

March 25, 2026

Dennis Vermillion, CEO, Avista

Lisa Grow, President and CEO, Idaho Power

Darin Carroll, CEO, PacifiCorp

Maria Pope, President and CEO, Portland General Electric

Mary Kipp, President and CEO, Puget Sound Energy

Brian Bird, President and CEO, Northwestern Energy

Brandon Barkhuff, President and CEO, NV Energy

Dear NorthernGrid Enrolled Parties:

On behalf of the Relevant State Entities (RSEs) from the states that comprise the NorthernGrid transmission planning region,<sup>1</sup> the Committee on Regional Electric Power Cooperation's (CREPC's) 1920 Ad Hoc Committee<sup>2</sup> submits these comments with regard to the transmission planning and project selection provisions contained in the draft version of NorthernGrid's Attachment K<sup>3</sup> Template tariff language, which the NorthernGrid FERC-jurisdictional transmission providers (the "Enrolled Parties") intend to file with the Federal Energy Regulatory Commission (FERC) in compliance with FERC Orders No. 1920. 1920-A, and 1920-B<sup>4</sup> (Order No. 1920).<sup>5</sup>

### **Background**

FERC Order No. 1920 requires transmission providers subject to FERC jurisdiction to conduct long-term transmission planning in each transmission planning region.

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<sup>1</sup> California Energy Commission; California Public Utilities Commission; Idaho Governor's Office of Energy and Mineral Resources; Idaho Public Utilities Commission; Montana Department of Environmental Quality; Montana Public Service Commission; Public Utilities Commission of Nevada; Oregon Department of Energy; Oregon Public Utility Commission; Utah Department of Commerce; Utah Office of Energy Development; Utah Public Service Commission; Washington Department of Commerce; Washington Energy Facility Site Evaluation Council; Washington Utilities and Transportation Commission; Wyoming Department of Environmental Quality/Industrial Siting Council; Wyoming Energy Authority; Wyoming Office of Consumer Advocate; Wyoming Public Service Commission

<sup>2</sup> CREPC formed the 1920 Ad Hoc Committee to help facilitate the RSEs participation in discussions with NorthernGrid and WestConnect and their transmission provider members in advance of the transmission providers' submissions of their Order No. 1920 compliance plans to FERC. The Committee consists of representatives from each of the RSEs in both planning regions.

<sup>3</sup> NorthernGrid Attachment K Template – Transmission Planning Process ("Attachment K Template").

<sup>4</sup> 187 FERC ¶ 61, 068 (2024) ("Order No. 1920"); 189 FERC ¶ 61,126 (2024) ("Order No. 1920-A"); 191 FERC ¶ 61,026 (2025) ("Order No. 1920-B").

<sup>5</sup> This letter does not address ongoing cost allocation discussions RSEs continue to have through the Ad Hoc Committee with NorthernGrid and its Enrolled Parties. Comments addressing cost allocation proposals may be submitted separately at a future date.

Transmission providers in a region (through their regional planning entities) during a transmission planning cycle must develop at least three long-term scenarios (including a sensitivity for each scenario) derived from at least seven factors<sup>6</sup> identified by FERC. The planning region must also consider transmission projects and alternatives that address long-term regional transmission needs and assess the positive attributes of each potential project by evaluating at least seven identified benefits.<sup>7</sup> The transmission planning region then will determine whether to select any of the identified transmission projects or alternatives for development.

Recognizing that the states play a critical role in the evaluation, development, and siting of transmission facilities (including regionally planned projects), Order No. 1920 provides RSEs (state utility regulators and state agencies that have transmission siting responsibility) with several opportunities to offer meaningful input to transmission providers and the planning regions both before the transmission providers submit their compliance plans to FERC as well as throughout the transmission planning cycle.

For instance:

- Transmission providers must provide RSEs a forum during a State Engagement Period to evaluate and provide input on the transmission providers' proposed *ex ante* cost allocation methodology for transmission projects selected for the purposes of cost allocation.<sup>8</sup> The RSEs can also choose during the State Engagement Period to propose their own *ex ante* cost allocation methodology, which transmission providers would have to submit to FERC as part of their compliance filings.<sup>9</sup>
- The RSEs also can choose to develop and propose their own State Agreement Process (enabling states to seek to develop an alternative cost allocation methodology for a particular project or projects after they are selected for the purposes of cost allocation)

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<sup>6</sup> FERC Order 1920 outlines the following seven factors: 1) Federal, state, local, and federally recognized Tribal laws affecting resource mix and demand; 2) Federal, state, local, and federally recognized Tribal laws on decarbonization and electrification; 3) State-approved utility integrated resource plans and load-serving entities' expected supply obligations; 4) Trends in fuel costs and in the cost, performance, and availability of generation, electric storage resources, and building and transportation electrification technologies; 5) Generator retirements; 6) Generator interconnection requests and withdrawals; 7) Utility commitments and federal, state, local, or federally recognized Tribal policy goals that affect long-term transmission needs. Order No. 1920 at P. 409.

<sup>7</sup> FERC Order 1920 lists the following seven benefits to consider in cost-benefit analysis of long-term transmission planning: 1) avoided or deferred reliability transmission facilities and aging infrastructure replacement; 2) reduced loss of load probability or reduced planning reserve margin; 3) production cost savings; 4) reduced transmission energy losses; 5) reduced congestion due to transmission outages; 6) mitigation of extreme weather events and unexpected system conditions; 7) capacity cost benefits from reduced peak energy losses. *Id.* at P. 720.

<sup>8</sup> *Id.* at P. 1357.

<sup>9</sup> Order No. 1920-A at P. 651.

and comment on any State Agreement Process proposed by the transmission providers.<sup>10</sup>

- The transmission providers must consider the input of RSEs during the transmission planning process, including consideration of the RSEs views of the impact state public policies will have on regional transmission needs.<sup>11</sup>
- Transmission providers (and the transmission planning region) must prepare and consider the results of a “reasonable number” of additional scenarios requested by the RSEs.<sup>12</sup>
- In addition, RSEs and other stakeholders will be able to provide input on other elements of the compliance plans submitted by each transmission provider, including the benefits that will be used to evaluate proposed solutions to needs identified during the transmission planning process and the process for selecting proposed projects for the purposes of cost allocation.

## **Discussion**

As a recent report prepared by the Western Transmission Expansion Coalition (WestTEC) notes, the Western Interconnect will require a substantial amount of additional high voltage transmission capacity over the next ten years to reliably keep up with projected load growth.<sup>13</sup> Although many of these projects are in the planning and development stages, WestTEC identified 32 additional projects that will be needed by 2035.<sup>14</sup> WestTEC is also expected to release an additional report towards the end of this year that identifies the region’s needs over the next 20 years, which will undoubtedly recommend further additions of transmission capacity in the West.

Western states, including those located in the NorthernGrid planning region, have a strong interest in ensuring that the transmission grid is sufficiently robust to maintain reliability and enable utilities and their customers to access cost effective energy resources without overbuilding the transmission system. At the same time, we want to ensure that our residents and businesses do not overpay for the transmission system. That requires a transmission planning approach that effectively identifies transmission needs and ensures that the most efficient and cost-effective options are selected.

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<sup>10</sup> Order No. 1920 at PP. 1357-1358.

<sup>11</sup> Order No. 1920 at P. 904.

<sup>12</sup> Order No. 1920-A at PP.364-367.

<sup>13</sup> “West-Wide Transmission Study – 10-Year Horizon Report”, Western Transmission Expansion Coalition.

<sup>14</sup> *Id.* at Page 24.

With that in mind, the RSEs from NorthernGrid states submit the following comments on the transmission planning and project selection elements of the draft version of NorthernGrid's Attachment K Template.

***NorthernGrid Should Rely on the Seven Factors Listed in Order No. 1920***

FERC Order No. 1920 identifies seven factors that regional transmission planners should consider when creating the scenarios used during the planning process but also allows the planning regions to consider other factors. The RSEs believe that Order No. 1920's seven factors are appropriate for the purposes of scenario development, and we do not propose additional factors.

***Enhance Governance by Establishing a States Subcommittee***

The Enrolled Parties and States Committee has provided both states and the enrolled transmission owners an opportunity to interact with regard to NorthernGrid's transmission planning pursuant to FERC's Order No. 1000. This Committee may play an even more significant role in Order No. 1920 planning. Because the states will have more opportunities for input during the Order 1920 transmission planning process, we believe it would be beneficial to establish a Subcommittee to facilitate discussion among the NorthernGrid States to jointly develop feedback and proposals for the Enrolled Parties and States Committee to consider.

***Eliminate Second Step of the Project Selection Process***

NorthernGrid intends to propose a two-step process for determining whether to select for development for the purposes of cost allocation transmission projects identified during Order No. 1920 planning as addressing a transmission need. First, NorthernGrid proposes to quantify the benefits associated with each identified project by using the seven benefits laid-out in Order No. 1920. Those projects that meet or exceed a 1.25-1 benefits-to-cost ratio are then reexamined by taking into account only three of the seven FERC benefits (deferred costs, avoided capital costs, and increased available transfer capacity). Only projects that meet or exceed a 1.25-1 benefits-to-cost ratio under this second calculation are eligible for selection, although there is no requirement that any project actually be selected for development.

The RSEs object to this second step which eliminates from consideration important benefits associated with a potential project. Although FERC Order No. 1920 provides each transmission planning region with flexibility to determine the criteria to be used for project selection, the Commission was clear that a region using a benefits-to-cost ratio cannot

require a ratio higher than 1.25-1.<sup>15</sup> The NorthernGrid proposal would effectively establish a higher ratio by eliminating from consideration several potential benefits and thus unduly narrowing the projects that can be considered for development.

***Allow States and Other Stakeholders to Propose Transmission Projects and Other Potential Solutions***

NorthernGrid is proposing to allow both its enrolled transmission owners and non-incumbent transmission developers to propose transmission projects for consideration during the planning and selection process. Section 2.3.2.3 of NorthernGrid's draft Attachment K Template effectively removes any projects that do not have qualified developers or qualified sponsors from consideration or inclusion in the long-term transmission plan. The RSEs believe that other stakeholders, including the Relevant State Entities<sup>16</sup> and state transmission authorities<sup>17</sup>, should not be prohibited from proposing alternative (both transmission and non-transmission) projects that meet needs identified during the planning process for NorthernGrid to consider.

***Portfolio Planning Should Remain as an Option***

Although Order No. 1920 does not require regional transmission planning entities to engage in portfolio planning, it does not prohibit that approach either. Several other regions have, at times, planned and selected projects on a portfolio basis, which can have the benefit of ensuring that a wider swath in a planning region benefits from each planning cycle. However, it is also important to recognize that portfolio planning adds complexities, especially when it comes to ensuring that costs are allocated in a manner that is roughly commensurate with benefits.

NorthernGrid's current draft Attachment K Template does not prohibit NorthernGrid from deciding during each planning cycle to plan for and select project on a portfolio basis. RSEs encourage NorthernGrid to retain the flexibility to decide in the future whether to opt for portfolio planning during each planning cycle.

**Conclusion**

The RSEs appreciate the time that NorthernGrid and its jurisdictional providers have taken to meet with us as a group and, in some cases, individually during the State Engagement

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<sup>15</sup> Order No. 1920 at P. 958.

<sup>16</sup> Order No. 1920 defines Relevant State Entities as state utility regulators and state agencies that have transmission siting responsibility. Order No. 1920-B at P. 138.

<sup>17</sup> Several states in the Western Interconnect have created or are considering the creation of entities known as state transmission authorities, which are broadly designed to accelerate the planning, permitting, financing, and construction of high-voltage electric transmission lines, though specific authorities depend on state enabling legislation.

Period. Regional transmission planning and development has traditionally played a small role in facilitating infrastructure investments in the NorthernGrid region in the past. However, as load projections in the region grow and an aging grid faces an increasing number of challenges, regional transmission planning could play a more significant role in Western grid development going forward. The RSEs look forward to working closely with NorthernGrid and the transmission providers to ensure that the outcomes from long-term transmission planning benefit our citizens and businesses.

Thank you for considering our views.

Sincerely,

/s/ Tammy Cordova

Tammy Cordova  
Commissioner  
Public Utilities Commission  
of Nevada

/s/ Les Perkins

Les Perkins  
Commissioner  
Oregon Public Utility  
Commission

/s/ Brian Rybarik

Brian Rybarik  
Chair  
Washington Utilities and  
Transportation Commission

/s/ Dayn Hardie

Dayn Hardie  
Commissioner  
Idaho Public Utilities  
Commission

/s/ Chris Petrie

Chris Petrie  
Deputy Chairman  
Wyoming Public Service  
Commission

/s/ Darcie L. Houck

Darcie L. Houck  
Commissioner  
California Public Utilities  
Commission

/s/ Jeff Welborn

Jeff Welborn  
President  
Montana Public Service  
Commission

**Explanatory Addendum of John S. Harvey – Commissioner on the Public Service Commission of Utah to the 1920 Ad Hoc Committee’s letter to NorthernGrid dated March 25, 2026**

March 25, 2026

As Utah’s voting representative on the 1920 Ad Hoc Committee (“Committee”), with one exception, I support the recommendations and comments contained in the Committee’s letter to NorthernGrid dated March 25, 2026, addressing state preferences for NorthernGrid’s long-term transmission planning proposals. The one exception is with respect to the Committee’s recommendation regarding NorthernGrid’s 2-step selection process, I support NorthernGrid’s proposed two-step process.

Sincerely,

/s/ John S. Harvey, Ph.D.

John S. Harvey, Ph.D.

Commissioner

Public Service Commission of Utah