

# New England Transmission Planning - The PTOs' Perspective

FERC Order 890 Technical Conference

Pittsburgh

June 28, 2007

# Who are the PTOs?

- The PTOs are Participating Transmission Owners under the New England RTO, consisting of 10 utilities and 12 publicly-owned municipal entities.
- As the RTO, ISO-NE is authorized by FERC to exercise operating and planning authority over the PTOs' transmission facilities, including provision of transmission service under the ISO-NE OATT.
- Under the Transmission Operating Agreement, PTOs:
  - Retain authority under Section 205 of the FPA to set transmission rates; and
  - Are subject to an obligation to build new transmission facilities.
- Actively participating in the 890 compliance process.

# The Final Rule

- *“In order for an RTO’s or ISO’s planning process to be open and transparent, transmission customers and stakeholders must be able to participate in each underlying transmission owner’s planning process. This is important because, in many cases, RTO planning processes may focus principally on regional problems and solutions, not local planning issues that may be addressed by individual transmission owners. These local planning issues, however, may be critically important to transmission customers... [Therefore] individual TOs must, to the extent that they perform transmission planning within an RTO or ISO, comply with the Final Rule as well. ....Accordingly, as part of their compliance filing RTOs and ISOs must indicate how all participating transmission owners within their footprint will comply with the planning requirement in the Final Rule.”  
(P440)*

# Key Issues for Local Planning

- Planning for Local and Non-PTF Tx facilities must be subjected to a coordinated, periodic, open and transparent regional stakeholder process that:
  - Facilitates communication between transmission providers, their transmission providing neighbors, state authorities, customers and other stakeholders (P 452);
  - Include full public disclosure and status of Tx plans consistent with confidentiality of customer information (See Transparency);
  - Meets specific service requests of Tx customers and treats similarly-situated customers comparably (P494);
  - Addresses qualified demand resources (P 479);
  - Establish uniform system for submittal of Tx Customer load forecast information (P 486-87); and
  - Applies both economic and reliability considerations (P 542).

# A Review of New England's Current Planning Process

- The I.3.9. process reviews proposed changes in capacity for both regional and local transmission facilities rated at 69 kV or above.
- Even though it's a transparent process, the I.3.9. process occurs after transmission planning has already taken place.
- The RSP process already generally conforms with the Commission's planning criteria.
- The RSP's Planning Advisory Committee (PAC) process already provides for open, transparent stakeholder review of transmission planning, but does not consider local facilities unless they're directly related to the regional plan.

# Proposed Changes to the Current Planning Process

- The PTOs support an expansion of the PAC process to allow stakeholder input to transmission planning for local transmission facilities.
- Each PTO would be responsible for:
  - Developing a needs analysis for its local transmission facilities;
  - Presenting a plan for addressing those needs;
  - Addressing issues arising out of the PAC meetings;
  - Reporting status of proposed solutions.
- The PAC may periodically change meeting locations to focus attention on local transmission needs in the area where the meeting is held.

# Other Proposed Changes

- Quarterly project postings will contain status of transmission plans for local facilities.
- PTOs and ISO-NE will develop a uniform system for solicitation of Tx Customer load forecasts and other information and exchanging data consistent with CEII.
- PTOs and ISO-NE will coordinate to establish consistent methods for taking demand response and customer requests into account for planning purposes.
- PTOs and ISO-NE will coordinate to establish a dispute resolution procedure specifically targeted to the planning process.

# Conclusions

- The PTOs are actively engaged with the ISO and stakeholders in the Order 890 compliance process.
- Bringing local transmission planning activities into the PAC process is a key component to the PTOs' compliance proposal.
- The PTOs are committed to ensuring that transmission planning for local facilities complies with all nine of the Commission's planning criteria.