

**Arkansas Electric Cooperative Corporations’s Preliminary Comments on Entergy’s  
Order No. 890 Planning Strawman**

**General Comments**

More technical conferences are needed. There simply was not sufficient time between the publication of strawmen and this meeting for many stakeholders to develop well thought-out views of them and prepare meaningful comments.

Part of the difficulty of evaluating these strawmen results from the fact that OASIS sites are still not adequately indexed so that people who are not reserving transmission on a daily basis know where everything is. As a consequence, people are having trouble matching up the strawman proposals and claims with existing processes and data.

Entergy’s strawman doesn’t appear integrate the planning processes employed in providing generation interconnections, transmission service (especially long-term transmission service) and reliability planning. If Order 890 doesn’t require this, the Commission should consider doing so.

At many points in the emerging ICT process customers’ questions are met with claims of confidentiality. This has got to be dealt with.

**Behind the strawman: Why the ICT contract is not a substitute for open planning under Order 890.**

Almost any question you ask the ICT is answered, “We’ll have to check with Entergy.”

It appears that Entergy is not bound by the ICT’s plan. Entergy has veto power over the ICT, and therefore, the ICT’s plan may end up being a bunch of paper on a shelf.

Specifically, the ICT’s Base Plan seems completely divorced from Entergy’s Construction Plan. Entergy doesn’t have to build anything that the ICT says needs to be built. The ICT’s Base Plan seems mostly to concern itself with pricing projects that Entergy decides to build. So what results is two parallel planning processes and plans, only one of which is certain to be implemented—Entergy’s.

**Coordination.**

- ICT uses data provided by Entergy to develop Base Case model (p. 2). No indication how that data is gathered and processed before inclusion in ICT model. Specifically, no way to verify that ICT is being provided correct data regarding stakeholder loads and resources.
- ICT and Entergy will participate in regional model development process for SERC region (p. 2). No explanation of how LSE customers will be included in that process.

- Re the “Construction Plan” (p. 3). Strawman glosses over fact that pursuant to Planning Protocol (Section 6.1), “the Transmission Provider [in this case, Entergy] will develop the Construction Plan, which will contain all transmission upgrade projects on the Transmission System that are necessary to satisfy the Planning Criteria.” In other words, LSE customers have no input into the Construction Plan. Specifically, LSEs have no means of assuring that projects actually required to provide reliable service are included in the Construction Plan.
- Annual transmission summit (p. 3) , which appears to occur after Entergy’s development of its Construction Plan, is not a substitute for participation in the development of that crucial plan. Stakeholder committees which meet more frequently only participate in development of the ICT’s Base Plan. This process appears to be backwards, compared, for example, with the SPP process.

### **Transparency**

- Strawman doesn’t provide for disclosure of criteria for inclusion of projects in the Construction Plan. We believe projects are ranked on the basis of costs and benefits to Entergy (and no one else). Even more important, stakeholders need to be included in the *development* of such criteria, and they need to be applied by the ICT, not Entergy,
- Strawman does not specify in what form the power flow models, etc. (p. 6) will be disclosed. Will customers be able to replicate results of planning studies? (Order No. 890, P 471) Can’t tell from strawman.
- Strawman does not address whether Entergy’s disclosure includes an explanation for the basis for generator dispatch. (per Order No. 890, P 478).

### **Comparability**

- Entergy states that its Planning Protocol provides that the ICT will conduct transmission planning on a non-discriminatory basis (p. 8). However, strawman fails to explain how customers will be able to know whether they are being treated comparably with similarly situated customers.

### **Dispute Resolution**

- The dispute resolution process described (pp. 8-9) does not address how disputes about whether Entergy/ICT is planning for customers in a comparable manner will be addressed. Instead, the dispute resolution process is geared toward (i) disputes between Entergy and the ICT and (ii) disputes

between customers and Entergy/ICT over specific transmission requests (pp. 9-11).

### **Regional Participation**

- Entergy indicates that it believes SERC is the appropriate “broader region” in which it will conduct regional planning (p. 12) and gives short shrift to SPP. The regional planning to be conducted with SPP is limited to the ICT’s “identifying any opportunities for regional optimization” of Entergy’s construction plan with those of individual SPP transmission owners and Entergy’s being a “liaison member” on SPP’s Transmission Working Group (p. 12). That is woefully inadequate.
- Coordination across the Entergy-SPP seam is essential to AECC. Entergy’s and SPP’s models need to be synchronized and coordinated.

### **Economic Studies**

- Entergy’s strawman does not yet address the requirement to give stakeholders the right to request a defined number of “high priority” studies annually, the cost of which will be recovered as part of the overall pro forma OATT cost of service (P 547). Entergy notes it will work with the ICT to address this (p. 14-15) though does not indicate that it will work with stakeholders to do so.