

# Preliminary Comments on SPP's Planning "Strawman Proposal"

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# Overall Comments

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- In general, SPP committee processes are well-formulated and constructively administered.
  - Stakeholders are encouraged to contribute to committee work.
  - Effort is expended to find workable solutions that will gain wide acceptance.
  - Number and scope of controversies are reduced when filings are made.

## Overall Comments (cont'd)

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- ❑ SPP planning strawman appears aimed at enhancing stakeholder participation in the planning process.
- ❑ SPP should be commended for suggesting further enhancements.
- ❑ The hard part:
  - translate commitments into concrete actions, and
  - avoid “backsliding” over the long term.

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# Specific Comments on the SPP Strawman

# Coordination

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- SPP suggests opportunity for more stakeholder input on TO approaches to local planning problems. SPP will “facilitate.” (p.2)
  - Generally, this is a useful suggestion.
  - SPP may need to be more than a “facilitator.”
  - SPP should make the “call” if a TO and its stakeholders reach impasse.

- SPP proposes more formal arrangement for planning studies with neighbors. (p.3)
  - We support this proposal.
  - SPP mentions Entergy, ERCOT, Nebraska parties. Should Cleco be on the list, too?

# Transparency

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- SPP proposes more transparency for TO-specific planning criteria (p.6)
  - Constructive proposal, but it highlights a more basic issue: interplay between TO “local” planning and SPP RTO-wide planning.
  - Some stakeholders still have the perception that SPP simply “rolls up” TO expansion plans.

- SPP should document and clarify:
  - role of TO planning and criteria in the RTO planning process
  - the manner in which upgrades indicated by a TO's "more stringent criteria" are incorporated into the overall RTO-wide plan.

# Comparability

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- SPP proposes “consistent interpretation” by TOs of SPP planning criteria” (p.8)
  - Although SPP’s goal is constructive, a more basic question arises: Why are TOs interpreting SPP’s planning criteria?
  - SPP RTO should be interpreting and applying its own criteria.

- SPP will provide oversight to ensure individual TO criteria are applied even-handedly (p.18 n.2, and p.22)
  - What form will this oversight take?
  - What if SPP sees a problem? What recourse?
  - Will SPP refuse to incorporate an upgrade in the regional plan that it believes results from unfair application?

# Economic Planning

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- SPP discusses identification of “high priority economic planning studies” (p. 27)
  - Is this a once-a-year chance for stakeholders to request analysis of an economic upgrade?
  - Can a request be initiated by a customer during the year?

# Intra-year TEP Modifications

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- SPP discusses process by which TEP can be modified during the year. (p.20)
  - What sort of events might trigger such a change?
  - Who can propose a change? What is the process for approval?
  - Is there an impact threshold for proposing a change?