

# FERC Order 1000: Transmission Planning & Cost Allocation

John P Buechler
NYISO Executive Regulatory Policy Advisor

Joint IPTF/ESPWG Meeting

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#### **Overview**

- Review of Compliance Issues Matrix
  - LS Power Comments
  - Other Comments?
- Review of Draft Northeast Planning Protocol
  - NGrid Comments
  - NYTO Comments
  - Public Interest Comments
  - Other Comments?
- Schedule/Topics for Future Meetings
  - Regional Topics
  - Inter-Regional Topics



### **Compliance Issues Matrix**

- LS Power Comments
  - Non-Incumbent Provisions
  - Evaluation Process
  - Selection Process
  - CARIS Beneficiary Voting Requirement
  - Transparency
  - Other Clarifications
- Other Comments??



#### **Northeast Protocol**

- NYTO Comments
  - Draft Protocol "...generally covers the requirements of Order 1000..." but is "light on the details"
    - Should include details on the type of transmission studies to identify transmission facilities that are "more efficient or cost effective" than regional facilities
    - Procedures to identify and resolve differences in data assumptions and models need to be described
    - Additional specificity needed on the process for identifying and evaluating interregional projects
    - Additional detail needed on the requirement to maintain a website and e-mail list for communications
  - ISO/RTOs & TO's will need to develop an interregional cost allocation process
  - NYTOs request an additional 2 weeks to provide further comments



#### Northeast Protocol (Cont'd)

- NGrid Comments
  - Supports the objectives of Order 1000 to further enhance inter-regional planning
  - Draft revisions "...correctly identify issues..."
  - Insufficient detail is provided
    - Joint Evaluation Procedures
    - How to determine "relative efficiency and costeffectiveness"
  - Coordination with States is a critical element
  - Cost Allocation
    - TOs' rights
    - NGrid will work together with ISOs/RTOs and other TOs



#### Northeast Protocol (Cont'd)

- Public Interest Comments
  - Adopt a "best practices" approach to inter-regional planning
    - Harmonize planning practices among the three regions
    - E.g. Methodologies for consideration of energy efficiency and demand response in load forecasts

**OR...** 

- Explain the basis for using different approaches
- Benefit Metrics
  - Need a clear methodology for cost allocation based on a "robust set of benefit metrics" derived from all three regions
  - Support evaluation of facilities located in solely in one region that produce benefits for both regions (although not required by Order 1000)



#### Northeast Protocol (Cont'd)

- Public Interest Comments (Cont'd)
  - Comments on NCSP related to Order 1000:
    - "Northeast ISO/RTOs existing reliability and economic planning processes are already largely compliant with Order 1000."
      - Premature comment
    - "Interregional planning process is not required to fully comply with Order 890's Planning Principles"
      - Explain this statement

Other Comments??



## Future Joint Meetings: Regional Topics

5/31 Public Policy Requirements: Strawman

Non-Incumbents

6/26 Draft Tariff Revisions: Regional Issues

**Public Policy Requirements** 

7/10 Draft Tariff Revisions

**Public Policy Requirements** 

7/24 Draft Tariff Revsions

8/6 Draft Tariff Revisions: Finalize

8/15-16 Review with BIC/OC

8/28 Draft Tariff Revisions: Finalize

9/18 NYISO Board Approval

9/24 Status Update

10/11 Regional Issues Filing Due at FERC



# Future Joint Meetings: Inter-regional Topics

5/31 --

6/26 Inter-regional Cost Allocation

7/10 ---

7/24 Draft Northeast Protocol

8/6 Inter-regional Cost Allocation

8/15-16 Not Applicable

8/28 Draft Northeast Protocol

9/18 Not Applicable

9/24 Inter-regional Cost Allocation

10/12-2/13 TBD

4/11/13 Inter-Regional Issues Filing Due at FERC



### **Compliance Schedule**

- Effective Date of Final Rule
  - Due 60 days from publication in Federal Register Oct 11, 2011
- Compliance filing is required on everything except interregional planning and cost allocation
  - Due 12 months from Effective Date of Final Rule Oct 11, 2012
- Compliance filing on interregional planning & cost allocation
  - Due 18 months from Effective Date of Final Rule April 11, 2013
- Final Rule's requirements will apply only to "new transmission facilities"
  - After the Effective Date of the compliance filings (e.g. after FERC Approval)



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