

# **Comments on SPP's Draft Compliance Filing on Order 890 Planning Requirements**

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# Principal Concerns with SPP's Draft Attachment O

## □ Form

- Attachment O relies heavily on non-specific cross-references to other documents.
  - ✓ Examples: §§ 2.4, 3.2.3, 3.2.4, and 3.4.1.
  - ✓ More specificity needed to satisfy requirement that previously approved plans be shown to satisfy Order 890. (P 439)
  - ✓ At a minimum, cross-references should cite specific provisions SPP relies upon as satisfying Order 890.

**Principal Concerns with  
SPP's Draft Attachment O  
(cont'd)**

**□ Process**

- § 3.1.1: Purpose of planning summit is “to share ... study findings with stakeholders.”
  - ✓ Suggests that “study findings” already finalized prior to planning summit.
  - ✓ Clarification needed to ensure consistency with PP 454 and 460 of Order 890.

## Principal Concerns with SPP's Draft Attachment O (cont'd)

### ❑ Process (cont'd)

- Still unclear where individual TO planning stops and SPP planning starts.
  - ✓ See § 2.4: not very informative.
  - ✓ Individual TO planning criteria used to determine need for “Zonal Reliability Upgrades.”

**Principal Concerns with  
SPP's Draft Attachment O  
(cont'd)**

**□ Substance**

- **Economic studies:**
  - ✓ Addressed in § 9.5.4.
  - ✓ No attempt to identify the reliability benefits of an economic upgrade (per § 8 of Staff White Paper).

**Principal Concerns with  
SPP's Draft Attachment O  
(cont'd)**

- ❑ **Substance (cont'd)**
  - **Inter-regional Coordination (§ 13)**
    - ✓ Based primarily on existing JOAs.
    - ✓ Coordination with other parties is *ad hoc*. No vehicle for ongoing coordination.