



April 25, 2024

Chelsea Loomis

Co-Chair, Reliability Assessment Committee (RAC)

Western Electricity Reliability Council (WECC)

Sent via e-mail: [chelsea.loomis@northwestern.com](mailto:chelsea.loomis@northwestern.com)

**RE: LS Power Request for Waiver of “Significant Impact” Status for the Collinsville 500/230kV Substation project.**

Dear Ms. Loomis,

The Transmission Agency of Northern California (TANC) opposes the LS Power request for a waiver from the requirements specified in the WECC Project Coordination Process for the Collinsville 500/230 kV Substation Project.

As the Project Sponsor, LS Power has made the request for the waiver based on the premise that the *“project is not expected to have a significant impact on the operation of the Western Interconnection. The Project was coordinated through the open stakeholder process under the CAISO Transmission Planning Process (TPP). The Project is not directly connecting to or modifying any of the existing WECC paths.”* therefore, the appropriate transmission studies have been completed, through the appropriate transmission planning forum, to meet the intended purpose of the criteria described in Section 3.2.f.i. of the WECC Project Coordination Process.

TANC acknowledges that this project was identified as a policy need for the CAISO and is not in opposition to this project. However, additional studies are needed that were outside the scope of the CAISO Studies to address the potential impacts to the operation of the adjacent systems and impacts to Path 66 N-S and S-N transfer capability. For this reason, the CAISO studies are not sufficient to qualify on its own as coordinated transmission studies and “transmission planning forum” described in Section 3.2.f.i. of the WECC Project Coordination Process.

It is worth noting that the COTP is an affected system to the Collinsville 500/230 kV Substation Project. This is due to the planned integration of the project with the 500 kV system and the known impacts to Path 66 N-S transfer capability that still need to be resolved, and changes in short circuit fault duty values. TANC is confident that these concerns will be resolved, but the necessary studies to address these issues have yet to be initiated.

Also, there are additional studies that are needed to verify that the expected operation of this project will not adversely impact system performance during the activation of existing Remedial Action Scheme (RAS) and flows on Path 66. The project is expected to improve system reliability, but additional studies are needed to assess the risk of unintentional reactions occurring during the operation of existing RAS that might occur due to the integration of this project. These studies are outside the scope of the CAISO TPP but are expected to take place before the LS Power’s project is integrated into the 500 and 230 kV systems.

## LS Power Request for Waiver

The WECC Project Coordination Process “Promotes the reliable and coordinated integration of existing and new projects so that the use of the system is maximized for all participants.”<sup>1</sup> However, this formal process may not be needed if the project meets the conditions specified in Section 3 of the WECC Project Coordination Process and can demonstrate that there will not be any significant impacts to the operation of the Western Interconnection. Section 3.2.f provides two options on how a project might provide evidence that demonstrates how a project is not expected to significantly impact the operation of the Western Interconnection. These options are similar in that transmission studies coordinated through a transmission planning forum described in Section 3.2.f.i. are assumed to be able to answer the questions described in Section 3.2.f.ii. to demonstrate that the project is not expected to significantly impact the operation of the Western Interconnection. The example questions provided in the WECC Project Coordination Process for 3.2.f.ii. are as follows:

1. Are there any impacts to other systems—have studies demonstrated?
2. Is there any impact on flow of energy on other systems?
3. Are any WECC transfer paths affected?
4. Is a flow control device needed or required as a part of the project?
5. Is the project connected to other utilities systems?
6. Do disturbances affect other entities?

In the CAISO annual TPP, the reliability needs for the LS Power’s Collinsville 500/230 kV Substation Project were identified. However, as the project sponsor, LS Power is still required to work with the other Entities within the region so that comprehensive studies can be performed to demonstrate that the project will not have an adverse impact on the operation of the existing system or to define mitigation plans to resolve impacts identified on adjacent systems or WECC path transfers. As additional studies are needed for this project to assess the potential impacts to the system, TANC is of the view that the CAISO annual TPP cannot be used as the only study and only “transmission planning forum” to meet the intended criteria described in Section 3.2.f.i of the WECC Project Coordination Process.

For the reasons described in this letter, TANC requests that LS Power proceed with the WECC Project Coordination Process, as the Project Sponsor, for Collinsville 500/230 kV Substation Project. TANC is looking forward to working with LS Power in this process so that these projects can be successfully integrated into the system.

Sincerely,

DocuSigned by:  
  
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Jarom Zimmerman  
General Manager  
Transmission Agency of Northern California (TANC)

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<sup>1</sup> WECC Project Coordination, Path Rating, and Progress Report Processes, page 5, Bullet 6

## LS Power Request for Waiver

CC:

Augustin, Philip (Co-Chair WECC RAC)  
[philip.augustin@srpnet.com](mailto:philip.augustin@srpnet.com)

Thomas Carr (Chair WECC StS)  
[tcarr@westernenergyboard.com](mailto:tcarr@westernenergyboard.com)

Doug Tucker (WECC)  
[dtucker@wecc.org](mailto:dtucker@wecc.org)

Ross Hohlt (LS Power)  
[rhohlt@lspower.com](mailto:rhohlt@lspower.com)

Mark Millburn (LS Power)  
[MMilburn@lspower.com](mailto:MMilburn@lspower.com)

Marco Rios (PG&E)  
[M1R9@pge.com](mailto:M1R9@pge.com)

Patrick Won (PG&E)  
[P1WE@pge.com](mailto:P1WE@pge.com)

Shengen Shao (PG&E)  
[SQS5@pge.com](mailto:SQS5@pge.com)

Satvir Nagra (PG&E)  
[SXS5@pge.com](mailto:SXS5@pge.com)

Jeffrey Billinton (CAISO)  
[jbillinton@caiso.com](mailto:jbillinton@caiso.com)

Bryan Griess (WAPA)  
[Griess@wapa.gov](mailto:Griess@wapa.gov)

Gary Farmer (WAPA)  
[Farmer@wapa.gov](mailto:Farmer@wapa.gov)

Larry Riegle (TANC)  
[Lriegle@tanc.us](mailto:Lriegle@tanc.us)