

**SUPPORTING STATEMENT FOR**  
**“Transmission Planning and Cost Allocation by Transmission Owning**  
**and Operating Public Utilities,” FERC-917 (OMB No. 1902-0233)**  
**NOPR in Docket No. RM10-23-000, (RIN No. 1902-AE03)**

In this Notice of Proposed Rulemaking (NOPR) in Docket No. RM10-23-000 (RIN No. 1902-AE03), the Federal Energy Regulatory Commission (Commission or FERC) is proposing to reform its electric transmission planning and cost allocation requirements for public utility transmission providers. The proposed reforms are intended to correct deficiencies in transmission planning and cost allocation processes so that the transmission grid can better support wholesale power markets and thereby ensure that Commission-jurisdictional services are provided at rates, terms and conditions that are just and reasonable and not unduly discriminatory or preferential.

**A. Justification**

**1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY**

The Commission has a statutory obligation under the Federal Power Act (FPA) to prevent unduly discriminatory practices in transmission access. Toward this goal, in its 1996 landmark Order No. 888<sup>1</sup>, the Commission requested public utilities to provide others with access to electric power transmission lines. Concurrently, through Order No. 889<sup>2</sup>, the Commission adopted standards and information requirements for Open Access Same-Time Information Systems (OASIS). In 2007, the Commission addressed newly identified opportunities for undue discrimination in electric power transmission, through its issue of Order No. 890<sup>3</sup>. The Commission, in RM10-23-000, proposes reforms to

---

<sup>1</sup> Promoting Wholesale Competition Through Open Access Non-discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, Order No. 888, 61 FR 21540 (May 10, 1996), FERC Stats. & Regs. ¶ 31,036 (1996), order on reh’g, Order No. 888-A, 62 FR 12274 (Mar. 14, 1997), FERC Stats. & Regs. ¶ 31,048 (1997), order on reh’g, Order No. 888-B, 81 FERC ¶ 61,248 (1997), order on reh’g, Order No. 888-C, 82 FERC ¶ 61,046 (1998), aff’d in relevant part sub nom. Transmission Access Policy Study Group v. FERC, 225 F.3d 667 (D.C. Cir. 2000) (TAPS v. FERC), aff’d sub nom. New York v. FERC, 535 U.S. 1 (2002).

<sup>2</sup> Open Access Same-Time Information System (Formerly Real-Time Information Networks) and Standards of Conduct, Order No. 889, 61 FR 21737 (May 10, 1996), FERC Stats. & Regs. ¶ 31,035 (1996), order on reh’g, Order No. 889-A, FERC Stats. & Regs. ¶ 31,049 (1997), order on reh’g, Order No. 889-B, 81 FERC ¶ 61,253 (1997).

<sup>3</sup> Preventing Undue Discrimination and Preference in Transmission Service, Order No. 890,

these rules to further prevent undue discrimination in the provision of transmission service.

In Order No. 888, the Commission required public utilities to provide transmission customers with equal and timely access to transmission and ancillary service tariff information through OASIS website postings. The Commission believed that transmission customers must have simultaneous access to the same information available to transmission providers if truly nondiscriminatory transmission services are to exist.

In Order No. 889, the Commission adopted business practice standards and information requirements for OASIS. During their development, the Commission relied heavily on the assistance provided by all segments of the wholesale electric power industry and its customers in ad hoc working groups that offered consensus proposals for the Commission's consideration.

In Order No. 676<sup>4</sup>, issued in 2006, the Commission incorporated by reference and placed into operation, standards developed by the North American Energy Standards Board's Wholesale Electric Quadrant. These standards covered OASIS business practice standards, including the posting requirements, OASIS Standards and Communication Protocols and Data Dictionary.

Through the development of Order No. 676, it became apparent to the Commission that more work was needed leading to the issue of Order No. 890 on February 16, 2007. Order No. 890 requirements were necessary to: (1) strengthen the pro forma Open Access Transmission Tariff (OATT), to ensure that it achieves its original purpose of remedying undue discrimination; (2) provide greater specificity to reduce opportunities for undue discrimination and facilitate the Commission's enforcement; and (3) increase transparency in the rules applicable to planning and use of the transmission system.

Order No. 890 requirements fell into two general categories: (1) OATT pro forma tariff changes in 18 CFR 35.28, and (2) OASIS website posting requirements in 18 CFR 37.6 and 37.7.

FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009).

<sup>4</sup> *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, at P 882-893, *clarified*, 121 FERC ¶ 61,260, at P 9, 10, App. D-1 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055 (2008), *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010).

In pro forma OATTs, the Commission:

- adopted provisions necessary to keep imbalance charges closely related to incremental costs
- required creditworthiness information
- established consistent available transfer capability calculation methodologies
- required an open, transparent, and coordinated transmission planning process
- gave the right to customers to request from transmission providers, studies addressing congestion and/or integration of new resource loads
- required the inclusion of statements with each application for network service or to designate a new network resource that attests, for each network resource identified, that the transmission customer owns or has committed to purchase, the designated network resource and the designated network resource comports with the requirements for designated network resources
- required for capacity reassignment
  - all sales or assignments of capacity be conducted through, or otherwise posted on, the transmission provider's OASIS on or before the date the reassigned service commences
  - assignees of transmission capacity to execute a service agreement prior to the date on which the reassigned service commences
  - transmission providers to aggregate and summarize in an electric quarterly report the data contained in these service agreements and
  - adopted an operational penalties annual filing.

The Commission required new OASIS postings: explanations for changes in available transmission capability values; capacity benefit margin reevaluations and quarterly postings; OASIS metrics and accepted/denied requests; planning redispatch offers and reliability redispatch data; curtailment data; planning and system impact studies; metrics for system impact studies; and all rules.

The Commission required a NERC/NAESB<sup>5</sup> team to draft and review Order No. 890 reliability standards and business practices. The team was to solicit comment from each utility on developed standards and practices, and utilities were to implement each, after Commission approval. Public utilities, working through NERC, revised reliability standards to require the exchange of data and coordination among transmission providers and, working through NAESB, developed complementary business practices.

Incorporating the Order No. 890 standards into Commission's regulations made the standards mandatory and benefited wholesale electric customers by streamlining utility business practices, transactional processes, and OASIS procedures, and by adopting a

---

<sup>5</sup> NERC is the North American Electric Reliability Council. NAESB is the North American Energy Standards Board.

formal ongoing process for reviewing and upgrading the Commission's OASIS standards and other electric industry business practices.

Transmission planning processes, particularly at the regional level, have seen substantial improvement through compliance with Order No. 890. The Commission believes that the expanded cooperation and collaboration that is now occurring in transmission planning both among transmission providers, and between transmission providers and their stakeholders, is to be commended. However, deficiencies remain in transmission planning and cost allocation that are inhibiting the transmission grid from better supporting wholesale power markets and thereby ensuring that the Commission-jurisdictional services are provided at rates, terms and conditions that are just and reasonable and not unduly discriminatory or preferential.

### **Proposed Rule in Docket No. RM10-23-000**

RM10-23-000's proposed reforms are needed to protect against unjust and unreasonable rates, terms and conditions and undue discrimination in the provision of Commission-jurisdictional services. The Commission proposes reforms in RM10-23-000 as follows.

### **Transmission Planning Reforms**

Participation in regional transmission planning<sup>6</sup> processes accounts for transmission needs driven by public policy objectives established by state or federal laws and regulations. Since the issuance of Order No. 890, it has become apparent to the Commission that Order No. 890's regional participation principle may not be sufficient, in and of itself, to ensure an open, transparent, inclusive, and comprehensive regional transmission planning process. Without such a process, each transmission provider will not have information needed to assess proposed projects and determine which project or group of projects could satisfy local and regional needs more efficiently and cost-effectively. To correct this, the Commission proposes the following:

- Each public utility transmission provider must participate in a regional transmission planning process that produces a regional transmission plan and that meets the following transmission planning principles established in Order No. 890: (1) coordination; (2) openness; (3) transparency; (4) information exchange; (5) comparability; (6) dispute resolution; and (7) economic planning studies.
- Each regional transmission planning process must consider and evaluate transmission facilities and other non-transmission solutions that may be proposed and develop a regional transmission plan that identifies the transmission facilities that cost-effectively meet the needs of transmission

---

<sup>6</sup> The NOPR's Attachment K describes as "intraregional" planning, p.127.

providers, their transmission customers, and other stakeholders.

Because of the increased importance of regional transmission planning that is designed to produce a regional transmission plan, transmission customers and other stakeholders must be provided with an opportunity to participate meaningfully in that process. Therefore the Commission proposes to apply the Order No. 890 transmission planning principles to the regional transmission planning process, which would ensure that transmission customers and other stakeholders can express their needs before a regional transmission plan is finalized and thus helps to identify solutions that more efficiently address the region's needs.

Greater access to information and transparency would also help transmission customers and other stakeholders to recognize and understand the benefits that they will receive from a transmission facility that is included in a regional transmission plan. This consideration is particularly important in light of the Commission's proposal below to require that each public utility transmission provider have a cost allocation method for transmission facilities included in its regional transmission plan that reflects the benefits that those facilities provide.

The Commission believes that while ensuring system reliability should remain the primary goal of the transmission planning process, providing for incorporation of public policy objectives, where applicable, could facilitate cost-effective achievement of those objectives. Toward this end, the Commission proposes to require each public utility transmission provider to:

- Amend its OATT such that its local and regional transmission planning processes explicitly provide for consideration of public policy objectives established by state or federal laws and regulations that may drive transmission needs.
- Coordinate with its customers and other stakeholders to identify public policy objectives established by state or federal laws and regulations that are appropriate to include in its local and regional transmission planning processes.
- Specify in its OATT the procedures and mechanisms in its local and regional transmission planning processes for evaluating transmission projects proposed to achieve public policy objectives established by state or federal laws or regulations. If a public utility transmission provider believes that its existing transmission planning processes satisfy these requirements, then it must make that demonstration in its compliance filing.

**Proposed Reforms Regarding Nonincumbents<sup>7</sup>**

The Commission preliminarily finds that all potential transmission facility developers, both incumbent and nonincumbent, should have a comparable opportunity under its regulations to participate in an open and transparent regional transmission planning process and should share similar benefits and obligations commensurate with that participation. In order to ensure this, the Commission proposes to:

- Require each public utility transmission provider to participate in a regional transmission planning process that includes a not unduly discriminatory process for transmission project submission and selection.
- Eliminate from a transmission provider's OATT or agreements subject to the Commission's jurisdiction of provisions that establish a federal right of first refusal for an incumbent transmission provider with respect to facilities that are included in a regional transmission plan.

Tariff changes to implement these proposed reforms would be developed through an open and transparent process involving the public utility transmission provider, its customers, and other stakeholders. In support of this, the Commission proposes to require:

- Each public utility transmission provider to revise its OATT to demonstrate that the regional transmission planning process in which it participates has established appropriate qualification criteria for determining an entity's eligibility to propose a project in the regional transmission planning process, whether that entity is an incumbent transmission owner or a nonincumbent transmission developer. These criteria will be required to be included in the public utility transmission provider's OATT.
- Each public utility transmission provider to revise its OATT to include a form by which a prospective project sponsor would provide information in sufficient detail to allow the proposed project to be evaluated in the regional transmission planning process. All proposals to be considered in a given transmission planning cycle must be submitted by a single, specified date, to minimize the opportunity for other entities to propose slight modifications to already submitted projects.
- Each public utility transmission provider participate in a regional transmission planning process that evaluates the proposals submitted to the

---

<sup>7</sup> Nonincumbents are transmission providers who are not members of a regional transmission organization.

regional planning process through a transparent and not unduly discriminatory or preferential process. Each public utility transmission provider will be required to describe in its OATT the process used for evaluating whether to include a proposed facility in the regional transmission plan

- Removal from a transmission provider's OATT or agreements subject to the Commission's jurisdiction provisions that establish a federal right of first refusal for an incumbent transmission provider.<sup>8</sup> We also propose to require each public utility transmission provider to amend its OATT to describe how the regional transmission planning process in which it participates provides for the sponsor (whether an incumbent transmission provider or a nonincumbent transmission developer) of a facility that is selected through the regional transmission planning process for inclusion in the regional transmission plan to have a right to construct and own that facility.

- That if a proposed project is not included in a regional transmission plan and if the project's sponsor resubmits that proposed project in a future transmission planning cycle, that sponsor would have the right to develop that project under the foregoing rules even if one or more substantially similar projects are proposed by others in the future transmission planning cycle. The OATT must state that this priority to own the proposed facility continues for a defined period of time (for resubmission annually in subsequent transmission planning cycles over a 5-year period).

- That if an incumbent transmission project developer may recover the cost of a transmission facility for a selected project through a regional cost allocation method, a nonincumbent transmission project developer must enjoy that same eligibility.

### **Interregional Coordination**

The Commission proposes to require each public utility transmission provider, through its regional transmission planning process, to coordinate with the public utility transmission providers in each of its neighboring transmission planning regions within its interconnection to address transmission planning issues.<sup>9</sup> This coordination between transmission planning regions must take into consideration the public policy objectives incorporated into each regional transmission planning process as required above, and must be reflected in an interregional transmission

---

<sup>8</sup> If a FERC-approved tariff or agreement contains a reference to a right provided under state law, such a provision would not be subject to this requirement.

<sup>9</sup> This proposal does not require a public utility transmission provider to enter into an interregional transmission planning agreement with a neighboring transmission planning region in another interconnection.

planning agreement to be filed with the Commission.

The interregional transmission planning agreement may be developed on behalf of the public utility transmission providers within multiple transmission planning regions.

The interregional transmission planning agreement must include a detailed description of the process for coordination between public utility transmission providers in neighboring transmission planning regions with respect to facilities that are proposed to be located in both regions, as well as interregional facilities that are not proposed but that could address transmission needs more efficiently.

Each public utility transmission provider must ensure the following elements are included in any interregional transmission planning agreement in which it participates, in order to ensure a proactive, comprehensive process:

- A commitment to coordinate and share the results of respective regional transmission plans to identify possible interregional facilities that could address transmission needs more efficiently than separate intraregional facilities;
- An agreement to exchange at least annually planning data and information;
- A formal procedure to identify and evaluate transmission facilities that are proposed to be located in both regions; and
- A commitment to maintain a website or e-mail list for the communication of information related to the coordinated planning process.

### **Transmission Cost Allocation**

In an effort to more closely align transmission planning and cost allocation processes, the Commission proposes to require that every public utility transmission provider have in place a method, or set of methods, for allocating the costs of new transmission facilities that are included in the transmission plan produced by the transmission planning process in which it participates. If the public utility transmission provider is an RTO or ISO, then the method or methods would be required to be set forth in the RTO or ISO tariff. In other transmission planning regions, each public utility transmission provider located within the region would be required to set forth in its tariff the method or methods for cost allocation used in its transmission planning region setting out clearly and in detail how they are in compliance with this rule.

The proposed rule would permit a public utility transmission provider or

transmission planning region to distinguish or not distinguish among these three types of transmission facilities<sup>10</sup>, as long as each of the three is considered in the transmission planning process and there is a means for allocating the costs of each type of facility to beneficiaries.

Each public utility transmission provider within a transmission planning region, will be required to work with transmission providers located in neighboring transmission planning regions to develop a mutually agreeable method or methods for allocating between the two transmission planning regions the costs of a new interregional transmission facility that is located within both transmission planning regions.

The cost allocation method must satisfy the six cost allocation principles set out in the upcoming final rule in Docket No. RM10-23-000.

#### Intraregional Cost Allocation

The cost of transmission facilities must be allocated to those within the transmission planning region that benefit from those facilities in a manner that is at least roughly commensurate with estimated benefits. In determining the beneficiaries of transmission facilities, a regional transmission planning process may consider benefits including, but not limited to, the extent to which transmission facilities, individually or in the aggregate, provide for maintaining reliability and sharing reserves, production cost savings and congestion relief, and/or meeting public policy objectives established by state or federal laws and regulations that may drive transmission needs.<sup>11</sup>

The allocation method for the cost of an intraregional facility must allocate costs solely within that transmission planning region and cannot assign costs involuntarily to another region. However, the transmission planning process in the original region must identify consequences for other transmission planning regions, such as upgrades that may be required in another region and, if there is an agreement for the original region to bear costs associated with such upgrades, then

---

<sup>10</sup> Facilities identified by the region as necessary to satisfy reliability standards, reduce congestion, and enable compliance with public policy requirements established by state or federal laws or regulations. ¶3. NOPR.

<sup>11</sup> As discussed above, the Commission proposes to require each public utility transmission provider to amend its OATT such that its local and regional transmission planning processes explicitly provide for consideration of public policy objectives established by state or federal laws and regulations that may drive transmission needs.

the original region's cost allocation method or methods must include provisions for allocating the costs of the upgrades among the entities in the original region.

The cost allocation method and data requirements for determining benefits and identifying beneficiaries for a transmission facility must be transparent with adequate documentation to allow a stakeholder to determine how they were applied to a proposed transmission facility.

A transmission planning region may choose to use a different cost allocation method for different types of transmission facilities in the regional plan, such as transmission facilities needed for reliability, congestion relief, or to achieve public policy objectives. Each cost allocation method must be set out clearly and explained in detail in the compliance filing for this rule.

In proposing these principles, the Commission does not intend to prescribe a one-size-fits-all approach to cost allocation for new intraregional transmission facilities. Public utility transmission providers in each transmission planning region will be allowed to develop a transmission cost allocation method that best suits the needs of that transmission planning region.

#### Interregional Cost Allocation

The Commission proposes to require that the public utility transmission providers located in each pair of neighboring transmission planning regions develop a mutually agreeable method for allocating between the two transmission planning regions the costs of a new transmission facility that is located within both regions. In an RTO or ISO region, the method must be filed to become a part of the relevant tariffs. In other transmission planning regions, the cost allocation method must be filed as part of the OATT of each public utility transmission provider in the region.

A group of three or more transmission planning regions within an interconnection—or all of the transmission planning regions within an interconnection—may agree on and file a common method for allocating the costs of a new interregional transmission facility. However, the Commission does not propose to require such agreements among more than two neighboring transmission planning regions.

Each cost allocation method filed in accordance with this proposal would be required to comply with the following principles:

- The costs of a new interregional facility must be allocated to each transmission planning region in which that facility is located in a manner that is at least roughly commensurate with the estimated benefits of that facility in

each of the transmission planning regions. In determining the beneficiaries of transmission facilities, a regional transmission planning process may consider benefits including, but not limited to, those associated with maintaining reliability and sharing reserves, production cost savings and congestion relief, and meeting public policy objectives established by state or federal laws and regulations that may drive transmission needs.<sup>12</sup>

- A transmission planning region that receives no benefit from an interregional transmission facility that is located in that region, either at present or in a likely future scenario, must not be involuntarily allocated any of the costs of that facility.

- If a benefit-cost threshold ratio is used to determine whether an interregional transmission facility has sufficient net benefits to qualify for interregional cost allocation, this ratio must not be so large as to exclude a facility with significant positive net benefits from cost allocation.

- Costs allocated for an interregional facility must be assigned only to transmission planning regions in which the facility is located. Costs cannot be assigned involuntarily under this rule to a transmission planning region in which that facility is not located. However, the interregional planning process must identify consequences for other transmission planning regions, such as upgrades that may be required in a third transmission planning region and, if there is an agreement among the transmission providers in the regions in which the facility is located to bear costs associated with such upgrades, then the interregional cost allocation method must include provisions for allocating the costs of the upgrades within the transmission planning regions in which the facility is located.

- The cost allocation method and data requirements for determining benefits and identifying beneficiaries for an interregional facility must be transparent with adequate documentation to allow a stakeholder to determine how they were applied to a proposed transmission facility.

- The public utility transmission providers located in neighboring transmission planning regions may choose to use a different cost allocation method for different types of interregional facilities, such as transmission facilities needed for reliability, congestion relief, or to achieve public policy objectives. Each

---

<sup>12</sup> The Commission proposes to require each public utility transmission provider to amend its OATT such that its local and regional transmission planning processes explicitly provide for consideration of public policy objectives established by state or federal laws and regulations that may drive transmission needs.

cost allocation method must be set out and explained in detail in the compliance filing for this rule.

**2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION**

The information is used

- by transmission providers and stakeholders to improve the processes of (1) planning transmission projects (both within and between regions), (2) considering public policy objectives, (3) determining possible alternatives that would be more efficient, and (4) allocating costs among the entities that benefit from the project
- by transmission customers and participants to identify and efficiently gauge available transmission resources as well as provide equal access to transmission services. *Pro forma* OATT tariffs are posted on the Commission's eLibrary website: <http://elibrary.ferc.gov/idmws/search/fercgensearch.asp>.

In a shift in Commission policy, the NOPR is directing that transmission planners when developing a regional plan must account for federal and/or state public policy requirements, such as renewable resource mandates that will have an affect on transmission needs.

Without this information, the Commission would not be able to meet its statutory obligation under the Federal Power Act (FPA) to prevent unduly discriminatory practices in transmission access.

**3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN**

With the implementation of the Commission's new eTariff system, tariffs can be eFiled with the Commission. Neither respondents nor the Commission have identified any methodology more advanced than that which is currently in use.

**4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION 2.**

The Commission is the only federal agency to regulate interstate electric power transmission, therefore other agencies would not be expected to collect this tariff-specific

information. There is no other known source for the information.

## **5. METHODS USED TO MINIMIZE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES**

This proposed rule applies to public utilities that own, control or operate interstate transmission facilities other than those that have received waiver of the obligation to comply with Order Nos. 888, 889 and 890. The total estimated number of public utility transmission providers that, absent waiver, would have to modify their current OATTs by filing the revised pro forma OATT is 134. Of these public utility transmission providers, an estimated 10 filers, or 7.3% percent, have output of four million MWh or less per year.<sup>13</sup> Each of these entities retains its rights to waiver of these requirements. The criteria for waiver that would be applied under this rulemaking for small entities is unchanged from that used to evaluate requests for waiver under Order Nos. 888, 889 and 890.

## **6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY**

Tariff information is required once per utility and as circumstances change. Collecting it less frequently would mean the information is not available to transmission providers and other stakeholders.

## **7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION**

There are no special circumstances requiring the collection to be conducted in a manner inconsistent with Commission regulations.

## **8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS**

Technical conferences were held in 2009 on September 3rd in Phoenix, Arizona, on September 10th in Atlanta, Georgia and on September 21st, in Philadelphia, Pennsylvania. Internet links to the agenda and prepared opening remarks are in

---

<sup>13</sup> A firm is “small” if, including its affiliates, it is primarily engaged in the generation, transmission, and/or distribution of electric energy for sale and its total electric output for the preceding fiscal year did not exceed 4 million megawatt hours. Based on the filers of the annual FERC Form 1 and Form 1-F, as well as the number of companies that have obtained waivers, we estimate that 7.3% of the filers are “small.”

Attachment A.

A notice of request for comments was published in the Federal Register on October 8, 2009<sup>14</sup> (Attachment B). Links to the comments are in Attachment C.

Commission answers to the responses to the notice for comments can be found in RM10-23-000 in paragraph numbers:

- 16-23 (transmission planning and cost allocation in general),
- 57-60 (public policy driven projects)
- 72-84 (merchant and independent transmission developers' participation in the regional transmission planning process)
- 103-109 (interregional planning reforms)
- 126-134 (allocating the cost of transmission facilities)

## 9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No gifts or payments have been made to the respondents.

## 10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

There are no special circumstances relating to this information.

## 11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE THAT ARE CONSIDERED PRIVATE.

There are no questions of a sensitive nature that are considered private.

## 12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Commission estimates of the burden associated with the required information are shown below.

<b>FERC-917 - Proposed Reporting Requirements in RM10-23</b>	<b>Annual Number of Respondents (Filers)</b>	<b>Annual Number of Responses</b>	<b>Hours per Response</b>	<b>Total Annual Hours in Year 1</b>	<b>Total Annual Hours in Subsequent Years</b>
participation in a transparent and open intraregional transmission planning	134	134	100 hrs in Year 1; 50	13400	6700

<sup>14</sup> Federal Energy Regulatory Commission, Notice of Request for Comments; Transmission Planning Processes under Order No. 890; Docket No. AD09-8-000, October 8, 2009.

process that meets transmission planning principles, includes consideration of public policy objectives, identifies and evaluates facilities to meet needs, develops cost allocation method, and produces an intraregional transmission plan that describes and incorporates a cost allocation method that meets the Commission's principles.			hrs. in subsequent years		
coordination, development, and filing with the Commission of interregional planning agreements that meet the Commission's requirements, that include consideration of public policy objectives, and that incorporate cost allocation methods that meets the Commission's principles; provide or post ongoing communications, and provide annual data exchange.	134	134	125 hrs. in Year 1; 50 hrs. in subsequent years	16750	6700
conforming tariff changes for local transmission planning, including those related to consideration of public policy objectives; and conforming tariff changes for intraregional and interregional planning.	134	134	50 hrs. in Year 1; 25 hours in subsequent years	6700	3350
<b>Total Estimated Additional Burden Hours, Proposed for FERC-917 in NOPR in RM10-23</b>				36850	16750

**13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS**

The Commission has projected costs of compliance for the reporting requirements as follows:

- Year 1: \$4,200,900 [36,850 hours x \$114 per hour<sup>15</sup>]
- Subsequent Years: \$1,909,500 [or 16,750 hours x \$114 per hour]

---

<sup>15</sup> The estimated cost of \$114 an hour is the average of the hourly costs of: attorney (\$200), consultant (\$150), technical (\$80), and administrative support (\$25).

OMB's regulations require it to approve certain information collection requirements imposed by an agency rule. The Commission is submitting notification of this proposed rule to OMB. The Commission proposes to make the reporting requirements mandatory.

#### **14. ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

The estimated annualized cost to the Federal Government follows:

\$965,118 (for 7 full-time employees using \$137,874/year, and 2,080 hours per year) plus the annual cost for clearance is \$1,528, giving an annual total of \$966,646.

The estimate of the cost to the Federal Government is based on salaries for professional and clerical support, as well as direct overhead costs.

#### **15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE**

Building on the reforms in Order No. 890, the Federal Energy Regulatory Commission is proposing amendments to the pro forma OATT to correct certain deficiencies in transmission planning and cost allocation requirements for public utility transmission providers. The purpose of this proposed rulemaking is to strengthen the pro forma OATT, so that the transmission grid can better support wholesale power markets and ensure that Commission-jurisdictional services are provided at rates, terms and conditions that are just and reasonable and not unduly discriminatory or preferential. We propose to achieve this goal by reforming electric transmission planning requirements and establishing a closer link between cost allocation and regional transmission planning processes.

#### **16. TIME SCHEDULE FOR THE PUBLICATION OF DATA**

This is not a collection of information for which results are planned to be published.

Filings are, however, made available to the public through their inclusion in the Commission's eLibrary. The eLibrary document repository is accessible from the Commission's web site: <http://www.ferc.gov>.

The NOPR would apply to all Commission-jurisdictional transmission providers, including RTOs and ISOs, and they would have six months from the effective date of the final rule to submit tariff filings showing how they are complying with the proposed requirements. However, for interregional requirements, transmission providers would have an additional six months to make these compliance filings.

#### **17. DISPLAY OF EXPIRATION DATE**

It is not appropriate to display the expiration date for OMB approval of the

Information collected. Currently, the information on the tariff filings is not collected on a standard, preprinted form which would avail itself to this display. Rather, public utilities and licensees prepare and submit filings that reflect the unique or specific circumstances related to rates and services involved in the filing. In addition, the information contains a mixture of narrative descriptions and empirical support that varies depending on the nature of the services to be provided.

## **18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

There is an exception to the Paperwork Reduction Act Submission Certification. Because the information collected for this reporting requirement is not used for statistical purposes, the Commission does not use as stated in item 19(i) "effective and efficient statistical survey methodology." The information collected is case specific to each respondent.

### **B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

This is not a collection of information employing statistical methods.

## ATTACHMENT A

### Notice of technical conference, agenda and opening remarks

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Issuance	20090630-3067	6/30/2009	6/30/2009	Notice of technical conferences re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090803-3055	8/3/2009	8/3/2009	Supplemental Notice of technical conference re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090807-3069	8/7/2009	8/7/2009	Errata Notice shortening due date for panelist registration re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090826-3011	8/26/2009	8/26/2009	Notice announcing panalists and final agenda for the 9/3/09 technical conference in Phoenix, Arizona re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090902-3017	9/2/2009	9/2/2009	Notice announcing panelists and final agenda for the September 10, 2009 Technical Conference in Atlanta, Georgia re the Transmission Planning Processes Under Order No 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090903-4011	9/3/2009	9/3/2009	ColumbiaGrid Opening Statement at the FERC September 3, 2009 Technical Conference Cost Allocation Panel under AD09-8.	<a href="#">Word</a>	-
Issuance	20090903-4012	9/3/2009	9/3/2009	NV Energy Presentation Notes at the September 3, 2009 Transmission Planning Process Under Order No 890 in Phoenix, Arizona under AD09-8.	<a href="#">PDF</a>	-
Issuance	20090903-4013	9/3/2009	9/3/2009	Federal Energy Regulatory Commission's 9/3/09 Regional Technical Conferences Assessing the Order No. 890 Planning Processes Phoenix, Arizona Technical Conference Panel 3-Cost Allocation etc under AD09-8.	<a href="#">Word</a>	-
Issuance	20090903-4014	9/3/2009	9/3/2009	Prepared Opening Remarks of Ronald Lehr on behalf of American Wind Energy Association and on behalf of Interwest Energy Alliance and Western Grid Group, for the September 3, 2009 technical conference in Phoenix, AZ, AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Issuance	20090903-4015	9/3/2009	9/3/2009	Prepared Opening Remarks of Tom Wray, Manager of Generation and Transmission, Southwestern Power and Project Manager for SunZia Southwest Transmission Project, for the September 3, 2009 technical conference in Phoenix, AZ, AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20090903-4016	9/3/2009	9/3/2009	Prepared Opening Remarks of Teresa Mogensen -? Director, Transmission Asset Management & Business Relations, Xcel Energy, for the September 3, 2009 technical conference in Phoenix, AZ under AD09-8.	<a href="#">Word</a>	-
Issuance	20090910-4018	9/10/2009	9/10/2009	Prepared Opening Remarks of Steve Gaw, Policy Director of the Wind Coalition, from September 10, 2009 Conference in Atlanta, GA under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Issuance	20090911-3060	9/11/2009	9/11/2009	Notice announcing panelists and final agenda for the 9/21/09 technical conference in Philadelphia, PA re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">_Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091001-4005	9/21/2009	10/1/2009	Prepared Opening Remarks of Dale Landgren on behalf of American Transmission Company, LLC, for the September 21, 2009 technical conference in Philadelphia, PA, under AD09-8.	<a href="#">PDF</a>	-
Submittal	20090921-4007	9/21/2009	9/21/2009	Prepared Opening Remarks of Maureen A Borkowski on behalf of the Midwest ISO Transmission Owners, from September 21, 2009 Conference in Philadelphia PA. under AD09-8.	<a href="#">_Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20090921-5077	9/21/2009	9/21/2009	Technical Conference Paper on Transmission Planning of PJM Interconnection, L.L.C. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20090923-5009	9/22/2009	9/23/2009	Prepared Opening Remarks of David A. Whiteley, Principal Member, Whiteley BPS Planning Ventures LLC under AD09-8.	<a href="#">PDF</a>	-

**ATTACHMENT B**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSIONTransmission Planning Processes  
Under Order No. 890

Docket No. AD09-8-000

## NOTICE OF REQUEST FOR COMMENTS

(October 8, 2009)

In Order No. 890, the Commission directed all transmission providers to develop a transmission planning process that satisfies nine principles and to clearly describe that process in a new attachment to their open access transmission tariffs.<sup>16</sup> On December 7, 2007, pursuant to Order No. 890, most public utility transmission providers and several non-public utility transmission owners submitted their proposed transmission planning processes.<sup>17</sup> The Commission subsequently addressed these filings in a series of orders that were issued throughout 2008. Generally, the Commission accepted each of the transmission planning processes to be effective December 7, 2007, subject to further compliance filings required to meet the nine planning principles the Commission outlined in Order No. 890 (Initial Planning Orders). The Commission also noted that its staff would periodically monitor the implementation of these processes, and it stated its intent to convene regional technical conferences in 2009 to assess them.

Earlier this year, the Commission issued a series of orders addressing the further transmission planning process compliance filings (Compliance Filing Orders). In each of the Compliance Filing Orders, the Commission stated that it remains interested in the development of transmission planning processes and will continue to examine the adequacy of the processes accepted to date. The Commission reiterated the encouragement made in prior orders for further refinements and improvements to the planning processes as transmission providers, their customers, and other stakeholders gain more experience through actual implementation of the processes. The Commission also restated that, as part of its ongoing evaluation of the implementation of the planning processes, it intended to convene regional technical conferences to determine if further refinements to these processes are necessary.

---

<sup>16</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241 at P 418-602, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299, (2008) *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009).

<sup>17</sup> A small number of transmission providers were granted extensions.

Consistent with the Compliance Filing Orders, Commission staff in September 2009 held three regional technical conferences to: (1) determine the progress and benefits realized by each transmission provider's transmission planning process, obtain customer and other stakeholder input, and discuss any areas that may need improvement; (2) examine whether existing transmission planning processes adequately consider needs and solutions on a regional or interconnection-wide basis to ensure adequate and reliable supplies at just and reasonable rates; and (3) explore whether existing processes are sufficient to meet emerging challenges to the transmission system, such as the development of inter-regional transmission facilities, the integration of large amounts of location-constrained generation, and the interconnection of distributed energy resources.

At the technical conferences, staff heard from a variety of industry and stakeholder representatives regarding the effectiveness of the current planning processes, the treatment of resources in the planning process, and the development of regional and inter-regional transmission plans. Speakers also addressed the effectiveness of existing cost allocation methods and alternatives thereto. As discussed further below, the Commission staff seeks comment regarding these issues.

#### *Enhancing Regional Transmission Planning Processes*

At the technical conferences, speakers generally supported the regional planning requirements in Order No. 890. However, some suggested that expansion of the transmission grid could be enhanced by increasing the amount of coordination that occurs across neighboring transmission systems. Under current transmission planning processes, there is no comprehensive structure in place to identify the optimal set of facilities that address needs that affect multiple systems. For example, transmission providers in certain parts of the country have organized sub-regional planning groups for the purpose of collectively developing plans for upgrades on their combined systems. These sub-regional transmission plans are then analyzed by regional reliability entities to ensure that, if implemented, they will be simultaneously feasible. However, there are limited processes in place to proactively analyze whether alternative solutions would more efficiently or effectively meet the needs identified in each of the individual transmission plans. This lack of coordinated planning over the seams of current planning regions could be needlessly increasing costs for customers of individual transmission providers or resulting in discrimination among potential users of the grid.

The Commission staff understands that some joint planning among neighboring transmission providers is being undertaken pursuant to bilateral agreements. In addition, transmission providers have put processes in place to respond to requests for economic planning studies that involve analysis of upgrades to resolve congestion or integrate new resources on a regional basis. Proposals to implement interconnection-wide planning

activities are also being developed in response to funding opportunities under the American Recovery and Reinvestment Act of 2009. It is not clear, however, whether these activities will result in a regular process for jointly identifying and evaluating alternatives to solutions identified in transmission plans developed through existing sub-regional and regional planning processes.

Moreover, there appears to be a lack of consistency across existing transmission planning processes regarding the treatment of certain types of resources. Planning transmission facilities necessary to meet state renewable resource requirements must be integrated with existing transmission planning processes that are based on metrics or tariff provisions focused on reliability or in some cases production cost savings. As a result, some areas are struggling with how to adequately address transmission expansion necessary to integrate renewable generation resources. In addition, in some areas merchant transmission developers choose to plan proposed facilities outside the transmission providers' planning processes. In other areas, when merchant transmission developers participate in the transmission planning process, they may lose their opportunity to construct to incumbent transmission owners through rights of first refusal. In some regions, there are transmission planning practices that disproportionately affect certain types of generation, such as resources developed by independent power producers. The interconnection queue process may serve as a further hindrance to the efficient planning of transmission investment. Finally, there does not appear to be a consistent way of treating demand resources, such as demand response and energy efficiency, in transmission planning activities.

The Commission staff seeks comment on these concerns. If commenters believe these concerns are unfounded, they should explain why that is so. By contrast, if commenters have practical examples of these concerns or others, they should provide them in their comments. All commenters should address whether additional reforms are necessary in these areas to ensure that the rates, terms and conditions of transmission service are just and reasonable or to otherwise eliminate remaining opportunities for undue discrimination in the provision of transmission service, including consideration of the following questions:

- o Are existing transmission planning processes adequate to identify and evaluate potential solutions to needs affecting the systems of multiple transmission providers? Should prospective transmission developers coordinate their projects in the interest of "right-sizing" facilities to make the best possible use of available corridors and minimize environmental impacts? If so, what process should govern the identification and selection of projects that affect multiple systems?

- Are there adequate opportunities for stakeholders to participate in planning activities that span different regions, including for example those undertaken pursuant to bilateral agreements?
- Is there adequate coordination among planning entities to provide consistency in the data, assumptions and models being used in planning activities?
- Will the interconnection-wide processes adopted pursuant to funding opportunities under the American Recovery and Reinvestment Act of 2009 result in an ongoing process for jointly identifying and evaluating alternatives to solutions identified in transmission plans developed through existing sub-regional and regional planning processes? Will the scope and function of these interconnection-wide planning activities be sufficient to help address the concerns identified above? How will planning activities conducted on an interconnection-wide basis be integrated into the development of sub-regional and regional transmission plans and vice versa?
- How are reliability impact studies aligned with economic-based evaluations of sub-regional or regional projects and assessments of projects needed to satisfy renewable energy standards? If not aligned, how can reliability assessments and economic evaluations be aligned in order to better identify options that meet regional needs?
- How should merchant and independent transmission projects be treated for purposes of regional transmission planning?
  - Should they be required to participate in the planning process and, if so, at what point must they engage in the planning process?
  - Do rights of first refusal for incumbent transmission owners unreasonably impede the development of merchant and independent transmission? If so, how can this impediment be addressed?
  - Are there other barriers to the development of merchant and independent transmission in the transmission planning process?
  - Should similar assumptions regarding resource availability be used for generation owned by the transmission owner and merchant or independent developers?
- Is the interconnection queue process hindering the ability to plan the transmission system to integrate new generation? Would any reforms to the Commission's interconnection procedures support efficient planning of the transmission system?
- Should there be consistency in the way transmission providers treat demand resources, such as demand response, energy efficiency and distributed storage, in

the transmission planning process? Are there preferred methods of modeling or otherwise accounting for demand resources in the planning process? Does the planning process investigate transmission needs at fine enough granularity to identify beneficial demand resource projects?

- o Are existing dispute resolution procedures in transmission provider tariffs adequate to address disputes that arise in the planning process?

### *Allocating the Cost of Transmission*

At the technical conferences, speakers identified a number of barriers to the expansion of transmission facilities necessary to accomplish the goals of ensuring the reliable operation of the grid, reducing congestion, and meeting renewable resource requirements. One such obstacle that speakers identified is the lack of mechanisms to allocate and recover the costs of certain types of new transmission facilities and upgrades to existing facilities. This is not a new problem, but it has become more acute as the need for transmission infrastructure has grown. The Electricity Advisory Committee has identified cost allocation as “the single largest impediment to any transmission development, especially across multiple [regional transmission organizations (RTOs)] or across RTO and non-RTO regions.”<sup>18</sup>

Constructing new transmission facilities requires a significant amount of capital. A threshold consideration for any company considering investing in transmission is whether it will have a reasonable opportunity to recover its costs. Determining the costs and benefits of adding transmission infrastructure to the grid is a complex process, particularly for projects that affect multiple systems and therefore may have multiple beneficiaries. At the same time, the expansion of regional power markets and the increasing adoption of renewable energy requirements have led to a growing need for transmission projects that cross multiple utility and RTO systems. There are few rate structures in place today that provide the allocation and recovery of costs for these inter-system projects, creating significant risk for developers that they will have no identified group of customers from which to recover the cost of their investment. The Commission staff also is aware that cost allocation within RTO regions, particularly those that encompass several states, is contentious and prone to litigation because it is difficult to reach an allocation of costs that is perceived as fair.

Indeed, the Commission staff has become aware, through the technical

---

<sup>18</sup> Electricity Advisory Committee, *Keeping the Lights On in a New World*, at 50 (Jan. 2009). The Electricity Advisory Committee was formed to provide advice to the Department of Energy in implementing the Energy Policy Act of 2005 and the Energy Independence and Security Act of 2007 and modernizing the nation’s electricity delivery infrastructure. It includes representatives from industry, academia, and state government.

conferences and other outreach, of several currently-proposed transmission projects that highlight the lack of a comprehensive solution to the problem of allocating and recovering the cost of transmission investment. While these projects likely face other hurdles, such as siting and other regulatory risk, many of them will not be able to move forward until they receive up-front certainty about their opportunity to recover the costs of their investment. Until then, the multiple beneficiaries of each project will have the incentive to defer investment in the hopes that others will value the line enough to fund it individually.

The Commission has taken a number of steps to encourage investment in new transmission facilities.<sup>19</sup> In Order No. 890, the Commission directed transmission providers to address the issue of cost allocation by identifying in their tariffs how the cost of new facilities not subject to existing rules would be allocated, consistent with several general principles.<sup>20</sup> The Commission also has addressed the specific cost allocation rules for new facilities and upgrades within RTO boundaries.<sup>21</sup> As a general matter, however, these proceedings have only established cost allocation mechanisms for projects within the footprint of a single RTO or transmission provider. Few mechanisms are in place to govern the allocation of costs for transmission projects that cross multiple systems.

The Commission's best remaining opportunity to eliminate barriers to new transmission construction may therefore be to provide greater certainty in its policies for allocating the cost of new transmission facilities, particularly for facilities that cross multiple transmission systems. The Commission staff therefore seeks comment on whether existing cost allocation practices may create a disincentive to invest in new transmission, and if so, how they might be changed. Staff also seeks comment on whether the Commission should pursue generic reform in the area of cost allocation, or rather should continue to address cost allocation issues as they arise on a case by case basis.

---

19 *E.g.*, *Promoting Transmission Investment through Pricing Reform*, Order No. 679, FERC Stats. & Regs. ¶ 31,222, *order on reh'g*, Order No. 679-A, FERC Stats. & Regs. ¶ 31,236 (2006), *order on reh'g*, 119 FERC ¶ 61,062 (2007); *Long-Term Firm Transmission Rights in Organized Electricity Markets*, Order No. 681, FERC Stats. & Regs. ¶ 31,226, *reh'g denied*, Order No. 681-A, 117 FERC ¶ 61,201 (2006); and Order No. 890.

20 See Order No. 890, FERC Stats. & Regs. ¶ 31,222 at P 559 ("First, we consider whether a cost allocation proposal fairly assigns costs among participants, including those who cause them to be incurred and those who otherwise benefit from them. Second, we consider whether a cost allocation proposal provides adequate incentives to construct new transmission. Third, we consider whether the proposal is generally supported by state authorities and participants across the region.").

21 See, *e.g.*, *Midwest Indep. Transmission Sys. Operator, Inc.*, 114 FERC ¶ 61,106 (2006), *order on technical conference, reh'g, clarification and compliance*, 117 FERC ¶ 61,241, *order on reh'g and clarification*, 118 FERC ¶ 61,208 (2007); *Midwest Indep. Transmission Sys. Operator, Inc.*, 118 FERC ¶ 61,209 (2007), *order on reh'g and compliance*, 120 FERC ¶ 61,080, *order on reh'g and compliance*, 122 FERC ¶ 61,127 (2008); *PJM Interconnection, L.L.C.*, Opinion No. 494, 119 FERC ¶ 61,063 (2007), *order on reh'g and compliance filing*, Opinion No. 494-A, 122 FERC ¶ 61,082 (2008), *remanded in part sub nom. Illinois Commerce Comm'n v. FERC*, 576 F.3d 470 (DC Cir. 2009).

If commenters believe these concerns are unfounded, they should explain why that is so. By contrast, if commenters have practical examples of these concerns or others, they should provide them in their comments. All commenters should address whether it is necessary to pursue generic reform in the area of cost allocation in order to ensure that the rates, terms and conditions of transmission service are just and reasonable or to otherwise eliminate remaining opportunities for undue discrimination in the provision of transmission service, including consideration of the following questions:

- To the extent that a lack of up-front certainty about cost allocation is inhibiting transmission development, describe the relative impact of this concern on specific projects and as it relates to other impediments to development.
- Should processes be established to help stakeholders address cost allocation matters over larger geographic regions? What is an appropriate scope for those regions? Should they align with the regions for which planning is conducted?
- Are there regional cost allocation methodologies outside RTOs, and broader regional cost allocation within RTOs, that should be considered or established? If so, how should this be done?
- Should each transmission provider hold an open season solicitation of interest for needed transmission projects identified through the transmission planning process in order to assist in cost allocation determinations?
- How can the customers that benefit from a particular facility be determined? Is there a preferred method? Should the method vary depending on the nature of the facility?
- Should costs for base upgrades needed for existing reliability or economics be allocated differently than excess capacity expected to be needed for later-developed resources? Should the allocation of costs for certain projects take into account the risk of under-subscribed “right sized” lines? If so, how should costs be re-allocated over time as such lines become subscribed by new customers?
- Should cost allocation mechanisms continue to differ based on whether a project is deemed necessary based on reliability and adherence to approved reliability standards versus economic considerations?
- Should the determination of beneficiaries of a transmission facility include generators as well as loads?

- o Should benefits be recalculated over time? Would recalculations negatively affect usage decisions?
- o How should non-quantifiable costs or benefits be identified, factored in or otherwise weighted?

Persons wishing to comment on the matters discussed above should submit comments to the Commission no later than November 9, 2009. Reply comments should be submitted by December 4, 2009.

Nathaniel J. Davis, Sr.,  
Deputy Secretary.

## ATTACHMENT C

### Comments received in response to the notice of request for comments

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Issuance	20091008-3022	10/8/2009	10/8/2009	Notice of request for comments re Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091009-5016	10/9/2009	10/9/2009	Comments of Kansas Rep. Tom Sloan on Transmission Planning Processes under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091026-0266	10/9/2009	10/9/2009	Kansas Representative Tom Sloan provides comments on the current transmission planning processes under AD09-8.	<a href="#">Image</a>	-
Submittal	20091013-5069	10/12/2009	10/13/2009	Comments of CALifornians for Renewable Energy, Inc. under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091013-5295	10/13/2009	10/13/2009	Copy of letter to the California ISO submitted by The Nevada Hydro Company, Inc. under AD09-8, in response to the October 8 Request for Comments describing specific issues of concern of one independent transmission provider trying to enter the CAISO.	<a href="#">PDF</a>	-
Submittal	20091013-5333	10/13/2009	10/13/2009	Copy of letter to the California ISO submitted by The Nevada Hydro Company, Inc. in response to the October 8 Request for Comments describing specific issues of concern of one independent transmission provider trying to enter the CAISO under AD09-8 et al.	<a href="#">PDF</a>	<a href="#">PDF</a>
Submittal	20091015-5000	10/14/2009	10/15/2009	Comment of The Nevada Hydro Company, in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091015-5001	10/14/2009	10/15/2009	Comments of The Nevada Hydro Company AD09-8.	<a href="#">PDF</a>	-
Submittal	20091015-5065	10/15/2009	10/15/2009	ISO New England Inc. Opening Remarks of Steven Rourke at 9/21/09 Regional Technical Conference under AD09-8.	<a href="#">PDF</a>	-
Issuance	20091109-0018	10/28/2009	10/28/2009	Response to Kansas House of Representatives Tom Sloan 10/9/09 letter commenting on the current state of the transmission planning processes under AD09-8.	<a href="#">Image</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091028-5055	10/28/2009	10/28/2009	(doc-less) Motion to Intervene of Public Utilities Commission of Ohio under AD09-8.	<a href="#">Text</a>	-
Submittal	20091029-5072	10/29/2009	10/29/2009	Motion of EEI to Extend Period for Filing Comments under AD09-8.	<a href="#">PDF</a>	-
Issuance	20091030-3050	10/30/2009	10/30/2009	Notice granting extension of time re Transmission Planning Processes under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091030-5015	10/30/2009	10/30/2009	Comments of New York Independent System Operator Inc in Support of the Edison Electric Institute's Motion for Extension of Time under AD09-8.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091109-5121	11/9/2009	11/9/2009	E.ON U.S.'s response to FERC Staff's questions on regional transmission planning under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091109-5123	11/9/2009	11/9/2009	Comments of The Dayton Power and Light Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091109-5124	11/9/2009	11/9/2009	Comment of Public Power Council under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091109-5129	11/9/2009	11/9/2009	Comments of San Diego Gas & Electric Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091110-4001	11/10/2009	11/10/2009	Response to FERC's request for Comments concerning the status of the transmission planning process under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091112-5212	11/12/2009	11/12/2009	Comment of Conservation Law Foundation and others under AD09-8, regarding framework for regional and national electricity grid planning to support clean, renewable energy development, energy efficiency and demand response.	<a href="#">PDF</a>	-
Submittal	20091125-0012	11/17/2009	11/24/2009	Comments of Peter C Luchsinger MD re the Transmission Planning Processes under AD09-8.	<a href="#">Image</a>	-
Submittal	20091202-0035	11/20/2009	11/30/2009	Comments of NationalWind re transmission planning and development under AD09-8.	<a href="#">Image</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091123-5006	11/20/2009	11/23/2009	Initial comments of the American Public Power Association, filed November 20, 2009 (transmission planning processes under Order No. 890). under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091120-5047	11/20/2009	11/20/2009	INITIAL COMMENTS OF 3M COMPANY, HIGH CAPACITY CONDUCTORS under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091120-5128	11/20/2009	11/20/2009	Comments of Public Utilities Commission of Ohio under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091124-5000	11/23/2009	11/24/2009	Attachments to comments of Edison Electric Institute under AD09-8.	<a href="#">PDF</a>	<a href="#">PDF</a>
Submittal	20091124-5002	11/23/2009	11/24/2009	Comments of NextEra Energy Resources, LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091124-5004	11/23/2009	11/24/2009	Comments of ENE (Environment Northeast) under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091124-5007	11/23/2009	11/24/2009	Notice of Intervention and Comments of California Public Utilities Commission under AD09-8.	<a href="#">Word</a>	<a href="#">Word</a>
Submittal	20091124-5033	11/23/2009	11/24/2009	Supplemental Information of AREVA T&D, Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5024	11/23/2009	11/23/2009	Initial Comments of Florida Transmission Providers under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5032	11/23/2009	11/23/2009	Comment of Duke Energy Corporation under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091123-5034	11/23/2009	11/23/2009	Comments of RRI Energy, Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5039	11/23/2009	11/23/2009	Initial Comments of Pattern Transmission LP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5041	11/23/2009	11/23/2009	Comments of Trans-Elect Development Company, LLC on Behalf of the Atlantic Wind Connection under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5043	11/23/2009	11/23/2009	Comments of Exelon Corporation under AD09-	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
				8.		
Submittal	20091123-5044	11/23/2009	11/23/2009	Comments of the AMERICAN ANTITRUST INSTITUTE re: Transmission Planning Processes Under Order No. 890 under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5051	11/23/2009	11/23/2009	Comments of National Nuclear Security Administration Service Center in Albuquerque, NM under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5053	11/23/2009	11/23/2009	Comments of BP Energy Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5054	11/23/2009	11/23/2009	Comment of Baltimore Gas and Electric Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5055	11/23/2009	11/23/2009	Comments of Progress Energy, Inc. in Response to Notice of Reuquest for Comments under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5070	11/23/2009	11/23/2009	Comment of SRP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5081	11/23/2009	11/23/2009	COMMENTS OF ALLEGHENY POWER AND TRANS-ALLEGHENY INTERSTATE LINE COMPANY UNDER AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5092	11/23/2009	11/23/2009	Post-Conference Comments of the Electric Power Supply Association under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5093	11/23/2009	11/23/2009	Comments of The Bay Area Municipal Transmission Group in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5096	11/23/2009	11/23/2009	Comments of Southwest Power Pool, Inc. Regarding Transmission Planning Processes Under Order No. 890 in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5101	11/23/2009	11/23/2009	Comment of National Rural Electric Cooperative Association under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5102	11/23/2009	11/23/2009	Comments of the Transmission Agency of Northern California in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5103	11/23/2009	11/23/2009	Initial Comments of E.ON Climate & Renewables North America Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5109	11/23/2009	11/23/2009	Comments of New England Power Pool Participants Committee under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5111	11/23/2009	11/23/2009	Comments of the EIPC in response to October 8, 2009 Notice under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5113	11/23/2009	11/23/2009	Comments of the NYISO in response to October 8, 2009 Notice under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5114	11/23/2009	11/23/2009	Comment of ColumbiaGrid under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5115	11/23/2009	11/23/2009	Initial Comments Of The Large Public Power Council under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5117	11/23/2009	11/23/2009	Comments of Cottonwood Energy Company LP, Dogwood Energy LLC, and Magnolia Energy LP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5128	11/23/2009	11/23/2009	Comments of Northeast Utilities Service Company regarding issues discussed at the Commission's three Regional Technical Conferences Assessing the Order No. 890 Planning Process under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5129	11/23/2009	11/23/2009	Comment of Organization of MISO States under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5131	11/23/2009	11/23/2009	Comment of WestConnect under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5132	11/23/2009	11/23/2009	Supplemental Initial Comments of PJM Interconnection, L.L.C. under AD09-8.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091123-5133	11/23/2009	11/23/2009	Comment of Dominion Resources Services, Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5134	11/23/2009	11/23/2009	Southern California Edison Company's Comments in Response to Request for Comments under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5145	11/23/2009	11/23/2009	Comment of American Electric Power Service Corporation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5146	11/23/2009	11/23/2009	Comments of Renewable Energy Systems Americas Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5149	11/23/2009	11/23/2009	Comments of Entergy Services in Response to Notice of Request for Comments. AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5150	11/23/2009	11/23/2009	Comments of ISO New England Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5151	11/23/2009	11/23/2009	Comment of American Forest & Paper Association under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5152	11/23/2009	11/23/2009	Comment of Transmission Dependent Utility Systems under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5153	11/23/2009	11/23/2009	Comment of Great River Energy under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091123-5154	11/23/2009	11/23/2009	Comments of Transmission Access Policy Study Group under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5157	11/23/2009	11/23/2009	Post-Technical Conference Comments Of The Midwest ISO Transmission Owners under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5158	11/23/2009	11/23/2009	Initial Comments of Southern Company Services, Inc. under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091123-5166	11/23/2009	11/23/2009	Comments of American Transmission Company LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5169	11/23/2009	11/23/2009	Comment of Green Energy Express, LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5172	11/23/2009	11/23/2009	Comment of New England States Committee on Electricity under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5173	11/23/2009	11/23/2009	Comments of PPL Electric Utilities Corporation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5176	11/23/2009	11/23/2009	Comment of IMPERIAL IRRIGATION DISTRICT (CA) under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5177	11/23/2009	11/23/2009	Comment of National Association of Regulatory Utility Commissioners under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5178	11/23/2009	11/23/2009	Comment of NRG Energy, Inc under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5179	11/23/2009	11/23/2009	Comment of Pacific Gas and Electric Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5180	11/23/2009	11/23/2009	Comments of the Delaware Municipal Electric Corporation, Inc., and the Southwestern Electric Cooperative, Inc. under AD09-8	<a href="#">PDF</a>	-
Submittal	20091123-5181	11/23/2009	11/23/2009	Comments of Maine Public Utilities Commission and the Maine Office of the Public Advocate under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5182	11/23/2009	11/23/2009	Initial Comments of Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc. under AD09-8.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091123-5183	11/23/2009	11/23/2009	Initial Comments of the Coalition to Advance Renewable Energy Through Bulk Storage under AD09-8	<a href="#">PDF</a>	-
Submittal	20091123-5184	11/23/2009	11/23/2009	Comments of Midwest Independent Transmission System Operator, Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5185	11/23/2009	11/23/2009	Notice of Intervention and Comments of the New York State Public Service Commission under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5186	11/23/2009	11/23/2009	Response to Data Request of ENERGY CONSULTING GROUP under AD09-8.	<a href="#">Word</a>	-
Submittal	20091123-5187	11/23/2009	11/23/2009	Comment of Massachusetts Attorney General under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5188	11/23/2009	11/23/2009	Comments of Upper Great Plains Transmission Coalition under AD09-8.	<a href="#">Word</a>	-
Submittal	20091123-5189	11/23/2009	11/23/2009	Integrus Companies' Comments on Regional Transmission Planning and Cost Allocation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5190	11/23/2009	11/23/2009	Comment of Sunflower Electric Power Corporation, et. al. under AD09-8.	<a href="#">Word</a>	-
Submittal	20091123-5191	11/23/2009	11/23/2009	Comments of Old Dominion Electric Cooperative under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5192	11/23/2009	11/23/2009	Comments of Starwood Energy Group Global, L.L.C. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091123-5193	11/23/2009	11/23/2009	Motion to Intervene of the FirstEnergy Affiliates under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5194	11/23/2009	11/23/2009	Comment of South Carolina Electric & Gas Transmission under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5195	11/23/2009	11/23/2009	Comment of American Wind Energy Association under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5196	11/23/2009	11/23/2009	Comment of PHI COMPANIES on the transmission planning processes under Order No. 890 under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5197	11/23/2009	11/23/2009	Comments of Chinook Power Transmission, LLC and Zephyr Power Transmission, LLC under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5198	11/23/2009	11/23/2009	Comment of the Bonneville Power Administration under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5199	11/23/2009	11/23/2009	Comment of MIDAMERICAN ENERGY HOLDINGS COMPANY under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5200	11/23/2009	11/23/2009	Comment of ITC Holdings Corp. under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5201	11/23/2009	11/23/2009	Initial Comments of WIRES under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5202	11/23/2009	11/23/2009	Comments of the PSEG Companies under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5203	11/23/2009	11/23/2009	Initial Comments of the California Independent System Operator Corporation under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5204	11/23/2009	11/23/2009	Comment of Electricity Consumer Resources Council under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5205	11/23/2009	11/23/2009	Comments of the California Department of Water Resources State Water Project under AD09-8-000.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091123-5206	11/23/2009	11/23/2009	Comments of The Energy Future Coalition under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5207	11/23/2009	11/23/2009	Comments of National Grid USA under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5208	11/23/2009	11/23/2009	Comments of Massachusetts Department of Public Utilities and Massachusetts Department of Energy Resources in Docket AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5209	11/23/2009	11/23/2009	Comment of Edison Electric Institute under AD09-8-000. (see attachment under 20091124--5000)	<a href="#">PDF</a>	-
Submittal	20091123-5210	11/23/2009	11/23/2009	Comments of the Northern Tier Transmission Group (NTTG) under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5211	11/23/2009	11/23/2009	Comment of Xcel Energy Services Inc. under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5212	11/23/2009	11/23/2009	Initial Comments of Public Interest Organizations & Renewable Energy Groups under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5213	11/23/2009	11/23/2009	Comment of Western Electricity Coordinating Council under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5214	11/23/2009	11/23/2009	Initial Comments of Pioneer Transmission, LLC under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5215	11/23/2009	11/23/2009	Comment of LS Power Transmission, LLC under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-5216	11/23/2009	11/23/2009	Comments of The Solar Energy Industries Association under AD09-8-000.	<a href="#">PDF</a>	-
Submittal	20091123-0193	11/24/2009	11/24/2009	Comments of Barbara Luchsinger re the transmission planning processes under AD09-8.	<a href="#">Image</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091124-4001	11/24/2009	11/24/2009	Post-Conference Comments of Independent Power Producers Coalition - West (IPPC-W) re Transmission Planning Processess under Order No 890 under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091124-5054	11/24/2009	11/24/2009	Comments of Illinois Commerce Commission under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091125-5119	11/25/2009	11/25/2009	Comments of The Governors of Delaware, Maryland, Virginia and New Jersey under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091130-5089	11/30/2009	11/30/2009	Comment of New Jersey Board of Public Utilities under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091204-4004	12/4/2009	12/4/2009	Reply Comments of the Federal Trade Commission under AD09-8. (replaces 20091204-5021)	<a href="#">PDF</a>	-
Submittal	20091204-5097	12/4/2009	12/4/2009	Comments of Clean Line Energy Partners, LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091208-5004	12/7/2009	12/8/2009	Comments of Idaho Public Utilities Commission, et. al. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091216-5085	12/16/2009	12/16/2009	Reply Comments of the Illinois Commerce Commission under FERC Docket No. AD09-8.	<a href="#">PDF</a>	-
Submittal	20091217-5063	12/17/2009	12/17/2009	Reply Comments of the Bay Area Municipal Transmission Group under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091221-5070	12/18/2009	12/21/2009	Reply Comments of California Public Utilities Commission under AD09-8.	<a href="#">Word</a>	<a href="#">Word</a>
Submittal	20091218-5019	12/18/2009	12/18/2009	Transmission Planning Process Under Order 890 Reply Comments of Baltimore Gas and Electric Company under AD09-8.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091218-5028	12/18/2009	12/18/2009	Reply Comments of Northeast Utilities Service Company Re Transmission Planning Processes Under Order No. 890 - AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5037	12/18/2009	12/18/2009	Reply comments of the American Public Power Association filed December 18, 2009 regarding the effectiveness of current transmission planning processes under FERC Order 890 under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5056	12/18/2009	12/18/2009	Reply Comments of Georgia Transmission Corporation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5069	12/18/2009	12/18/2009	Comment of Startrans IO, L.L.C. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5082	12/18/2009	12/18/2009	Reply Comments of Pattern Transmission LP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5091	12/18/2009	12/18/2009	Reply Comments of San Diego Gas & Electric Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5101	12/18/2009	12/18/2009	Southern California Edison (SCE) Company Submits Reply Comments under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5103	12/18/2009	12/18/2009	Reply Comments of the Electricity Consumers Resource Council (ELCON) under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5117	12/18/2009	12/18/2009	Comments of BRATTLE GROUP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5132	12/18/2009	12/18/2009	Reply Comments of Old Dominion Electric Cooperative under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5134	12/18/2009	12/18/2009	Reply Comments of Southern Company Services, Inc. under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091218-5135	12/18/2009	12/18/2009	Reply Comments of Ameren Services Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5136	12/18/2009	12/18/2009	Reply comments of Alabama Public Service Commission under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5145	12/18/2009	12/18/2009	Reply Comments on Order 890 Transmission Planning Process of the California Independent System Operator Corporation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5146	12/18/2009	12/18/2009	Comment of Transmission Access Policy Study Group under AD09-80.	<a href="#">PDF</a>	-
Submittal	20091218-5148	12/18/2009	12/18/2009	Reply Comments of MEAG Power under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5149	12/18/2009	12/18/2009	Reply Comments of the Maine Public Utilities Commission and the Maine Office of the Public Advocate under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5152	12/18/2009	12/18/2009	Reply Comments of NextEra Energy Resources, LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5153	12/18/2009	12/18/2009	Reply Comments of the Bonneville Power Administration under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5154	12/18/2009	12/18/2009	Reply Comments of PJM Interconnection, L.L.C. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5155	12/18/2009	12/18/2009	Reply Comments of New England States Committee on Electricity under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5156	12/18/2009	12/18/2009	Reply Comments of Southwest Power Pool, Inc. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5157	12/18/2009	12/18/2009	Reply Comments of the MIDWEST ISO TRANSMISSION OWNERS under AD09-8.	<a href="#">PDF</a>	-

<u>Category</u>	<u>Accession</u>	<u>Doc Date</u>	<u>Filed Date</u>	<u>Description</u>	<u>Files</u>	<u>Files</u>
Submittal	20091218-5161	12/18/2009	12/18/2009	Reply Comments of the Delaware Municipal Electric Corporation, Inc. and the Southwestern Electric Cooperative, Inc. in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5166	12/18/2009	12/18/2009	Reply Comments of American Electric Power Service Corporation under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5169	12/18/2009	12/18/2009	Reply Comments of Entergy Services In Response to Notice of Request for Comments under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5171	12/18/2009	12/18/2009	REPLY COMMENTS OF GREEN ENERGY EXPRESS LLC, TRANSMISSION TECHNOLOGY SOLUTIONS LLC, SOUTHWESTERN POWER GROUP II, LLC, THE NEVADA HYDRO COMPANY, LS POWER TRANSMISSION, LLC AND PATTERN TRANSMISSION LP under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5173	12/18/2009	12/18/2009	Reply Comments of the California Department of Water Resources State Water Project under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5182	12/18/2009	12/18/2009	Comment of New England Clean Energy Council concerning "transmission superhighway" from Midwest to Northeast. under AD09-8.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>
Submittal	20091218-5186	12/18/2009	12/18/2009	Reply Comments of ITC Holdings Corp. under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5190	12/18/2009	12/18/2009	Reply Comments of National Grid USA under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5192	12/18/2009	12/18/2009	Reply Comments of Pacific Gas and Electric Company under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5193	12/18/2009	12/18/2009	Comment of Transmission Dependent Utility Systems under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5194	12/18/2009	12/18/2009	Reply Comments of the Modesto Irrigation District in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5196	12/18/2009	12/18/2009	Reply Comments of the Transmission Agency of Northern California in AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5204	12/18/2009	12/18/2009	Reply Comments of Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., and Long Island Power Authority under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5205	12/18/2009	12/18/2009	Comment of Large Public Power Council under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091218-5219	12/18/2009	12/18/2009	Post Conference Comments of Independent Power Producers Coalition - West under AD09-8 Reply comments in Docket No. AD09-8-000	<a href="#">PDF</a>	-
Submittal	20091218-5223	12/18/2009	12/18/2009	Reply Comments of LS Power Transmission, LLC under AD09-8.	<a href="#">PDF</a>	-
Submittal	20091221-5092	12/21/2009	12/21/2009	Reply Comments of Public Interest Organizations under AD09-8-000.	<a href="#">Word</a>	<a href="#">FERC Generated PDF</a>

