



Department of Energy

Western Area Power
Administration Sierra
Nevada Region
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Sent by electronic mail.

Ms. Chelsea Loomis
Chair, Reliability Assessment Committee (RAC)
Western Electricity Coordinating Council
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Dear Ms. Loomis,

The Western Area Power Administration – Sierra Nevada (WASN) region opposes the LS Power Grid California (LSPGC) request that the Collinsville 500/230 kV Substation Project (Project) is waived from the WECC Project Coordination Process.

The waiver request is made under the premise that “The Project was coordinated through the open stakeholder process under the CAISO transmission planning process (TPP)”, therefore, the appropriate transmission studies have been completed through an appropriate transmission planning forum, to meet the intended purpose of the criteria described in Section 4.2.f.i. of the WECC Project Coordination Process.

The CAISO TPP is a comprehensive evaluation of the CAISO transmission grid that identifies projects needed to support future reliability or needed to support California’s policy goals within the CAISO transmission system. It is common practice for Annual Transmission Planning Assessments and Annual Transmission Plans to focus on a Planning Coordinator (PC) or Transmission Planner’s (TP) transmission system, where projects identified through these studies are intended to support future reliability or policy needs for their system, as is appropriate to the scope of those studies.

However, separate studies are required to adequately rule out potential impacts that the project will cause on the operation of neighboring systems, even if no impacts were observed in the PC or TP’s Annual Transmission Planning Assessments. The WECC Project Coordination Process provides a forum where these studies can be efficiently performed. This process allows for the Project Sponsor and the neighboring entities to work together in a single study with a scope that is intended to identify or rule out the potential impacts caused by the project to neighboring systems and determine the most effective mitigation solutions for those impacts that might be identified.

WASN's objection to the Waiver of "Significant Impact" Status request does not imply opposition to the Project. Rather, WASN requests that the Project is entered into the WECC Project Coordination Process so that WASN and the other regional entities can work with LSPGC to ensure that all the necessary studies are performed to identify or rule out, the potential impacts caused by the Project. If the studies find that the Project causes adverse impacts on the neighboring systems, the WECC Project Coordination Process provides a forum where the most effective mitigation solution can be identified.

Sincerely,

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