

The States appreciate the opportunity to provide comments on NorthernGrid's first Draft Study Scope. We commend the authors and analysts for accomplishing this task in the midst of an unprecedented global pandemic.

In NorthernGrid lies a unique opportunity to create a forum where States and Members can mutually benefit from engagement with each other. Through working together, the States can provide valuable insights to the extent that Members invite engagement with States through both technical education and higher-level discussion. While all State representatives may not all become technical experts, they can still provide relevant perspective. We are looking forward to working with Members in this capacity. In the coming months, we expect to refine communication processes for a productive workflow.

NorthernGrid is a new forum that will allow for more informed policy guidance and a robust understanding of regional transmission. The Study Scope will serve as a tool to help inform regional thinking about transmission planning. In the future, the following initiatives could allow for productive participation:

- Technical workshops that start with basics;
- Advanced technical workshops that provide additional insight into assumptions and analysis;
- Public policy workshops that provide opportunities for discussions about priority issues in different states;
- Where feasible, incorporating additional case study scenarios; and
- Opportunities to inject sensitivity studies based on existing scenarios, but focused on a particular question or interest

Although the current schedule for this initial round of planning makes participation and engagement difficult, individual states have begun to articulate recommendations and areas for discussion within the Study Scope. These include the following (which have been raised by at least one state but have not yet been discussed among the States): absence of cost allocation and cost-benefit analysis from study plan; need for load forecast update in light of COVID-19 pandemic and economic disruption; use of historic weather and temperature data unadjusted for projections of global warming effects; lack of data reflecting some state policies; lack of sychnronization with IRP time-frames; and storage modeling. We look forward to further engagement among States and with Members on these issues.

We appreciate the opportunity to share these comments and look forward to collaboration and strengthened communication in the future.

Respectfully submitted,

Nadine Hanhan – Co-Chair, on behalf of State participants

NorthernGrid Enrolled Parties and States Committee

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