



November 13, 2023

There is an existing Interregional Transfer Capability Study (ITCS) underway. NERC has provided the framework for the study here: [ITCS Framework \(nerc.com\)](https://www.nerc.com/ITCS-Framework) and is requesting comments by November 17, 2023.

In response to the call for comments regarding the ITCS effort, NorthernGrid members unanimously submit the following:

Regarding Resource Retirements:

“NorthernGrid does support the accounting for and modeling of planned retirements in the ITCS as per submitted IRPs and/or state policies.”

Regarding Resource Additions:

NorthernGrid does not support the identification and translation of utility-specific IRPs into the base cases used for the ITCS and supports using resources placed in the ADS.

Regarding Topology Considerations:

NorthernGrid supports the inclusion of Regional transmission projects that have been selected into RTPs or can provide reasonable demonstration that their project will be online in 2032 should be included in the ITCS.