



**Western Planning Regions (WPRs)
Interregional Coordination Meeting**

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Comments on Interregional Coordination Meeting

PG&E appreciates this opportunity to provide comments in response to the topics discussed in the Interregional Coordination Meeting on February 25, 2016. PG&E believes that the first Interregional Coordination Meeting was successful in setting the stage and meeting the objectives of information sharing among Western Planning Regions (WPRs), Western Electricity Coordinating Council (WECC), Participating Transmission Owners (PTOs), and Transmission Project Developers. PG&E commends the WPRs for taking the first step towards the development of an effective Interregional Coordination Process.

PG&E understands that this process is expected to evolve with lessons learned over various planning cycles. However, the lack of clarity on joint Interregional Transmission Project (ITP) evaluation and cost allocation can potentially hinder the coordination efforts. PG&E believes that the following gaps should be addressed to ensure that the ITPs submitted in this planning cycle are not subject to a disadvantage due to the lack of a well-established process:

1. Each WPR uses a different methodology to evaluate economic-based ITPs. Based on the current coordination process, the ITPs that provide benefits to multiple WPRs will be assessed using each Relevant Planning Region's (RPR's) evaluation methodology. This will create an inconsistent comparison of benefits and could potentially result in unfair cost allocation. RPRs should consider selecting an agreed upon evaluation methodology for joint evaluation of economic projects.
2. Based on the current coordination process, the ITP must be submitted to each RPR and evaluated through the separate planning processes of each RPR. The timeline for these processes is not presently aligned. For example, CAISO's Transmission Planning Process (TPP) is annual and does not align with WestConnect, Northern Tier Transmission Group (NTTG), or Columbia Grid's (CG) biennial TPP. If an ITP were found needed in CAISO's 2016-17 TPP, it would not be able to move forward until the following year (i.e. 2018). In addition



to requiring re-assessment of economic benefits, this could also impact the schedule, especially if the ITP is replacing a previously approved reliability project.

3. PG&E supports development of the Anchor Case with strong coordination of WPR's through the WECC processes that would provide a consistent and vetted western inter-connection wide dataset to support the inter-regional coordination efforts.

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