

The States appreciate the opportunity to provide comments on NorthernGrid's first Draft Regional Plan. We appreciate the extensive work of the authors and analysts in accomplishing the task of identifying projects that would meet the needs of the NorthernGrid members in a 10-year future. Below we provide broad observations on the Draft Plan. Attached to these general comments is also a spreadsheet of questions, technical requests, and other suggestions.

As an outcome of the report, NorthernGrid identified a series of projects, named the Baseline Member Projects (BLMP) that would most cost-effectively meet reliability needs under a series of stresses and planning assumptions. However, while the Draft Regional Plan is adequate in providing answers to fundamental study questions, the States recommend that the Draft Regional Plan provide supplementary exposition in several key areas:

- **Policy Considerations.** While the Draft Regional Plan provides a transmission planning result, it is unclear how it does or does not account for recently adopted state policies and laws. The Regional Plan should include a discussion of how it has or has not addressed the changing policy landscape, and why.
- **Scoping and Project Selection.** The Regional Plan should include an accessible, but more detailed description of why certain transmission projects were selected for consideration in the plan as opposed to others. The States are interested in knowing what sorts of difficulties were left for individual members to solve, and what sorts of projects were considered more appropriate for regional study.
- **Stresses.** There should be additional context in the plan about each area of electrical interest, and why each stress was selected. If these are legacy scenarios from previous plans or known areas of interest among planners, these should be clarified for non-technical regulatory and general audiences.
- **Major Changes.** The plan should include an account of key differences between past and present regional plans. For example, acknowledgment of the significant milestone combining Northern Tier Transmission Group and ColumbiaGrid is absent from the report. There is also a lack of discussion about any load changes observed as a result of the Covid-19 pandemic, and how this has or has not impacted regional transmission planning.
- **Comparisons.** The Draft Regional Plan does not provide cost details, though it does indicate that the BLMP is the most cost effective combination of resources. The States are interested in a high-level cost comparison among all the cases considered, in addition to some additional exposition about why non-incumbent projects were rejected. Further, sufficient narrative should be provided such that FERC can readily see that independent initiatives were appropriately part of the review process and give proper consideration.

As stated in our draft scope comments, in NorthernGrid lies a unique opportunity to create a forum where States and Members can mutually benefit from engagement with each other. The States look forward to proactive discussions on how to inform the Study Scope for the 2022-2023 planning cycle in order to



approach matters of state concern and interest. 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
August 18, 2021

