
Preparing for the Council's Ninth Power Plan

March 2024



Northwest **Power** and
Conservation Council

Overview

The Northwest Power and Conservation Council (the Council) is responsible for developing a regional electric power and conservation plan. This plan provides recommendations to the Bonneville Power Administration and the region at large on the acquisition of new energy resources. The Council adopted its current power plan, the 2021 Power Plan, in February 2022. It is now starting to prepare for the next plan, which will be the ninth power plan. The Council will officially kick off the power plan review in early 2025, after the start of the Council's Fish and Wildlife Program Amendment process. The Council is striving to complete the power plan by the end of 2026 or early 2027.

Between now and the official kickoff next year, the Council's power planning division is scoping out the potential questions to be explored preparing methodologies, draft inputs, and models. This early scoping and preparation will streamline the power plan development process. The Council is seeking stakeholder comment for an approximately 45-day period (ending on April 26, 2024) on the concepts outlined in this paper.

The Council is specifically seeking comments on the proposed scenarios to understand the region's priorities. Scenario modeling will seek to explore areas of risk and uncertainty in the future power system. The Council is currently considering the following scenarios:

- **Resource and Transmission Risk:** Exploring how changing resource costs and availability, including that of emerging resources and changing transmission options, will impact resource decisions. Because it will not be possible to explore every possible iteration of risk and uncertainty, the Council is interested in comments on priority questions to be explored.
- **West-Wide Decarbonization Policy:** Exploring potential implications for Northwest resource decisions should there be wide-scale policies or drivers towards decarbonization that significantly increase loads and require carbon-free resources. The Council is specifically interested in comments on priorities to help scope this potential scenario.
- **Operational Flexibility:** Exploring resource decisions after leveraging or limiting various resources' ability to support operational flexibility to integrate renewables. This may include exploring the trade-offs and limitations of flexibility with the

hydro system, existing thermal resources, and new resources, such as storage. The Council welcomes feedback on priority questions to be explored.

- **Extreme Weather Stress Testing:** Exploring the impacts of extreme weather events. The Council will be using climate change informed data for loads and resources, which will already reflect extreme weather in the modeling of other scenarios. This potential scenario would further stress test the system under more frequent extreme weather events.

The Council is interested in comments on each of these proposed scenarios, as well as other potential risks and uncertainties that may be a priority for the region. The Council will consider comments received as it refines the plan scope and continues to prepare models and data. This early scoping will support the Council in meeting its timeline goals, although the Council recognizes that it will need to remain flexible throughout the process to address important changes and questions that arise.

Background

Since its inception in 1980, the Council has developed eight power plans and is now starting to prepare for its ninth. This section provides background on the Council's power planning responsibilities as defined by the Northwest Power Act. It also outlines the general analytical approach to power planning.

Northwest Power Act

The Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act) of 1980 authorized the states of Washington, Oregon, Idaho, and Montana to form an interstate compact agency—the Council—and directed it to prepare a regional power plan, prepare and periodically amend a fish and wildlife program prior to each power plan, and develop both products in a highly public process. In doing this work, the Northwest Power Act establishes a clear set of purposes for the Council:

- Encourage conservation and the development of renewable resources¹
- Ensure an adequate, efficient, economical, and reliable power supply²

¹ Northwest Power Act, Section 2(1).

² Ibid, Section 2(2).

- Provide for the participation of states, local governments, consumers, utilities, fish and wildlife agencies, Tribes, and the public³
- Protect, mitigate, and enhance fish and wildlife resources.⁴

In developing a power plan, the Council should give priority to cost-effective resources, with conservation given the highest priority, followed by renewables, then generating resources utilizing waste heat or with high efficiency, finally followed by all other resources.⁵ With these priorities in mind the Council's plan should include a "scheme for implementing conservation measures and developing resources [pursuant to Section 6 of the Act] ... to reduce or meet the Administrator's [Bonneville's] obligations." This scheme must be developed with "due consideration for" environmental quality, compatibility with the existing power system, fish and wildlife protection and mitigation, and other criteria set forth in the plan.⁶

Section 4(e)(3) of the Northwest Power Act outlines specific elements that should be included in the Council's power plan, including:

- Council's Fish and Wildlife Program
- Energy conservation program and model conservation standards
- Demand forecast of at least 20 years
- Forecast of power resources estimated to meet Bonneville's obligation
- Analysis of reserve and reliability requirements, including cost-effective methods for providing reserves to ensure adequacy
- Methodology for determining quantifiable environmental costs and benefits
- Recommendations for research and development
- Methodology for calculating a surcharge (as related to the model conservation standards).

The Council's power plan is focused on guiding the acquisition of new resources to meet the region's energy needs. The only legal requirement connected to resource

³ Ibid, Section 2(3).

⁴ Ibid, Section 2(3)(a) and Section 2(6).

⁵ Ibid, Section 4(e)(1). Cost-effective is defined in the Act in Section 3(4)(A), and a resource is cost-effective if it has an "estimated incremental system cost no greater than that of the least-cost similarly reliable and available alternative measure or resource, or any combination thereof." Therefore, cost-effectiveness is a comparative exercise of resources.

⁶ Ibid, Section 4(e)(2).

acquisition is with Bonneville. Sections 4(d)(2) and 6(a), 6(b), and 6(c), of the Northwest Power Act require Bonneville’s implementation of conservation and acquisition of new resources to be consistent with the Council’s power plan, with certain narrow exceptions. In addition, the State of Washington’s Energy Independence Act tied Washington utilities’ conservation potential directly to the Council’s methodology for conservation. The Council’s power plan is also an influential resource for other entities making resource decisions, including legislators, regulators, and state energy offices around the region. The Council’s power plan continues to be an important means for examining the potential implications of policy decisions on the regional system, and how to plan and manage this system in the face of uncertainty.

Developing a Power Plan

One of the primary objectives of the Council’s power planning analysis is to identify recommendations for new, cost-effective resources that will best meet future electricity needs while integrating those into the existing system. Figure 1 outlines the general power plan analytical process.

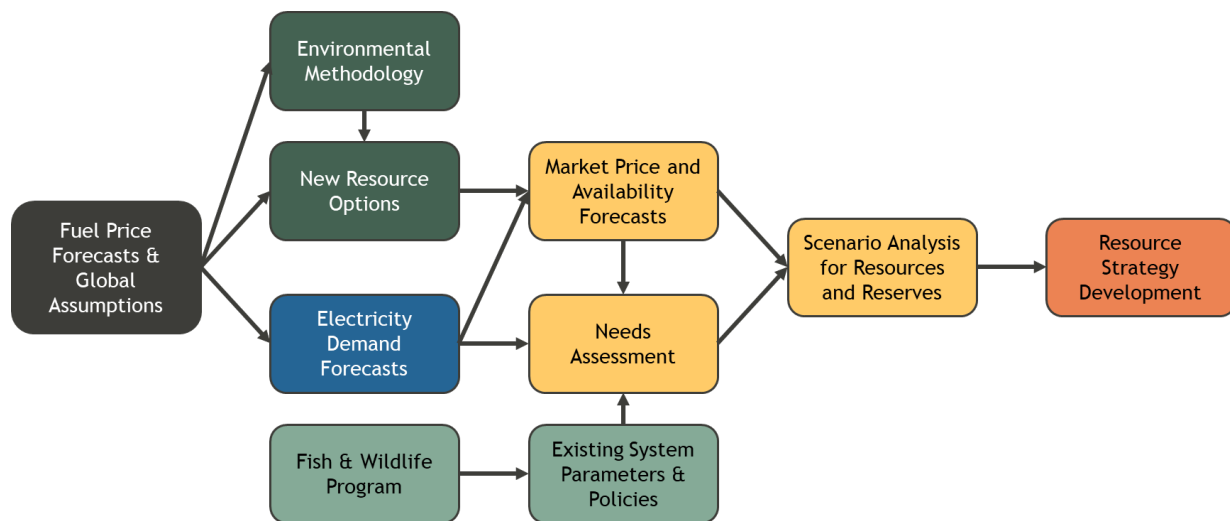


Figure 1: Power Plan Development Process

One of the first steps in this process is defining the capabilities of the existing system. This includes capturing any expected changes that may be forthcoming, based on announcements from plant owners or policy requirements. It also factors in any changes to river operations in the Columbia River Basin to account for fish and wildlife requirements defined in the Council’s Fish and Wildlife Program.

The next element is to forecast future electric loads. To best capture different load trajectories as well as uncertainty regarding the pace of load growth, the Council typically develops multiple load forecast ranges. After completing a forecast of existing system capabilities and the future load projections, the Council can then determine how to meet future electricity needs with new resources.

The Council develops a suite of new resource options, including a mix of supply and demand side resources. This mix of reference plants and supply curves capture important attributes to the resources, including energy amount, timing, and costs. As part of this, the Council must develop a methodology for determining quantifiable costs and benefits for resources. When applying this methodology, the Council seeks to ensure symmetry across measures and resources to avoid biasing a specific resource.

Once the Council has defined the existing system, forecasted loads, and developed a set of new resource option inputs, scenario modeling can begin. The Council will develop a forecast of WECC-wide market availability and prices and assess needs as defined by the Council's adequacy metrics. This information, along with the inputs, will then inform the scenario analysis that explores a range of potential future risks and policy questions.

Planning Under Uncertainty

Uncertainty is inherent to the Council's power planning process. Every step in the analytical process carries unknowns. New policies, different decisions by resource owners, or new or amended requirements in future Fish and Wildlife programs could result in significant changes to the capabilities of the region's existing power system. This uncertainty also extends to future load forecasts, whose trajectories can shift due to changing policies, economic conditions, or other factors. The cost of new resource options can fluctuate, particularly for those just emerging on the market. The availability and rollout of these resources can be vastly different than anticipated today. To explore and address these uncertainties as best as possible, the Council uses scenario analysis. When taken collectively, the scenarios inform a robust set of recommendations that will guide planning decisions in the face of ambiguity and rapid change that's occurring in the power system.

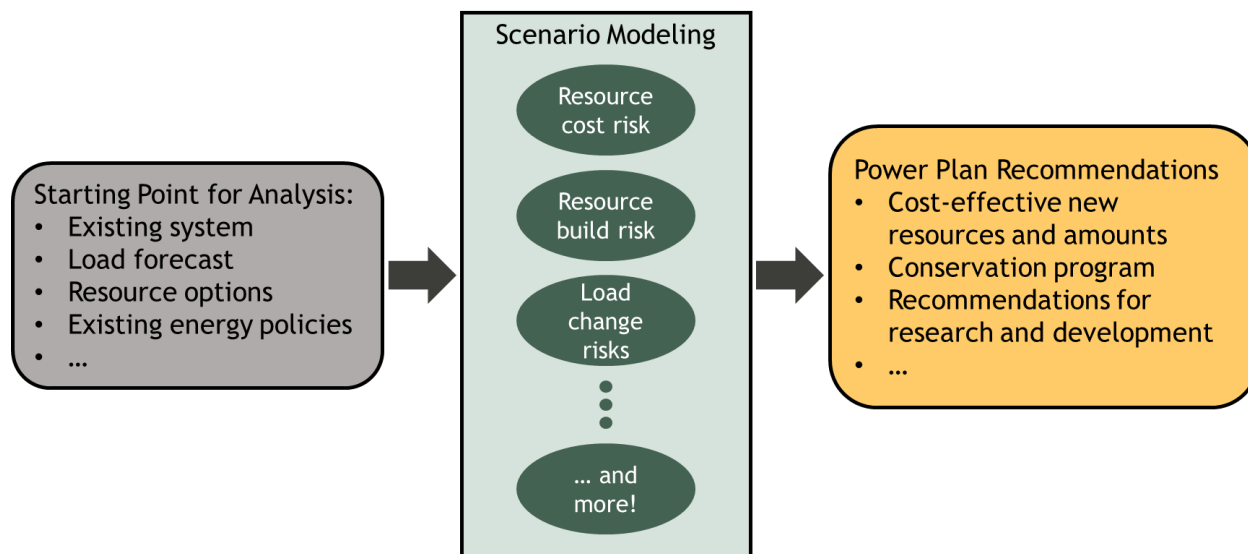


Figure 2: Scenario Modeling Approach

Before scenario modeling can begin, the Council must develop a common set of assumptions and inputs from which it can test different risks and uncertainties. For the ninth plan, the Council is using the frame of a “starting point”. The starting point will represent the Council’s understanding of the existing system and resource options based on the best available data at the time of modeling.⁷ The Council will then use scenario analysis to adjust these assumptions as a means of exploring uncertainty and testing risks. The goal will be to develop a robust, yet well-defined, suite of scenarios that focus on the most critical risks and uncertainties facing the power system ahead. Once the scenario analysis is complete, the Council will consider all the modeling results, as well as any other related studies, to develop a set of recommendations and resource strategy. No one scenario or modeling result will form the basis of this strategy. Rather, the Council will use the collective insights gleaned from all the analysis to develop its final recommendations.

⁷ The Council’s starting point is explicitly not intended to reflect an expected case or reference case from which to compare all other results. It is simply a means of aligning assumptions based on known factors in order to explore the risks from the unknown factors through the scenario modeling.

Proposed Focus of the Council's Ninth Power Plan

The following section outlines the Council's early thinking on potential scope for its ninth power plan. The Council is seeking broad regional input on this proposed framing, which the Council will use to refine the scope.

Timeline

The Northwest Power Act requires that each power plan be reviewed by the Council at least every five years.⁸ It further requires the Council to call for recommendations to amend the Fish and Wildlife Program⁹ prior to the review of the plan, and for the Fish and Wildlife Program Amendment to be completed and adopted prior to the power plan.¹⁰ The Fish and Wildlife Program Amendment is included in the subsequent power plan.

The Council is planning to start its review of the plan in early 2025 with a goal of final adoption by the end of 2026 or early 2027. This timeframe is well within the five-year review cycle and aligns nicely with the Council's Fish and Wildlife Program Amendment process, which is anticipated to start at the beginning of 2025 and is projected to conclude in spring or early summer of 2026.

For the remainder of 2024, the Council's power division is preparing for the plan review process. In addition to scoping out modeling questions and related methodologies, staff will start preparing plan inputs. This includes starting to prepare the load forecasts that will be used in modeling, as well as new resource options. The power division aims to have a draft set of resource options prepared by late 2024, which will be used to support testing and refinement of the modeling tools. The division will also be working on its proposed environmental methodology, an important early input to developing the resource supply curves and reference plants.

⁸ Northwest Power Act, Section 4(d)(1).

⁹ Ibid, Section 4(h)(2).

¹⁰ Ibid, Section 4(e)(3)(F).

In 2025, the Council will officially start the review of the power plan. At this point, the power division will finalize inputs and transition to modeling electricity market prices and conducting a needs assessment. These will feed into the scenario modeling, which the Council anticipates starting in mid-2025 and concluding in early 2026. The scenario modeling results, along with other analysis developed throughout the planning process, will be considered as the Council develops the draft power plan. Currently, the Council is targeting to release a draft of the power plan in mid-2026. This will provide sufficient time for a public comment process and to target completion of the final power plan by the end of 2026 or early 2027.

The Northwest Power Act outlines a clear role for broad public engagement in the Council's power planning and fish and wildlife efforts. To achieve this, advisory committees and regional engagement will be critical through the power plan preparation and review process. Their expertise and guidance will help shape the scope of scenario modeling and inform both draft and final inputs. Engagement in scenario modeling will also be necessary to guide the Council's recommendations. Finally, as the Council works to finalize the plan, it will have a public comment period and hold public hearings in each state to solicit important feedback in shaping the final plan.

Modeling Enhancements

The 2021 Power Plan calls on the Council and the region to revisit models and analytical approaches used in power planning. Tools that were designed to model the power systems in the past are not necessarily the right tools to address questions facing the power system that will be serving the region in the future. To ensure that it's using the best available tools, the Council has been enhancing its modeling suite for the past several years. This started with the Council's hydro operations and adequacy model, GENESYS, which was redeveloped for the 2021 Power Plan and has since been further enhanced and refined. The Council has also identified two new tools to support its load forecasting and regional capital expansion and portfolio optimization modeling. These enhancements will allow the Council to better understand the existing power system dynamics and provide to the region the most robust and useful recommendations as possible.

Load Forecasting

Demand for electricity is rapidly changing across the Northwest. End-uses are electrifying, as more consumers swap out their gasoline-powered cars for electric

vehicles and residences and businesses turn to highly efficient heat pumps for heating and cooling. Large technology corporations have identified the Northwest as an attractive region to locate massive new data centers. To address these dynamic changes, a new tool was needed for end-use load forecasting. After exploring multiple options, the Council selected the Statistically Adjusted End Use (SAE) Forecasting Framework by Itron. The Council is in the process of developing this model, with expected completion in April of 2024. The Council will use this tool, and lessons learned through development, to support the creation of load forecasts for the next plan.

The Itron SAE tool will enhance the Council's ability to study and forecast load on a more granular level. The Council is working with Itron to develop a model that will produce load forecasts at the balancing authority level. This will be informative for evaluating load growth unique to specific geographic areas. The new model will also have an enhanced ability to study the impact of weather conditions, such as temperature and solar conditions on an hourly basis. Another advantage of this new model is the ability to analyze the effect of end-use demand profiles from load sources, such as heat pumps and electric vehicle charging, and their impact on the power system at critical peak times.

Hydro Modeling and Regional Capital Expansion

The Council's GENESYS model evaluates hourly power system operation in the region and is used to assess system adequacy. This model was redeveloped for the 2021 Power Plan and has since been further enhanced and refined. GENESYS is tuned to be a middle ground between an operations and planning tool, providing a detailed understanding of hydropower system operation while utilizing publicly available planning level assumptions. Since the 2021 Power Plan, power division staff has continued to ensure that the model is effectively capturing and prioritizing the many hourly and monthly constraints on the system and have worked with plant operators and planners to assess and refine the model's ability to capture operations at each project. The power division staff has also worked on other enhancements to modeling, including improving the representation of resources outside the region and broadening the risk treatment of resources and loads across the Western Electricity Coordinating Council (WECC) footprint.

In addition to including hourly dispatch of the individual hydro projects, GENESYS currently models 17 zones within the region and 17 that are outside the region with interconnected transmission. This allows the Council to identify and better understand more localized impacts on resource adequacy and system operation, including

transmission constraints. The model also has an understanding of market fundamentals (hourly supply and demand), which allows for a more nuanced assessment of the implications of market reliance by incorporating not only a strict limit on net regional imports, but also allowing for the model to be further constrained when the market is tight.

For the ninth power plan, the Council has added a new tool to its suite called OptGen. This is another product from PSR, the developer of GENESYS. Like GENESYS, OptGen has a more detailed zonal topology. This will allow the Council to understand the locational value of resources and explore trade-offs between transmission development timelines and new resource options. OptGen is an improvement over the Council's previous tool (called the Regional Portfolio Model) due to many modeling enhancements, including OptGen's ability to conduct dynamic reserves accounting as well as represent the costs and risks of proposed portfolios' hourly operational implications.

Throughout 2024, the Council will continue developing and testing the capabilities of these new models. This will allow the Council to refine analytical questions explored through scenario modeling. Collectively, these model enhancements will better position the Council to analyze the dynamic changes in the power system and provide a more robust set of recommendations.

Proposed Ninth Plan Starting Point

The power plan starting point is a common set of assumptions from which the Council can explore various uncertainties. The Council is proposing that the starting point reflect the known elements of the existing system and resource options using the best available data at the start of analysis.

Existing System

For the starting point, the Council needs to establish the capabilities of the existing electricity system. This includes:

- Generating resources known to be in operation or under construction at the start of the plan period
- Owner-announced retirements or conversions of existing generating resources
- Existing transmission

- Planned transmission that has a high likelihood of getting completed in the Council’s planning timeframe (e.g. Boardman-to-Hemingway and Gateway West)
- Existing demand-side resources and trajectories, as captured in the Council’s frozen efficiency load forecast
- Current hydropower operations, including agreements spelled out in the December 2023 U.S. Government commitments and any updates to operations required by the Fish and Wildlife Program and the Biological Opinion
- Existing market(s) at time of modeling and any similar group (e.g. Western Resource Adequacy Program, balancing reserves groups)

The Council does not plan to include any proposed resources that are not under construction or not committed at the time of finalizing the inputs, or proposed transmission projects that do not appear on track for completion. The Council also does not plan to include any unplanned or unannounced resource retirements or conversion or proposed changes to hydro operations. Any risks or uncertainty around existing system capability may be explored through scenario analysis.

Policies and Regulation

For the starting point, the Council plans to include any existing policies or regulations impacting the power system that it can model. This will include state regulations, existing utility programs and goals (e.g. Idaho Power’s clean goals), as well as existing county and city goals in the region. The Council will also include existing federal regulations pertaining to the environmental methodology or informing the costs of resources (e.g. through incentives). The Council will strive to include any out of region existing state, utility, or local policies, programs, regulations, and goals, although this will be done in less detail.

The Council plans to include all policies reflected in the 2021 Power Plan¹¹ (that remain in effect today) and any new policies that have been enacted since the completion of the previous plan. These new policies include:

- Washington Climate Commitment Act
- Washington Clean Fuels Standard

¹¹ The 2021 Power Plan Supporting Materials provides a detailed description of the policies included that will also be factored into the starting point for the ninth power plan: https://www.nwcouncil.org/2021powerplan_existing-policies/.

- Washington Zero Emissions Vehicle Standard
- Washington State Energy Strategy
- Oregon Clean Energy Target Bill
- Oregon Climate Action Program
- Oregon Zero Emissions Vehicle Bill
- Inflation Reduction Act
- Bipartisan Infrastructure Law
- Creating Helpful Incentives to Produce Semiconductors (CHIPS) Act

In the 2021 Power Plan, the Council did not include any announced corporate goals in its analysis, such as those from Meta and Google. The Council is still considering whether and how to treat these types of corporate goals in the upcoming power plan and would welcome stakeholder comments on this specific topic.

The Council does not plan to include any proposed state or federal regulation, or other proposed goals in the starting point. These may be explored through scenario analysis.

New Resource Options

The Northwest Power Act requires that the Council give priority to cost-effective resources. To be considered cost-effective under the Power Act, the resource must be “reliable and available within the time it is needed.”¹² Therefore, the Council plans to focus on commercially available resources and resource conversions, as well as emerging resources reasonably assumed to be available within the power planning horizon. The Council is proposing a robust scenario to explore resource options and risk, described below. This scenario will be the place for the Council to explore the potential role that emerging resources might play in the future power system.

The new modeling tools and capabilities will allow the Council to explore opportunities and trade-offs with transmission build-out. Therefore, the Council is considering how to best analyze and evaluate this in the plan. One option is to include new transmission options, akin to new resource options, that can be selected in the model as part of portfolio optimization. Another option is to use scenario analysis to explore the implications of new resource development, after factoring in these proposed

¹² Northwest Power Act, Section 3(4)(A)(i).

transmission options at specific and different points in the future. The Council is currently exploring modeling capabilities to define a preferred path being mindful of modeling and staff time. The Council welcomes comments on the proposed options.

Weather and Climate Data

In the 2021 Power Plan, the Council used climate change data to inform its load forecasts, hydro operations, wind profiles, and energy efficiency and demand response potential. The Council plans to continue to use this climate change-informed data to model loads and resource options in the plan. The goal is to expand this analysis to address all resources options, including solar profiles, batteries, and natural gas generation, prioritizing those updates that will have the most meaningful impact.

In preparation for the ninth power plan, the power division staff is exploring how well the existing climate change data capture extreme events. This will help inform both the selection of climate change data for the starting point and potential scenario modeling needs. More discussion on the potential scenario analysis is described below.

Proposed Scenario Analysis

Scenario modeling provides the opportunity to explore the uncertainties and risk areas facing the power system. The Council has identified a few potential scenarios. The Council is seeking regional comment on these proposed scenarios, as well as other ideas, to understand regional priorities and align or adjust scenario scoping as needed to best meet those priorities. This early scoping will support modeling and data preparation, and it is expected to ultimately streamline analysis during the power plan review in 2025 and 2026.

Resource and Transmission Risk

One of the most significant areas of risk and uncertainty is around future resource and transmission cost and availability. In previous power plans, the Council explored how resource decisions shift with changes in the availability (or pace) of energy efficiency acquisition. For this upcoming plan, the Council is proposing to expand that to include other demand-side resources, generating resources, and transmission. This will also be an opportunity to explore the impact of changing costs on potential resource selection.

The Council proposes to address the following questions in this scenario:

- How do changing resource costs (increasing or decreasing) and availability of commercially available resources impact the new resource selection?
- For emerging resources, how might different timelines for availability or costs impact the overall resource selection? At what point do certain emerging resources become a viable option?
- How might the timing of different transmission projects impact the resource selection?
- What happens if supply chain constraints continue, transmission projects are delayed, and new emerging resources do not become available within the plan time horizon? How does this impact resource adequacy and the overall cost of compliance with meeting existing carbon policies?

The Council will not have the time to explore every possible iteration of cost and availability changes under this scenario. Rather, the Council proposes defining a set of uncertainties and risks to explore that will provide the most insightful and helpful information. The Council is seeking regional comments on any priority questions to be explored under this scenario.

West-Wide Decarbonization Policy

The proposed starting point described above includes all the existing clean and decarbonization goals and policies, both in-region and across the WECC. While these policies and goals cover a significant portion of the region's population, they vary in their scope and timing. Therefore, the Council is proposing a scenario that will explore the implications of a WECC-wide decarbonization policy. The purpose of this scenario would be to understand potential implications for Northwest resource decisions should there be wide-scale policies or drivers towards decarbonization that significantly increase loads and require carbon-free resources WECC-wide.

The Council must determine the best scope for this potential scenario, including whether it should focus on the power sector or be an economy-wide policy. If the Council pursues exploring an economy-wide decarbonization policy, it will seek to prioritize evaluation and analysis of elements that will have the largest impact on the power sector. The Council welcomes regional comments on potential scoping and priorities for this scenario.

Operational Flexibility

The Council's 2021 Power Plan identified the need for power system flexibility to support the integration of renewables. As renewable energy build-out increases, operational flexibility will continue to be a priority for power system planning. To better understand the potential implications for new resource development, the Council is proposing a potential scenario exploring this flexibility.

The Council expects one key focus of this scenario will be to explore trade-offs with hydropower flexibility. The 2021 Power Plan identified the potential for flexibility in the hydro system to support the daily ramping of renewables. While valuable for integrating renewables, this daily flexing may have negative impacts on fish and wildlife. This scenario could explore the trade-offs between leveraging and limiting the daily flexibility of the hydropower system.

The 2021 Power Plan also identified other system challenges during ramp hours. As resources tend to be uneconomical if only used for short stints of time, the Council's modeling found that there were times during adequacy events when these resources (mostly thermals) were sitting unused on the system. This scenario could explore the overall impact on new resource decisions if a set of resources (either existing or new) are designated to be used to specifically support renewable integration. The Council welcomes feedback on potential questions to be explored in an operational flexibility scenario.

Extreme Weather Stress Testing

By leveraging climate change data to inform loads and resources, the Council will capture many extreme events in its modeling. The power division staff is currently exploring how well the existing set of climate change data captures recent extreme events. Early indications are that many of the recent events experienced in the Northwest are captured within the existing climate change data, including the 2021 summer heat dome and the January 2024 winter event. Once the staff's analysis is complete, the Council will determine how to select climate change data to inform the starting point that ensures extreme events are appropriately captured in the modeling. The Council is also exploring methods for testing wildfire impacts on transmission availability as part of its analysis.

Once the data for the starting point are defined, the Council will determine whether any additional scenario modeling on extreme weather testing is required. Should additional

risk analysis be warranted, the Council is considering a couple of potential approaches. The first would be a scenario that increases the frequency of sampling extreme years as a stress test on the system. A second approach is to use the modeling runs from other scenarios and analysis and conduct a deep dive into how the system performed during specific extreme events. The Council welcomes regional comments on these or other approaches for exploring the risks of extreme weather.

Developing Recommendations to Bonneville

Under the Northwest Power Act, the Council's power plan has a direct connection to the Bonneville Power Administration in guiding its acquisition of new resources. In the 2021 Power Plan, the Council developed a scenario to specifically explore changes to Bonneville's obligation and implications for resource acquisition. For the next power plan, the Council proposes moving away from the approach of a single Bonneville scenario. Rather, the Council will leverage the insights it can draw from its modeling, which will now be able to glean greater insights at the balancing authority level, to inform recommendations relevant to Bonneville. For example, the Council's enhanced load forecasting capabilities will provide the ability to forecast different load trajectories for Bonneville's balancing area, as well as its customer utility balancing areas. These insights, coupled with the information gathered through the scenario modeling, are expected to provide sufficient information for the Council to develop recommendations to Bonneville.

Call for Comments

The Council is releasing this issue paper to stakeholder comment on the Council's early scoping for its next power plan. The Council will consider all comments received to refine the proposed scenario scoping. Throughout 2024, the Council will work to refine the potential scope of the next power plan to support model and data preparation in advance of official review. Stakeholder engagement throughout power plan preparation and development is critical. In addition to encouraging comments during this period, the Council welcomes involvement throughout the planning process. The Council will leverage its existing Advisory Committee structure to solicit regional expertise and perspective and use its public meetings to discuss and refine the analytical questions and inputs.