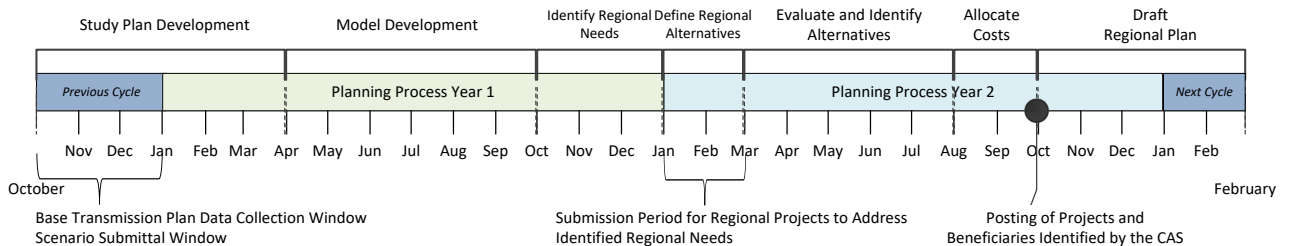
Year 1 Annual Interregional Information	Year 2 Annual Interregional Information
Current cycle Draft Regional Study Plan (includes identification of WECC base cases to be used, scenarios to be studied, and other underlying modeling assumptions)	Current cycle Regional Transmission Needs Assessment Report
Current cycle WestConnect Base Transmission Plan	List of any ITPs submitted during regional project submittal window
Previous cycle Regional Transmission Plan	

## 2.2 Planning Data and Information Exchange

WestConnect will share planning data and information with other Western Planning Regions at the times during its planning cycle that such information is made available for review and comment by others (i.e. stakeholders and other entities not participating in WestConnect activities). This includes, but is not limited to, study plans, regional reliability study results, economic and public policy assessments, project information, and the most recent regional transmission plans provided by the other Planning Regions.

### 2.2.1 WestConnect Interregional Coordination Milestones

WestConnect will seek to coordinate planning data and assumptions with the other Western Planning Regions as it executes its regional transmission planning process. A timeline of the WestConnect regional planning process is illustrated in Figure 4.

**Figure 4: WestConnect Regional Planning Timeline**

Specifically, WestConnect will share the following regional planning data and information with the other Western Planning Regions, subject to and consistent with WestConnect's processes and procedures for CEII and non-public data collection and sharing:

**Table 2: Regional Planning Data and Information WestConnect will share with the other Western Planning Regions**

Regional Planning Data or Information	Approximate Date of Availability
Draft Regional Study Plan	February, Year 1
Final Regional Study Plan	March, Year 1
Change case files used to modify WECC base cases to create the WestConnect regional powerflow model(s)	Q3

Alternate production cost data used to modify the WECC case to create the WestConnect regional production cost model	Q3
WestConnect Regional Transmission Needs Assessment Report	End Q4
List of ITPs submitted to WestConnect for evaluation	1 week following March 31, Year 1, and again at end Q5
Preliminary assessment of an ITP's benefits to WestConnect to determine cost assignment for regional evaluation purposes	TBD based on ITP evaluation process plan
Identification of any ITPs initially selected by WestConnect for inclusion in its Regional Transmission Plan for the purposes of cost allocation	Q7
Draft Regional Transmission Plan	Q8
Final Regional Transmission Plan	Q8 or Q1 next cycle

WestConnect will share its regional planning data and information in the normal course of conducting its regional planning activities by posting it to the WestConnect website or other designated location. WestConnect will further notify via email notice to the contacts identified in Planning Regions' Designated Communication Portals the availability of the listed information.

WestConnect will seek the following regional planning data and information from the other Western Planning Regions during the times within its regional planning cycle that such data can be usefully incorporated together with its own regional planning information in order to conduct its regional planning activities.

**Table 3: Regional Planning Data and Information WestConnect will seek from the other Western**

Regional Planning Data or Information	Approximate Date Needed
Firm-planned regional transmission projects	Q8 previous cycle
Base case modeling assumptions (e.g. planning horizon, WECC base cases to be used, resource assumptions for neighboring Regions)	Q8 previous cycle
Change case files used to modify WECC base cases in other Western Planning Regions	Q2
Results of system assessments indicating a reliability or congestion issue in the WestConnect region	When available
List of ITPs submitted to other Western Planning Regions for evaluation	1 week following March 31, Year 1
Identification of any relevant ITPs selected for the purposes of cost allocation in other relevant Regions	When available

WestConnect will request the information outlined in Table 4 via email notice to the contacts identified in Planning Regions' Designated Communication Portals.

## 2.3 Communication among the Planning Regions

At the occurrence of an event giving rise to the need to receive feedback from other Planning Regions, WestConnect will provide the planning data or information to other Planning Regions by email or email notice to the contacts identified in Planning Regions' Designated Communication Portals. The transmittal to the other Planning Regions will identify:

- Whether a response is needed and the date the response is needed;

2. Where and how to access the planning data or information if it is located on the WestConnect website;
3. A request, if any, to schedule a meeting/webinar to discuss the information;
4. Contact information for specific individuals to receive the information if a response to other than the Planning Regions' is desired.

When receiving information or requests from other Planning Regions, WestConnect will respond within the timeframes stated in those requests. The Planning Region receiving the information will consider the responses in accordance with its regional planning process.

From time to time a meeting/webinar may be needed for a Planning Region to respond to information or requests from other Planning Regions if more than a written response is warranted. The Planning Region providing the response will be responsible for requesting a meeting/webinar and will make arrangements for and host any such meeting/webinar. Such meetings/webinars, if held, will be among the members of the Planning Regions as needed to fulfill the information or requests from other Planning Regions.

### 3.0 ITP Evaluation Process

No later than 7 days following the ITP submittal deadline of March 31 of an even numbered calendar year, WestConnect will notify the other Planning Regions through their Designated Communication Portals of all ITP proposals that have been received and will arrange for the coordination and joint evaluation of the ITP with those regions. Each Planning Region will evaluate the sufficiency of the ITP data submittal and will attempt to identify deficiencies in the submitted information according to its regional transmission planning process. WestConnect will participate in the coordinated ITP evaluation process until such time that WestConnect determines that the ITP has not been selected in WestConnect's regional plan as a more efficient or cost effective alternative. The joint evaluation of an ITP is considered to be the joint coordination of the regional planning processes that evaluate the ITP. The goal of the coordinated ITP evaluation process is to achieve consistent planning assumptions and technical data of an ITP to be used in the individual regional evaluations of an ITP.

The elements of such coordination are:

1. Select a lead region for the coordination efforts;
2. Develop and post an ITP evaluation process plan to include agreed to common study assumptions, data, methodologies, cost assumptions and a schedule for the regional evaluation and potential selection of an ITP, no later than 75 days following the ITP submittal notification deadline;
3. Meet as identified in the plan or as needed during the evaluation process.

## 4.0 Designated Communication Portals

The following have been designated by the Planning Regions as their designated communication portals.

Planning Region	Interregional Planning Web Page	Provide Information/Comment	Receive Planning Region Notifications & Information	Interregional Coordination Contact
California ISO	<a href="http://www.caiso.com/planning/Pages/InterregionalTransmissionPlanning/default.aspx">http://www.caiso.com/planning/Pages/InterregionalTransmissionPlanning/default.aspx</a>	<a href="mailto:Regionaltransmission@caiso.com">Regionaltransmission@caiso.com</a>	<a href="http://www.caiso.com/informed/Pages/Notifications/MarketNotices/MarketNoticesSubscriptionForm.aspx">http://www.caiso.com/informed/Pages/Notifications/MarketNotices/MarketNoticesSubscriptionForm.aspx</a>	Biju Gopi <a href="mailto:bgopi@caiso.com">bgopi@caiso.com</a> 916-351-4424
NorthernGrid	<a href="https://www.northerngrid.net/northerngrid/workgroups/4">https://www.northerngrid.net/northerngrid/workgroups/4</a> There is not a specific Attachment K requirement for an interregional transmission planning web page	<a href="mailto:NWPP_NorthernGrid_Staff@westernpowerpool.org">NWPP NorthernGrid Staff@westernpowerpool.org</a>	<a href="#">NorthernGrid</a>	Chelsea Loomis <a href="mailto:Chelsea.loomis@westernpowerpool.org">Chelsea.loomis@westernpowerpool.org</a> 503-445-1082
WestConnect	<a href="http://regplanning.westconnect.com/interregional_coordination.htm">http://regplanning.westconnect.com/interregional_coordination.htm</a>	<a href="mailto:info@WestConnect.com">info@WestConnect.com</a>	<a href="mailto:info@WestConnect.com">info@WestConnect.com</a>	Heidi Pacini <a href="mailto:Heidi@pacenergies.com">Heidi@pacenergies.com</a> (303) 229-9401

## 5.0 ITP Project Submittal Information (Even-Odd Year Regional Planning Cycle)

To be considered for joint evaluation coordination, a proponent of an Interregional Transmission Project (ITP) must submit its project to each Relevant Planning Region no later than March 31 of an even-numbered calendar year and in accordance with the project submittal requirements of each Relevant Planning Region. The following matrix is intended to provide guidance regarding the project submittal process for each of the Western Planning Regions. Questions regarding a Region's project submittal process should be directed to the Region's contact identified in the matrix.

	California ISO	NorthernGrid	WestConnect
<b>Project Submittal Window</b>	January 1, even year through March 31, even year	For consideration in the NorthernGrid planning process, both regional and interregional projects may be submitted during the first quarter of any even-numbered calendar.	A project submittal window will open following the Needs Identification phase of the planning cycle (i.e. in approximately Q5 of the planning cycle). However, project submittals will be accepted at any time through the conclusion of the submittal window.
<b>ITP Project Submittal Deadline</b>	March 31, even year	March 31, even year	March 31, even year
<b>Project Submittal Form</b>	<a href="http://www.caiso.com/planning/Pages/InterregionalTransmissionCoordination/default.aspx">http://www.caiso.com/planning/Pages/InterregionalTransmissionCoordination/default.aspx</a>	<a href="#">NG Data Submittal Form 2022-2023</a>	<a href="#">WestConnect Project Submittal Form</a>
<b>Return Submittal Forms to:</b>	<a href="mailto:itpsubmission@caiso.com">itpsubmission@caiso.com</a>	<a href="mailto:NWPP_NorthernGrid_Staff@westernpowerpool.org">NWPP NorthernGrid Staff@westernpowerpool.org</a>	<a href="mailto:info@WestConnect.com">info@WestConnect.com</a>

	California ISO	NorthernGrid	WestConnect
<b>Separate Deadlines and Form(s) for Projects Seeking Cost Allocation?</b>	No	Yes, <a href="#">Table B. Developer Qualification Data Requirements</a>	No
<b>Pre-Qualification Process for Developers Seeking Cost Allocation?</b>	No	Developers need to be Qualified in the first quarter of the Planning Cycle.	Yes (occurs in Q1 of even years); Separate process for selecting developers for projects selected by WestConnect for purposes of cost allocation
<b>Project Submittal Guidelines &amp; Other Information:</b>	None	ITP Proponents must submit <a href="#">Table A. Project Data Requirements</a>	<ul style="list-style-type: none"> <li>Project submitter must be a member of WestConnect.</li> <li>\$25k deposit is required to support the cost of relevant study work, subject to true-up (or down) based upon the actual cost of the study.</li> <li>These requirements must be met by the conclusion of the project submittal window (see above) if the project is to be evaluated to meet an identified regional need.</li> </ul>
<b>Method for Noticing Opening of Submittal Window:</b>	Standard Market Notice posted each even calendared year.	Email announcement; Announcement posted to <a href="#">NorthernGrid</a>	Email announcement; Announcement posted to <a href="http://www.WestConnect.com">www.WestConnect.com</a>
<b>Send Requests to Receive Planning Region Notifications to:</b>	<a href="http://www.caiso.com/informed/Pages/Notifications/Default.aspx">http://www.caiso.com/informed/Pages/Notifications/Default.aspx</a>	<a href="#">NorthernGrid-Information-Request-Form.docx (live.com)</a> , email <a href="mailto:NWPP_NorthernGrid_Staff@westernpowerpool.org">NWPP NorthernGrid Staff@westernpowerpool.org</a>	<a href="mailto:info@WestConnect.com">info@WestConnect.com</a>
<b>For Questions, Contact:</b>	Biju Gopi <a href="mailto:bgopi@caiso.com">bgopi@caiso.com</a> (916) 351-4424	<a href="mailto:NWPP_NorthernGrid_Staff@westernpowerpool.org">NWPP NorthernGrid Staff@westernpowerpool.org</a> ; 503.445.1074, extension 5	<a href="mailto:info@WestConnect.com">info@WestConnect.com</a>



## 6.0 Even-Odd Year Interregional Coordination and ITP Evaluation Milestones

Even-Odd Year Interregional Coordination and ITP Evaluation	
Milestone	Requirement
1. Distribute and post Meeting Notification to Stakeholders	45 days prior to Annual Coordination Meeting
2. Post and share Annual Interregional Information	21 days prior to Annual Coordination Meeting
3. Meet and discuss how shared information (regional needs) will be presented	After posting of the Annual Interregional Information and prior to posting the Annual Coordination Meeting materials
4. Post meeting agenda and presentation materials	7 days prior to the Annual Coordination Meeting
5. Annual Coordination Meeting	Timing as required by Common Tariff Language
6. ITP Submittal Deadline	The common ITP submittal deadline for all Regions is no later than March 31 of every even numbered calendar year
7. Review ITP submittals for compliance and notify other Planning Regions of all ITP proposals that have been submitted	No later than 7 days following the ITP submittal deadline of March 31 of an even numbered calendar year
8. Resolve ITP data submittal deficiencies, if any	Each region will follow its regional process and notify the other planning regions if deficiencies are not resolved
9. Develop and post an ITP evaluation process plan, including agreed to common study assumptions, data, methodologies, cost assumptions and a schedule for determining the selection of an ITP	No later than 75 days following the ITP submittal deadline
10. Ongoing coordination of planning data and assumptions, including potential ITP benefits	Per milestones developed and posted in the ITP Evaluation Process Plan, but no later than December 31 of each odd number calendar year.
11. Final determination of ITP selection <sup>i</sup>	Per the ITP Evaluation Process Plan, but no later than December 31 of each odd numbered calendar year

<sup>i</sup> Depending on each regional process, the completion of ITP determination may go beyond this date due to various factors such as reevaluation process