

137 FERC ¶ 61,040  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;  
Philip D. Moeller, John R. Norris,  
and Cheryl A. LaFleur.

Entergy Services, Inc.

Docket No. ER11-4327-000

ORDER ACCEPTING TARIFF AMENDMENTS

(Issued October 14, 2011)

1. On August 17, 2011, pursuant to section 205 of the Federal Power Act,<sup>1</sup> Entergy Services, Inc. (Entergy), acting as agent for the Entergy Operating Companies (Operating Companies),<sup>2</sup> submitted proposed revisions to Attachment T (Cost Recovery of New Facilities) of its Open Access Transmission Tariff (OATT) that expand the time horizon for identifying Base Plan Upgrades from three years to five years. In this order, we will accept Entergy's proposed amendments, effective October 17, 2011.

**I. Background**

2. On April 24, 2006, the Commission approved, with modifications, Entergy's proposal for Southwest Power Pool, Inc. (SPP) to act as the Independent Coordinator of Transmission (ICT) for the Entergy transmission system for an initial term of four years.<sup>3</sup>

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<sup>1</sup> 16 U.S.C. § 824d (2006).

<sup>2</sup> The Entergy Operating Companies are: Entergy Arkansas, Inc.; Entergy Gulf States Louisiana, LLC; Entergy Louisiana, LLC; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; and Entergy Texas, Inc.

<sup>3</sup> *Entergy Servs., Inc.*, 115 FERC ¶ 61,095 (2006) (ICT Approval Order), *order on reh'g*, 116 FERC ¶ 61,275, *order on compliance*, 117 FERC ¶ 61,055, *order on clarification*, 119 FERC ¶ 61,013 (2007).

The Commission later approved Entergy's request to extend the ICT arrangement for an additional two years.<sup>4</sup>

3. A significant part of the ICT arrangement is the transmission planning and pricing methodologies, which are found in Attachments K and T to Entergy's OATT, respectively. Under Attachment K, each year, Entergy develops a Construction Plan using the most current validated regional models that have been developed for the Base Case Model. The Construction Plan includes a list of projects that are funded and will be built in the next three years. Entergy submits the draft Construction Plan to the ICT, which solicits comments from stakeholders and performs an independent reliability assessment of the draft Construction Plan.<sup>5</sup>

4. As Entergy is developing its Construction Plan, the ICT independently develops a Base Plan to identify the transmission upgrades and construction projects that the ICT believes are necessary to comply with the planning criteria.<sup>6</sup> The Base Plan forms the basis for classifying facilities for the purpose of cost allocation under Attachment T. Attachment T includes, among other things, provisions on the classification of transmission investments, recovery of upgrade costs, and planning redispatch. Under this methodology, facilities are either classified as Base Plan Upgrades, the costs of which are rolled into base rates, or Supplemental Upgrades, the costs of which are directly assigned.

5. Base Plan Upgrade investments are investments necessary to: (1) maintain existing, long-term firm point-to-point service commitments and network transmission service (including investments necessary to serve load growth requirements); (2) maintain applicable levels of integration of generators qualified at the Network Resource Interconnection Service or Network Integration Transmission Service levels; (3) meet regional safety and reliability standards; and (4) maintain firm transmission service commitments where the ability to honor such commitments has been degraded due to events that are beyond the control of the Transmission Provider (such as increased loop flows from neighboring regions).<sup>7</sup> Base Plan Upgrade costs are recovered through

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<sup>4</sup> *Entergy Servs., Inc.*, 133 FERC ¶ 61,136 (2010) (ICT Extension Order).

<sup>5</sup> *Entergy Servs., Inc.*, 124 FERC ¶ 61,268, at P 8 (2008) (Attachment K Order).

<sup>6</sup> Planning criteria are the standards and procedures used in developing transmission plans and models for the Entergy system.

<sup>7</sup> ICT Approval Order, 115 FERC ¶ 61,095 at P 159.

Entergy's transmission rates, including point-to-point and network transmission service rates under the OATT, bundled retail rates and grandfathered agreements.<sup>8</sup>

6. All other upgrades are Supplemental Upgrades, which can be constructed to accommodate a request for an "economic upgrade" or a request for specific interconnection or delivery service. Supplemental Upgrades are typically designed to: (1) reduce congestion on the transmission system (e.g., reduce the delivered price of power for particular loads) by increasing the transfer capability across, out of or into Entergy's transmission system; and/or (2) serve load at a higher level of reliability.<sup>9</sup> The cost of Supplemental Upgrades is generally paid for by the party requesting service.<sup>10</sup> If the Supplemental Upgrade is later found to be needed to reliably serve other customers, including native load, the entity that originally funded it will be compensated, and to extent that Supplemental Upgrade is needed in the future to meet load growth, such costs will then be treated as costs for Base Plan Upgrades and rolled into rates.<sup>11</sup> For the purpose of determining whether a proposed upgrade should be considered a Base Plan Upgrade or a Supplemental Upgrade, section 3.2 of Attachment T provides that any upgrade that is not in the then-current Base Plan for which construction is to be initiated within the next three years is considered a Supplemental Upgrade.

7. On March 17, 2009, the Commission initiated a process to assess the continuing benefits of SPP's service as the ICT<sup>12</sup> and also sought input from Entergy's retail

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<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.* P 161 & n.103. The cost of Supplemental Upgrades to accommodate point-to-point transmission service requests are to be recovered under the Commission's "higher of" pricing policy. If the point-to-point transmission customer pays the rolled-in transmission rate, it will not be deemed to have individually funded the upgrade and will not be entitled to any financial compensation under Attachment T. In this case, the cost of Supplemental Upgrades for point-to-point transmission service will be recovered through Entergy's transmission rates, including point-to-point and network transmission service rates under the OATT, bundled retail rates and grandfathered agreements.

<sup>11</sup> Attachment T, section 4.3 states that a customer funding a Supplemental Upgrade will receive financial compensation when the upgraded capacity is used by others or when it is later resold on a long-term basis.

<sup>12</sup> *Entergy Servs., Inc.*, 126 FERC ¶ 61,227 (2009).

regulators. Subsequently, Entergy's retail regulators formed the Entergy Regional State Committee (E-RSC)<sup>13</sup> to provide collective input on the operation and construction of the transmission system and the operations and functions of the ICT. On December 16, 2010, the Commission accepted a new Attachment X to the OATT giving the E-RSC the authority, upon the unanimous vote of its members, to direct Entergy to make a section 205 filing to change the terms and conditions that apply to cost allocation for transmission projects and to add specific projects to the Construction Plan that Entergy develops.<sup>14</sup>

## II. Entergy's Proposal

8. Entergy proposes to amend section 3.2 of Attachment T to provide that Base Plan Upgrades are facilities included in the Base Plan for which construction will be initiated within the next five years, instead of the current three-year horizon. Entergy states that this is consistent with an E-RSC resolution that directs Entergy to extend the time horizon used to identify Base Plan Upgrades from three to five years, in order to more appropriately reflect the transmission infrastructure needed to address longer-term reliability concerns on Entergy's system. Entergy notes that while the E-RSC recognizes that changes to the Base Plan time horizon could affect the cost allocation of transmission investments, the E-RSC concluded that the potential impact is outweighed by the potential for increased transmission investment, reduced congestion costs and customer benefits.

9. According to Entergy, the ICT develops the Base Plan each year for the following calendar year and then posts the final Base Plan on the Open Access Same-Time Information System (OASIS) annually in December, i.e., the Base Plan for 2012 will be finalized in or around December 2011.<sup>15</sup> Therefore, Entergy maintains that under the

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<sup>13</sup> The members of the E-RSC are: the Arkansas Public Service Commission, the Louisiana Public Service Commission, the Mississippi Public Service Commission, the Public Utility Commission of Texas, and the City Council of New Orleans.

<sup>14</sup> *Entergy Servs., Inc.*, 133 FERC ¶ 61,211 (2010) (E-RSC Authority Order).

<sup>15</sup> Entergy notes that on August 23, 2011, consistent with Appendix 1 to Attachment K, the ICT led a transmission summit during which the ICT presented its ten-year reliability assessment and Entergy presented its current three-year Construction Plan along with its Horizon Plan that covers the ten-year planning horizon. Entergy states that this ensured that stakeholders are presented with information related to years four and five of the expected five-year time horizon for the ICT's 2012 Base Plan and Entergy's 2012 Construction Plan.

extension it has proposed, Base Plan Upgrades that include projects for which construction will be initiated within five years will be implemented when the ICT's 2012 Base Plan is implemented.<sup>16</sup> Entergy contends that the E-RSC concurs with this timing and requests an October 17, 2011 effective date.<sup>17</sup>

### **III. Notice of Filing and Responsive Pleadings**

10. Notice of Entergy's filing was published in the *Federal Register*, 76 Fed. Reg. 53120 (2011), with interventions and protests due on or before September 7, 2011. Union Power Partners, L.P. (Union Power) filed a timely motion to intervene and comments. Entergy filed an answer to Union Power's comments.

#### **A. Union Power's Comments**

11. Union Power states that while it generally agrees that the planning horizon for the Base Plan upgrades must be increased, Entergy's proposal does not go far enough. It therefore requests that the Commission require Entergy to increase the Base Plan horizon from three years to ten years.<sup>18</sup> Union Power claims that with a ten-year horizon, Entergy's planning process will be consistent with electric industry standards, and it contends that a ten-year horizon will serve as a basis upon which Entergy can implement the Commission's policy on rollover rights on a non-discriminatory basis. In addition, Union Power adds, the use of a ten-year planning horizon will ensure that Entergy rolls into the rates paid by all transmission customers the costs of upgrades required for load growth or to maintain reliability and mitigate "base case overloads" on the system.

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<sup>16</sup> Entergy states that until the Base Plan is finalized and effective, the 2011 Base Plan, which covers a three-year time horizon, will continue to apply. It specifies that there are no facilities in the 2011 Base Plan for which construction will be initiated outside of that plan's three-year horizon.

<sup>17</sup> We note that Entergy's Transmittal at pages 3 and 5, respectively, requests effective dates of October 16, 2011 and October 17, 2011. Because Entergy makes no showing to support a waiver of the 60-day notice requirement, we will construe its filing as a request for an October 17, 2011 effective date.

<sup>18</sup> Union Power recognizes that a transition period may be appropriate to achieve the goal of a ten-year planning horizon for identifying Base Plan Upgrades. It suggests the establishment of a yearly review process to monitor the impact of changing the ICT Base Plan horizon. Union Power Comments at 7 n.20.

12. While Union Power concedes that the Base Plan is used for cost allocation purposes and that Entergy is not obligated to build the upgrades included in the Base Plan, it states that the underlying purpose of the Base Plan is to identify the upgrades to the system whose costs are properly rolled in on a system-wide basis for cost recovery purposes and the upgrades to be treated as Supplemental Upgrades. Union Power states that the current version of Attachment T limits the future time period considered for Base Plan upgrades to the same time frame Entergy uses for the Construction Plan (i.e., three years). It notes that Entergy has represented that, for planning purposes, Entergy studies the transmission system over a ten-year horizon. Union Power argues that Entergy's proposed five-year horizon for Base Plan Upgrades would not address reliability upgrades needed for the remaining five years, i.e., years six through ten of the ten-year planning horizon that Entergy purportedly uses for planning its system. Although the ICT performs a Base Plan and Entergy prepares the three-year Construction Plan, Union Power states that it is unclear whether Entergy plans its system over a ten-year planning horizon because Entergy does not disclose these studies to market participants.

13. To the extent that Entergy does perform studies for the longer horizon, Union Power contends that the planning criteria used for Entergy's transmission assessment for years four through ten is unknown, and that Entergy does not permit regulators or stakeholders to participate in that process. Entergy has provided no justification of the need for such non-transparency and, Union Power alleges, by failing to disclose its transmission planning process for years four through ten, Entergy fails to comply with the reforms to the transmission planning process that the Commission mandated in Order No. 890<sup>19</sup> and Order No. 693<sup>20</sup> regarding transparency and industry-wide consistency.<sup>21</sup>

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<sup>19</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

<sup>20</sup> *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

<sup>21</sup> Union Power also states that in Order Nos. 890 and 693, the Commission adopted a number of reforms to require transparency and industry-wide consistency in the calculation of Available Transfer Capability (ATC), ATC components (i.e., Total Transfer Capability, Existing Transmission Commitments, Capacity Benefit Margin, and Transmission Reserve Margin), and ATC-related definitions, data, and modeling

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In the event the Commission accepts Entergy's proposal, Union Power suggests that the Commission require Entergy to make these longer-term studies (i.e., for years six through ten) available to stakeholders and direct Entergy to provide stakeholders access to the data and models necessary to replicate the results of these studies, as required by Order No. 890 and the Commission's orders accepting Entergy's Order No. 890 compliance filings.<sup>22</sup>

14. Union Power states that under Order No. 890, rollover rights are only available to customers who obtain long-term transmission service for a minimum term of five years.<sup>23</sup> It explains that under Entergy's OATT, a long-term Transmission Service Request (TSR) that would be eligible for rollover rights by definition extends well past Entergy's proposed planning horizon for the Base Plan Upgrades. Further, Union Power states that pursuant to section 2.3.2 of Attachment D (System Impact Study Criteria)<sup>24</sup> to Entergy's OATT, service is evaluated for periods beyond the initial term of service. Thus, to evaluate a TSR that would qualify for rollover rights, Union Power asserts that the ICT must perform a transmission analysis for a period greater than the current three-year Base Plan Upgrade planning horizon to determine whether upgrades are needed to grant the requested transmission service and rollover rights.

15. According to Union Power, Entergy's current and proposed approaches both are at odds with standard practice in the electric utility industry, which is for the transmission owner or transmission provider to include reliability upgrades for the full ten-year planning horizon in models used to evaluate long-term TSRs and rollover rights. It further asserts that the industry has long accepted that transmission owners are responsible for reliability upgrades and transmission customers should not be directly assigned financial responsibility for them. In this regard, Union Power submits that both SPP and Midwest Independent Transmission System Operator, Inc. include all reliability upgrades over a planning horizon of at least ten years in the models they use for the

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assumptions in order "to reduce the potential for undue discrimination in the provision of transmission service, specifically by reducing the opportunity for transmission providers to exercise excessive discretion."

<sup>22</sup> Union Power Comments at 9 (citing *Entergy Servs., Inc.*, 124 FERC ¶ 61,268 (2008), *order on compliance*, 127 FERC ¶ 61,272 (2009)).

<sup>23</sup> *Id.* at 10 (citing Order No. 890, FERC Stats. & Regs. ¶ 31,241 at P 1231).

<sup>24</sup> The purpose of Attachment D is to describe Entergy's business practices for conducting System Impact Studies and Facilities Studies when evaluating requests for transmission service.

evaluation of long-term TSRs and they do not directly assign cost responsibility for reliability upgrades to transmission customers. Therefore, Union Power suggests that Entergy's use of a ten-year planning horizon for planning and cost allocation should not be delayed until Entergy joins a regional transmission organization (RTO) as such delay will permit Entergy to continue its current practices.

16. Union Power further claims that requiring Entergy to extend the Base Plan Upgrade time period beyond the five-year horizon will also address the issue of base case overloads<sup>25</sup> on the Entergy system and the unduly discriminatory treatment that results from how Entergy currently addresses such overloads. Specifically, Union Power maintains that Entergy requires transmission customers to fund the often extraordinary upgrade costs to remedy pre-existing base case overloads in order to secure incremental transmission service. Moreover, it contends that the scope of the upgrades, in terms of both costs and long lead times necessary for merchant generators to secure transmission service from Entergy, can make these generators appear too risky to buyers and/or prohibitively expensive to load-serving entities seeking to secure least-cost resources. As a result, Union Power submits that non-utility, existing, uncommitted, efficient generation becomes "trapped" on Entergy's system. It concludes that Entergy's proposal to increase the time horizon to five years would provide only limited relief from this problem.

17. Union Power states that Entergy has consistently resisted calls to use a planning horizon to identify Base Plan Upgrades for cost allocation purposes that is consistent with the period it uses for evaluating TSRs. It points to Entergy's comments in the E-RSC proceeding, where Entergy stated that the use of a longer planning horizon would inappropriately shift the costs of upgrades from individual transmission customers to native load. Union Power refutes this conclusion and explains that the costs of upgrades necessary for reliability and to accommodate load growth are appropriately shared by all transmission customers, including interconnected generators, network customers, and native load, all of whom benefit from a reliable transmission system. Union Power adds that the use of a ten-year planning horizon for planning and cost allocation would ensure that costs for Base Plan Upgrades are allocated to all those who benefit from such upgrades.

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<sup>25</sup> Base case overloads occur when the existing transmission commitment impact on certain flowgates is greater than the flowgates' capacity, and thus, these flowgates are overloaded in the available transfer capability power flow models, and access to the transmission system is reduced.

18. Union Power concedes that this issue does not affect all users of the Entergy system to the same degree. Particularly, it states that Entergy uses undocumented Operating Guides for redispatch and system reconfiguration as a mitigation measure to avoid thermal violations. Union Power explains that the use of non-public, proprietary Operating Guides for transmission planning not only fails to satisfy the Commission's transparency requirements, but is unduly discriminatory on its face, as these guides are not available to assess the ability for other transmission customers to access the Entergy system (e.g., the way Entergy actually dispatches its generation is not included in the models used to evaluate transmission service). As a result, to the extent that additional transmission capacity is created by Entergy's actual dispatch that could be used to grant transmission service or prevent cost allocation to other transmission customers, such capacity is omitted from the models, according to Union Power. Because Entergy uses undocumented Operating Guides for re-dispatch and system reconfiguration for its sole benefit, Union Power contends that Entergy is in a position to manipulate the need for system upgrades that can result in TSRs being refused or the would-be transmission customer saddled with the financial responsibility for upgrading constrained facilities. Expanding the time period for Base Plan Upgrades to the full ten-year planning horizon would limit Entergy's potential ability to manipulate planning, and Union Power claims that it will provide relief from some of Entergy's alleged unduly discriminatory treatment of transmission customers.

19. In addition to its arguments regarding the Base Plan horizon, Union Power also questions Entergy's participant funding cost allocation methodology. Union Power argues that participant funding has proven itself to be ineffective as a mechanism for promoting the construction of new transmission on the Entergy system. Union Power articulates its concern that approval of Entergy's proposal may be counterproductive and fosters a misperception that the cost allocation problem has been addressed. If the Commission accepts the Entergy proposal, Union Power urges the Commission to clarify that adjusting the Base Plan Upgrade horizon is only the first incremental action toward reforming the Attachment T cost allocation provisions, and that Entergy must make additional reforms to its cost allocation rules in Attachment T, in particular, those addressing participant funding.

**B. Entergy's Answer**

20. In reply, Entergy states that Union Power's proposed recommendation is unsupported and inconsistent with the resolution of the E-RSC. Entergy further states that Attachment T to Entergy's OATT exclusively addresses cost allocation for transmission upgrades under Entergy's OATT for Base Plan Upgrades. Entergy contends that Union Power's arguments erroneously conflate cost allocation principles and long-term planning principles when the two are distinct.

21. Entergy reiterates that the E-RSC recognized that changes to the Base Plan time horizon could affect the cost allocation of transmission investments. However, Entergy adds that the E-RSC fully debated the extension of the planning horizon used to identify Base Plan Upgrades, including a period longer than five years, but ultimately determined that an extension from three to five years was appropriate.

22. Entergy states that although Union Power raises its claim in a number of different ways, the gist of Union Power's argument is that a five-year time horizon for identifying Base Plan Upgrades is inconsistent with the long-term planning horizon of ten years. Entergy explains that Union Power fails to acknowledge that the extension to five years is for cost allocation purposes only. The fact that the transmission system is planned using a ten-year horizon does not mean that the Base Plan also must be extended to ten years. Entergy contends that the fact that a transmission facility may have been identified as a potential reliability project in the outer years of a transmission plan does not provide a basis for treating that facility as a Base Plan Upgrade and rolling the costs of the facility into base transmission rates.

#### **IV. Discussion**

##### **A. Procedural Matters**

23. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2011), Union Power's timely, unopposed motion to intervene serves to make it a party to this proceeding. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2011), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We will accept Entergy's answer because it has provided information that assisted us in our decision-making process.

##### **B. Substantive Matters**

24. We accept for filing Entergy's proposed tariff amendments as just and reasonable, without modification, to become effective October 17, 2011. Extending the horizon of the Base Plan, as noted by Entergy in its initial filing, has the potential for increased transmission investment that would yield reduced congestion costs and customer benefits. Even though Union Power views the extension positively, it raises several arguments in its protest that generally fall into two categories: (1) cost allocation (specifically, issues regarding the length of study horizon, treatment of base case overloads, and participant funding); and (2) transmission planning (specifically, transparency). As discussed in more detail below, we are not persuaded by Union Power's arguments regarding cost allocation, but we do agree with Union Power's concerns regarding transparency in the transmission planning process.

25. As an initial matter, Union Power expresses concern that Entergy's cost allocation methodology does not ensure that Entergy rolls into the rates paid by all transmission customers the costs of upgrades required for load growth or to maintain reliability. In response, we note that customers that initially fund Supplemental Upgrades are later compensated if the upgrade is ultimately needed for the purposes of reliability and deemed a Base Plan Upgrade by the ICT.<sup>26</sup> Thus, the costs of upgrades ultimately determined to be required for load growth or to maintain reliability on the system are rolled into rates paid by all transmission customers.

26. More generally, Union Power's arguments reflect concerns by stakeholders in the Entergy region that customers have been unwilling to commit to reservations that identify significant network upgrade costs and, as a result, transmission upgrades that could benefit the system may have not been pursued.<sup>27</sup> The E-RSC and stakeholders have worked to develop the proposal before us, which has the potential to address these concerns, and which Union Power agrees is a step in the right direction. Accordingly, we accept the proposal as just and reasonable. Union Power has not persuaded us that any further changes to Entergy's cost allocation may be necessary at this time.<sup>28</sup>

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<sup>26</sup> See Entergy's OATT, Attachment T, section 4.3.2.2 (as part of the ICT's development of the Base Plan, the ICT will determine whether any Supplemental Upgrades that were previously funded by a customer are necessary to serve forecasted load growth reliably in the next calendar year). See also *id.* section 4.3.4 (If it is determined by the ICT that a previously funded Supplemental Upgrade is necessary to serve forecasted load growth reliably in the next calendar year, then the financial compensation payment described in section 4.3.5.4 will be paid to the party(ies) previously funding the Supplemental Upgrade).

<sup>27</sup> See, e.g., Comments filed in response to the ICT's annual performance reports in Docket No. ER05-1065-000.

<sup>28</sup> We understand that the dialogue regarding the merits of participant funding on the Entergy system is ongoing. While the broader arguments raised by Union Power regarding Entergy's participant funding methodology are beyond the scope of this proceeding, we continue to encourage stakeholders to participate in the ongoing process to resolve transmission-related issues on the Entergy system. We also note that Entergy's methodology for evaluating transmission service requests is pending before the Commission in Docket Nos. ER05-1065-011 and OA07-32-008. In that proceeding, parties, including Union Power, have raised concerns that Entergy's study methodology will result in customers being responsible for costs attributable to relieving base case overloads. While such issues are beyond the scope of this proceeding, they will be

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27. Union Power's broader arguments on transmission planning and transparency also fall beyond the scope of this proceeding, in which we consider only the time horizon used to identify Base Plan upgrades. Nevertheless, we note that consistent with the transparency principle in Order No. 890,<sup>29</sup> Entergy's tariff already requires it to disclose to stakeholders the basic methodology, criteria, processes, data, and assumptions in all studies and planning processes performed as part of Entergy's planning process. Such information must be provided in sufficient detail to enable interested parties to replicate the applicable study and shall include, but not be limited to, modeling response files, documents detailing Entergy's proposed and approved transmission reliability projects, maps, and special notices.<sup>30</sup> Furthermore, in response to similar concerns Union Electric raised in the proceeding addressing Entergy's compliance with Order No. 890, the Commission noted that Entergy's Attachment K already provides that Entergy will perform studies based on information for a ten-year time horizon.<sup>31</sup> Entergy should therefore make information regarding its ten-year studies available to all stakeholders (subject to relevant confidentiality and Confidential Energy Infrastructure Information provisions).<sup>32</sup> We recognize the need for transparency, and we expect that Entergy's disclosure of its ten-year study will help stakeholders better understand Entergy's long-term reliability needs.

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addressed, as appropriate, in the proceeding for Docket Nos. ER05-1065-011 and OA07-32-008.

<sup>29</sup> Order No. 890, FERC Stats. & Regs. ¶ 31,241.

<sup>30</sup> *See, e.g.*, Entergy OATT, Attachment K, section 10.6.

<sup>31</sup> *See Entergy Servs., Inc.*, 127 FERC ¶ 61,272 at P 92.

<sup>32</sup> To the extent that Union Power or others have evidence that Entergy is not following its tariff provisions regarding the disclosure of transmission planning methodologies and data, they may file a complaint pursuant to section 206 of the FPA.

The Commission orders:

We hereby accept Entergy's revisions to Attachment T of the OATT, as discussed in the body of this order, effective October 17, 2011.

By the Commission. Commissioner Spitzer is not participating.

( S E A L )

Nathaniel J. Davis, Sr.,  
Deputy Secretary.