



Department of Energy

Western Area Power
Administration Sierra
Nevada Region
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Co-Chair, Reliability Assessment Committee (RAC)
Western Electricity Reliability Council (WECC)

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Doug Tucker
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Layne Maxfield, Tyler Meroth, and Alexander Ford
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NV Energy (NVE)

Sent via e-mail: chelsea.loomis@westernpowerpool.org; philip.augustin@srpnet.com;
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RE: NV Energy Request for Waiver of “Significant Impact” Status for the Shaffer Substation – LMUD Interconnection project.

Dear Ms. Loomis, and others

The Western Area Power Administration – Sierra Nevada Region (WASN) opposes the NV Energy request for a waiver from the requirements specified in the WECC Project Coordination Process for the Shaffer Substation – LMUD Interconnection.

The waiver request was made under the premise that “The Project was coordinated through the open stakeholder process under the CAISO transmission planning process (TPP)”, and NVE TPL, 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 I.4.2.f.i. of the WECC Project Coordination Process.

To identify, or rule out potential impacts to the WASN Transmission System, Path 66 N-S and S-N transfer capability, and impact to the Northeast to Southeast Separation Scheme, WASN requested the following additional information:

1. Will the project be simultaneously connected to the NVE system (@ Shaffer 345kV Sub) and the PG&E system (@ Westwood 60kV Sub).
2. Will there be a RAS that will automatically disconnect the LMUD system to the NVE or PG&E system due to a thermal overload and frequency deviation?
3. Will either the PG&E/LMUD or NVE/LMUD ties be included in the WECC-1 RAS?

Given the request above was unanswered, WASN therefore opposes the NV Energy request for a waiver in hopes to participate in the WECC Project Coordination Process to provide a forum where studies can be performed, and the Project Sponsor along with regional entities can work together to identify the most effective mitigation solution (if needed) or to rule out potential operational concerns that might be caused by the project on the neighboring system.

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 NVE 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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