



California ISO



February 26, 2015 Western Planning Regions Coordination Meeting Stakeholder Comments

Commenter Contact Information

Received into info@nttg.biz: March 20, 2015 @ 5:33am (Pacific)

Name: Bob Burner

Organization: DATC – Duke American Transmission Company

Comments

Slide Number	DATC Comments - Page 1 of 1
3	Please include a discussion of the agreements, protocols and commercial arrangements, if any, that are contemplated between the Regions, RPSG and WECC to cover interregional planning and processing of interregional transmission projects (ITPs).
6 & 44	Please include a discussion and clarity around how ITPs like Zephyr from SE Wyoming to the Eldorado Valley will be processed. Consider that Zephyr is not looking for cost recovery. How would this differ from a project that is requesting cost recovery?
122	DATC supports the Regions in their endeavors to develop a robust coordinated interregional planning process for ITPs. DATC wish to register its view that WECC/TEPPC maintain a process to evaluate the effectiveness of ITPs by independent developers or multiple regions. DATC's view is that continuing the WECC process will offer an independent forum to evaluate ITPs that will potentially have major impacts on West wide economics and reliability.



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Commenter Contact Information

Received into info@nttg.biz: March 20, 2015 @ 1:38pm (Pacific)

Name: Mihai Cosman (via Katie Kaplan, Integrated Energy Solutions)

Organization: Exelon Corporation

Comments

Slide Number Exelon Comments - Page 1 of 2

Exelon appreciates the opportunity to submit comments as part of the ongoing stakeholder processes regarding the Western Planning Regions (WPR) effort to comply with the FERC order 1000 requirements on inter-regional transmission planning.

General Comments:

- Exelon applauds the collective efforts of the WPR and supports the overall effort to provide the Western region with a comprehensive transmission planning process, building upon the successes of each local region.
- The regions should continue regular stakeholder processes and establish a regular communication protocol. In order to facilitate the joint process, it would be helpful if there could be a single WPR communication process, and a single repository for the documents, data, and calendar associated with the WPR.
- It would also be helpful to provide a common set of definitions that all regions support.



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Exelon Corporation Comments (Continued - Page 2 of 2):

Comments on Inter-regional Model:

- Continued focus on unifying and updating the planning assumptions and base case development is critically important. Exelon supports the TEPPC and WECC-wide base case development, and encourages each region to ensure timely development of base cases including incorporating accurate and appropriate input assumptions into these base cases. To the extent the models are inaccurate or outdated it should be noted accordingly prior to the studies commencement.

- Consistency between regional models across the Western Planning regions is critical for identification of interregional transmission projects. If the definition of an interregional project is a project that shows benefit to more than one region, and transmission projects are to be cost-allocated based on these benefits, then a coordinated interregional process needs to be developed to ensure appropriate transmission projects are identified that align with regional needs and benefits.

Comments on Inter-regional Processes:

- During the stakeholder meeting on February 26, 2015 each region presented an overview of its project evaluation processes and criteria. In some cases there may be conflicting or alternate evaluation criteria utilized by different regions. In these cases clarity is needed, for example:

According to the posted business practice manuals, WestConnect uses 100% production cost savings over 10 years. The full mechanics of this production cost benefit analysis are not fully described in the manuals; however, it should be clarified that adjusted production cost (production cost after imports/exports are considered) is needed to support the identification of interregional projects. On the other hand, it is our understanding that the CAISO benefits analysis is not based on 100% production cost so it is unclear how a project that benefits both regions could pass both processes. Please clarify how the regions plan to resolve these inconsistencies.

Exelon recognizes that production cost is a difficult threshold to pass; and the regions may want to consider other factors like demand cost savings within the economic benefits test.



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Commenter Contact Information

Received into info@nttg.biz: March 20, 2015 @ 2:49pm (Pacific)

Name: Lee Terry

Organization: CDWR/SWP

Comments

Slide Number CDWR/SWP Comments - Page 1 of 1

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CDWR generally agrees with the characterization of Order 1000's requirements, and notes that each Region has the right to determine which projects are included in its regional plan, and that interregional project cost allocation should be based on a FERC-approved methodology.

113

All data sharing processes should be done in an understandable and transparent manner to stakeholders (including the provision of cost estimates, benefit assessments, project in-service dates, and updates to information) at regular intervals. CDWR supports the establishment of a common website and email distribution list to make this information available.

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CDWR recommends that each Region be given the choice to determine which option (Option A, Option B, or Option C) it will select for each of its regional planning activities. At minimum, the information should be posted on the common website. But each Region can assess the need to request input from other planning regions and to have an interregional coordination meeting depending on the nature of the activity.

114 & 115

In determining whether an Interregional Transmission Project (ITP) is a more cost effective or efficient solution to one or more of a Region's transmission needs, a Region must use evaluation standards and processes consistent with that Region's FERC-approved transmission planning process.

114 & 115

It is essential when evaluating an ITP that cost estimates are realistic. To that end, an ITP's construction and contingency costs should be made public to stakeholders for scrutiny. Moreover, any updates to estimates of an ITP's construction and contingency costs should be considered by the Region and made available to stakeholders.

In addition to close scrutiny of an ITP's cost estimates by the Regions and stakeholders, CDWR supports the establishment of cost caps for selected projects. If a project sponsor is selected based on faulty cost estimates, that project sponsor—not ratepayers—should be responsible for the cost increase.



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Commenter Contact Information

Received into info@nttg.biz: March 20, 2015 @ 4:07pm (Pacific)

Name: Justin Bieber

Organization: Pacific Gas and Electric (PG&E)

Comments

Slide Number Pacific Gas and Electric (PG&E) Comments - Page 1 of 1

103 - 115

Coordination Amongst Regions in California

- In the spirit of FERC Order 1000 it is critical to establish or maintain meaningful and consistent communication among planning regions. This is of particular importance between the CAISO and West Connect regions due to the geographical and overlapping proximity of the California members' transmission infrastructure. Since the California Transmission Planning Group is inactive, a forum should be created to allow West Connect, the CAISO and the transmission planning members of those organizations to meet and share planning information and look for synergies among projects that may be planned. This coordination is especially important as the state of California moves towards a 50% renewable energy future.

103 - 115

Dispute Resolution

- As the interregional planning process is developed, it could be very useful to establish an agreed upon dispute resolution process (DRP). Establishing an agreed upon DRP ahead of any disputes or disagreements can provide a quick, effective, and inexpensive method for resolving those disputes.



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Commenter Contact Information

Received into info@nttg.biz: March 20, 2015 @ 4:08pm (Pacific)

Name: Public Interest Organizations (submitted via Julia Prochnik)

Organization:

Comments

Slide Number Public Interest Organizations Comments - Page 1 of 5

Thank you for the opportunity to comment on the inter-regional presentation. FERC included interregional coordination requirements in Order No. 1000 to accompany the expanded regional planning established in Order No. 890, as those planning requirements were too narrowly focused geographically and failed to provide for adequate analysis of the benefits associated with interregional transmission facilities in neighboring transmission planning regions. Working together to identify interregional transmission and non-transmission solutions that are superior to regional solutions should be the focus.

We found the February 26 Western Planning Regional Coordination meeting very useful and look forward to further steps forward. Specifically, we support the hosting of another west-wide regional meeting before the end of the year and a number of webinars to coordinate data and other regional aspects, as was suggested at the meeting. We support these additional coordination opportunities and look forward to participating.

Incorporating WECC into the dialogue is critical, and we were encouraged to see the updated agenda providing more possibilities for collaboration with WECC to seek out complementary efforts, avoid gaps and duplication, and share data and modeling resources in assessment work relating to the Western Interconnection and its planning regions.

Below are recommendations and questions for a webinar or in-person meeting that the signers believe would enhance inter-regional coordination.



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Public Interest Organizations Comments (Continued, Page 2 of 5):

Public Policy

- Each of the regions should create a timeline showing how long it takes a public policy requirement - from its formal adoption - to be incorporated into a plan.
- The regions should discuss the scenarios introduced at the February 26 meeting concerning the EPA 111(d) proposed rulemaking and the potential implications.
- Updates on public policy incorporation into regional plans and how to coordinate among regions (especially sharing lessons learned since this is so new for many parties) should be discussed.
- In other parts of the country stakeholders are advocating that transmission solutions considered in Order 1000 be treated as a compliance strategy. Have all public policy considerations been accounted for, including compliance with the federal Clean Power Plan?
- Another scenario for the regions to consider and or collaborate with WECC is regarding the water-energy nexus.

Coordination

- How will the regions share data from their regional plans? Will they have webinars to compare and contrast notes? What plans are there to assess data exchange and whether models in each region can easily use the data provided by the others?
- Will the regions coordinated on the regional project sponsor forms and data submissions to ensure comparability? It would make the entire process much easier if project sponsors could submit substantially the same packet to each region.
- What is the mechanism for regions to coordinate and list possible inter-regional projects?



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Public Interest Organization Comments (Continued - Page 3 of 5):

Inter-regional Planning Specifics

- Will the four regions set up an inter-regional cost allocation and planning committee to discuss inter-regional projects and assess benefits and beneficiaries?
- Many stakeholders voiced the need for a one-stop shop to find all regional information in one place- will a website be set up? We believe such a process would be extremely beneficial to enhance stakeholder outreach and coordination.
- How does the RAPID toolkit developed by Tetra Tech through the Western Governors Association work into the regional planning efforts? It seems it could help with GIS and other aspects.
- What is the inter-regional non-transmission alternatives strategy? Will the regions include the possibility of an NTA addressing a regional need in interregional discussions, and how will this happen?
- Have the regions discussed how very large transmission projects could impact a neighboring system (costs, benefits...)?
- The four regions should plan at every inter-regional meeting to list the projects which are classified as inter-regional or which have inter-regional benefits.
- On one of the upcoming interregional webinars, the regions should discuss opportunities to share insights with the Eastern Interconnection planning regions and ERCOT.



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Public Interest Organizations Comments (Continued - Page 4 of 5):

Specific Slide Comments

- Slide 106- we look forward to better understanding the discrete points of data in the regional process where data will be shared.

- Slide 107- we see ample opportunity for additional scenarios and see a great parallel here with WECC coordination.

- Slide 109- we agree stakeholder input is essential to the process and look forward to being kept fully informed.

- Slides 114-115 – we agree that joint evaluation are necessary.

- During the presentation it was recommended that a representative from each region, WECC, and all relevant WECC planning committees should meet to discuss how to better coordinate and not duplicate efforts. We strongly support such an initiative.

- Again each region's ultimate responsibility is to their customers, and inter-regional benefits are extremely important.

- We believe most of the issues mentioned above should be addressed on a webinar in August or sooner if possible.



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Public Interest Organization Comments (Continued - Page 5 of 5):

WECC

- In particular, we are encouraged by the increasing interest in active coordination with WECC, and look forward to helping wherever possible. We agree it is important to avoid duplication and coordinate data, and do so in an inclusive manner.

- Slide 125 – Regions can provide, and we support:

Coordination with WECC

- Review and validation of WECC results and changes made to Common Case and assumptions
- Representation on PCC, TEPPC, MAC

- We look forward to working with the planning regions as they continue to discuss implementation of coordination requirements to meet compliance obligations and specifically as mentioned on slide 128:

- Regions' coordination with WECC,
- Defining specific deliverables that will be needed to implement compliance, and
- Further definition of process for Joint Evaluation of ITPs.



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February 26, 2015 Western Planning Regions Coordination Meeting Stakeholder Comments

Commenter Contact Information

Received into info@nttg.biz: March 23, 2015 @ 10:52am (Pacific)

Name: Sandeep Arora

Organization: LS Power Development, LLC

Comments

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LSP would encourage all Regions to share relevant interregional data/information with interested stakeholders. Perhaps, creating a distribution list of all interested parties, and also creating a common webpage with all relevant interregional planning coordination information is the right approach. This will allow stakeholders to follow inter regional activities in a much more efficient way.

114

It is currently proposed that ITP proponents can submit an Interregional Project to relevant planning regions by Mar 31 for even numbered years. We recommend Regions to allow such submission opportunities more frequently, if practical. For instance, consider an ITP that potentially benefits two regions, where first region runs an Annual Planning cycle and second region runs a 2-year cycle, then ITP proponent should be able to submit this project to the First Region by Mar 31 of any year (not just even year), rather than having to wait an additional year. Second region may not be able to review this project until next year but at least having the review done by First Region in the first year should provide the project an opportunity to be considered as a solution for any planning issues identified by this region for its current Annual planning cycle.

In addition, it should be a requirement for a Relevant Planning Region to study a requested Interregional Transmission Project. Otherwise, there may be incomplete results related to the benefits of an Interregional Transmission Project studied by some but not all Relevant Planning Regions.



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115	<p>LS Power Comments (Continued - Page 2 of 2):</p> <p>Some Interregional projects may not specifically meet a Regional need identified in the Regional Plans, but may otherwise provide significant economic and/or policy benefits to the Relevant Planning Regions. Regions should encourage participation of such projects in the Interregional planning process, and should evaluate the merit of these proposals beyond the current paradigm, which is that Regions test if the Interregional Transmission Project meets a Regional need. In addition to providing economic & policy benefits, some interregional projects can potentially also enhance benefits from Energy Imbalance Market (EIM) that is currently in place between Balancing Authority Areas (BAAs) of some Regions and is expected to be joined by more BAAs in future. In addition to improving reliability between two regions, an Interregional Transmission Project can provide significant economic savings to the regions by improving market participation. These benefits should be captured as part of the review of an Interregional Transmission Project; rather than only testing if the project can offset a Regional need.</p>
117	<p>LS Power is encouraged by the progress all Regions have made in improving Interregional coordination. As next steps, LS Power suggests that Regions should draft an Interregional coordination procedure, similar to the Business Practice Manual that each region has for its Regional Plan. This procedure should clearly outline the entire interregional coordination process, including when the ITP projects can be submitted, how the projects will be reviewed by the Regions, what benefits will be analyzed, what planning cases/economic models will be used for studies, what public policy objectives will be considered, how will the costs be shared between the regions (for projects that show economic benefits to more than one region), and where will the planning cases and Interregional plans be posted. Such procedure will allow the stakeholders to better participate in the Interregional processes. We encourage the Regions to have more stakeholder discussions and participation in drafting this procedure.</p>
	<p>LS Power thanks the Regions for this opportunity to submit comments, and stands committed to assisting the Regions in implementing the Interregional procedures, as needed.</p>