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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 Transmission Agency of Northern California (TANC) 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 Project Sponsor, NV Energy, 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.”* However, the Project is directly connecting and modifying the existing WECC Path 76 – Alturas Project. In addition, the Project will serve as a new intertie between NV Energy and the CAISO/PG&E transmission systems.

TANC acknowledges that this project was identified as a reliability need for LMUD and is not in opposition to this project. However, additional studies are needed that were outside the scope of the CAISO or NVE 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 in addition to impacts regarding the Northeast – Southeast Separation scheme.

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Also, additional studies are needed to verify that the expected operation of this project will not adversely impact system performance during the activation of existing 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 or NVE TPL studies but are expected to take place before the NVE's project is integrated into Alturas Project. For these reasons, the CAISO or NVE 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

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."¹ 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 Transmission LMUD studies, the reliability needs for the Shaffer Substation – LMUD Interconnection Project were identified. However, as the project sponsor, NVE 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 Transmission LMUD studies 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 NVE proceed with the WECC Project Coordination Process, as the Project Sponsor, for Shaffer Substation – LMUD Interconnection Project. TANC is looking forward to working with NVE in this process so that these projects can be successfully integrated into the system.

¹ WECC Project Coordination, Path Rating, and Progress Report Processes, page 5, Bullet 6.

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Sincerely,

Tim Schiermeyer
Transmission Agency of Northern California (TANC)

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