

149 FERC ¶ 61,247
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
and Norman C. Bay.

Public Service Company of New Mexico	Docket Nos. ER13-1447-000
NorthWestern Corporation	ER13-1448-000
Arizona Public Service Company	ER13-1450-000
Deseret Generation & Transmission Co-operative, Inc.	ER13-1457-000
Tucson Electric Power Company	ER13-1461-000
UNS Electric, Inc.	ER13-1462-000
Portland General Electric Company	ER13-1463-000
El Paso Electric Company	ER13-1465-000
NV Energy, Inc.	ER13-1466-000
Idaho Power Company	ER13-1467-000
Public Service Company of Colorado	ER13-1469-000
California Independent System Operator Corporation	ER13-1470-000
Cheyenne Light, Fuel and Power Company	ER13-1471-000
Black Hills Power, Inc.	ER13-1472-000
PacifiCorp	ER13-1473-000
Black Hills/Colorado Electric Utility Company, LP	ER13-1474-000
Puget Sound Energy, Inc.	ER13-1729-000
Avista Corporation	ER13-1730-000
MATL LLP	ER14-346-001
Bonneville Power Administration	NJ13-10-000

ORDER ON COMPLIANCE FILINGS

(Issued December 18, 2014)

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Appendix A: Abbreviated Names of Intervenors

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1. On May 10, 2013, the California Independent System Operator (CAISO); Avista Corporation (Avista), MATL LLP (MATL), and Puget Sound Energy, Inc. (Puget Sound);¹ Deseret Generation & Transmission Co-operative, Inc. (Deseret), Idaho Power Company (Idaho Power), NorthWestern Corporation (NorthWestern), PacifiCorp, and Portland General Electric Company (Portland General) (collectively, NTTG² Applicants); Arizona Public Service Company (APS), Black Hills Power, Inc. (Black Hills Power), Black Hills Colorado Electric Utility Company, LP (Black Hills/Colorado Electric), Cheyenne Light, Fuel & Power Company (Cheyenne LF&P), El Paso Electric Company (El Paso), NV Energy, , Public Service Company of Colorado (PSCo), Public Service Company of New Mexico (PNM), Tucson Electric Power Company (Tucson Electric), and UNS Electric, Inc. (UNS Electric) (collectively, WestConnect Applicants), on behalf of CAISO, ColumbiaGrid, NTTG, and WestConnect transmission planning regions submitted, pursuant to section 206 of the Federal Power Act (FPA),³ revisions to their respective Open Access Transmission Tariffs (OATTs or tariffs) to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000.⁴ In this order, we conditionally accept the interregional compliance filings subject to further compliance filings as discussed below.⁵

¹ Avista and Puget Sound submitted their Order No. 1000 interregional compliance filings on June 19, 2013. MATL's compliance filing was submitted on November 7, 2013, and subsequently amended, via errata, on November 14, 2013.

² NTTG stands for Northern Tier Transmission Group.

³ 16 U.S.C. § 824e (2012).

⁴ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323, at PP 345-483, 566-750 (2011), *order on reh'g and clarification*, Order No. 1000-A, 139 FERC ¶ 61,132, at PP 493-522, 626-747; *order on reh'g*, Order No. 1000-B, 141 FERC ¶ 61,044, at PP 61-64 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

⁵ We note that PacifiCorp incorrectly submitted its Attachment K in eTariff so that it superseded the title page section of its OATT rather than the existing Attachment K. In the further compliance filing, PacifiCorp should submit a tariff record to restore the title page section to its OATT and submit its revised Attachment K so that it supersedes the existing Attachment K section of its OATT. Appendix D below lists the eTariff records at issue in this order.

2. On June 9, 2013, Bonneville Power Administration (Bonneville Power) submitted a Petition for Declaratory Order (Petition) seeking a determination from the Commission that revisions to Attachment K of its OATT substantially conform or are superior to the *pro forma* OATT as it has been modified by Order No. 1000.⁶ In this order, we refer to Avista, MATL, Puget Sound, and Bonneville Power collectively as ColumbiaGrid Applicants. We refer to CAISO, ColumbiaGrid Applicants, NTTG Applicants, and WestConnect Applicants collectively as Western Filing Parties. Bonneville Power also seeks exemption of the Commission's filing fee in its Petition. In this order, we grant, in part, Bonneville Power's Petition, subject to further modifications.

I. Background

3. In Order No. 1000, the Commission adopted a package of reforms addressing transmission planning and cost allocation that, taken together, are designed to ensure that Commission-jurisdictional services are provided at just and reasonable rates and on a basis that is just and reasonable and not unduly discriminatory or preferential. In particular, the Commission determined that the transmission planning requirements of Order No. 890⁷ were too narrowly focused geographically and failed to provide for adequate analysis of the benefits associated with interregional transmission facilities in

⁶ We recognize that Bonneville Power is not a public utility under section 201 of the FPA, 16 U.S.C. § 824 (2012), and is not subject to Commission directives made pursuant to FPA section 206. At the time of submitting its Petition on June 9, 2013, Bonneville Power had on file with the Commission a safe harbor transmission tariff that was found to substantially conform with or be superior to the Commission's *pro forma* tariff. However, on November 21, 2013, the Commission found that several provisions of Bonneville Power's tariff needed to be modified to substantially conform with or be superior to the *pro forma* tariff; thus, the Commission was unable to grant Bonneville Power's request for safe harbor reciprocity status at the time. *Bonneville Power Admin.*, 145 FERC ¶ 61,150 (2013). Notwithstanding, in this order, we address revisions to Bonneville Power's Attachment K in the context of the Western Filing Parties' common proposal and also indicate further revisions needed in order for Bonneville Power's Attachment K to substantially conform to the *pro forma* OATT, as modified by Order No. 1000.

⁷ *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, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

neighboring transmission planning regions.⁸ The Commission concluded that interregional transmission coordination reforms were necessary.⁹ Thus, the Commission required each public utility transmission provider to establish further procedures with each of its neighboring transmission planning regions for the purpose of: (1) coordinating and sharing the results of the respective regional transmission plans to identify possible interregional transmission facilities that could address regional transmission needs more efficiently or cost-effectively than separate regional transmission facilities,¹⁰ and (2) jointly evaluating those interregional transmission facilities that the pair of neighboring transmission planning regions identify, including those proposed by transmission developers and stakeholders.¹¹ The Commission defined

⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 369.

⁹ *Id.* P 370.

¹⁰ While the Commission required public utility transmission providers to establish further procedures with each of its neighboring transmission planning regions to coordinate and share the results of their respective regional transmission plans to identify possible interregional transmission facilities that could address regional transmission needs more efficiently or cost-effectively than separate regional transmission facilities, the Commission neither required nor precluded public utility transmission providers from conducting interregional transmission planning. *See, e.g.*, Order No. 1000, FERC Stat. & Regs. ¶ 31,323 at P 399 (clarifying that “the interregional transmission coordination requirements that [the Commission] adopt[s] do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan” and, “[t]o the extent that public utility transmission providers wish to participate in processes that lead to the development of interregional transmission plans, they may do so and, as relevant, rely on such processes to comply with the requirements of this Final Rule.”). The Commission also required that “the developer of an interregional transmission project to first propose its transmission project in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located.” *Id.* P 436.

¹¹ Order No 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). The Commission clarified that “the requirement to coordinate with neighboring regions applies to public utility transmission providers within a region as a group, not to each individual public utility transmission provider acting on its own. For example, within an RTO or ISO, the RTO or ISO would develop an interregional cost allocation method or methods with its neighboring regions on behalf of its public utility transmission owning members.” Order No. 1000-A,

(continued ...)

an interregional transmission facility as “one that is located in two or more transmission planning regions.”¹² Furthermore, the Commission required each public utility transmission provider to describe the methods by which it will identify and evaluate interregional transmission facilities and to include a description of the type of transmission studies that will be conducted to evaluate conditions on neighboring systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities.¹³ Consistent with the requirement that public utility transmission providers must describe the methods by which they will identify and evaluate interregional transmission facilities, the Commission explained that “each public utility transmission provider must explain in its OATT how stakeholders and transmission developers can propose interregional transmission facilities for the public utility transmission providers in neighboring transmission planning regions to evaluate jointly.”¹⁴

4. In addition, in Order No. 1000, the Commission required that each public utility transmission provider in a transmission planning region have, together with the public utility transmission providers in its own transmission planning region and a neighboring transmission planning region, a common method or methods for allocating the costs of a new interregional transmission facility among the beneficiaries of that transmission facility in the two neighboring transmission planning regions in which the transmission facility is located.¹⁵ The Commission also required that each public utility transmission provider’s interregional cost allocation method or methods satisfy six interregional cost allocation principles.¹⁶ To be eligible for interregional cost allocation, an interregional

139 FERC ¶ 61,132 at P 630 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 584).

¹² *Id.* P 494 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 482 n.374).

¹³ *Id.* P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398).

¹⁴ *Id.* P 522.

¹⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 578, 582; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

¹⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603.

transmission facility must be selected in the relevant transmission planning regions' regional transmission plans for purposes of cost allocation.¹⁷

II. Compliance Filings

5. Western Filing Parties have developed common tariff language¹⁸ addressing the interregional transmission coordination and cost allocation requirements of Order No. 1000.¹⁹ Western Filing Parties state that the proposed interregional transmission coordination and cost allocation planning process are intertwined with the modifications to their regional and, to some extent, local, transmission planning processes currently pending before the Commission.²⁰ Western Filing Parties, with the exception of CAISO, APS, and PSCo, have each incorporated the provisions of the common tariff language into Attachment K of their respective tariffs. CAISO has incorporated the provisions of the common tariff language into tariff section 24 (Comprehensive Transmission Planning Process) and Appendix A (Definitions), APS has incorporated the common language into tariff Attachment E (Transmission Planning Process), and PSCo has incorporated the common language into tariff Attachment R – PSCo (Transmission Planning Process of Public Service Company of Colorado). ColumbiaGrid Applicants have also incorporated the common tariff language into, and filed, for informational purposes, the Fourth Amended and Restated ColumbiaGrid Planning and Expansion Functional Agreement (Fourth Restated PEFA).²¹ Western Filing Parties add that each public utility transmission provider is individually submitting the revised provisions to incorporate the common tariff language into its respective tariff, through eTariff, to comply with the Commission's filing requirements.²²

6. In addition to the common tariff language, the Western Filing Parties propose several revisions to existing tariff language to align the regional transmission planning processes with the proposed interregional transmission planning processes and to provide

¹⁷ *Id.* P 400.

¹⁸ *E.g.*, CAISO Compliance Filing, Docket No. ER13-1470-000, Attachment 1 (May 10, 2013) (Common Tariff).

¹⁹ *E.g.*, PacifiCorp Transmittal Letter at 2-3.

²⁰ *E.g.*, *id.* at 3.

²¹ *E.g.*, *id.* at 2.

²² *E.g.*, *id.* at 3.

clarification. Some of the proposed revisions are ministerial in nature. For example, CAISO proposes minor modifications to reflect changes in nomenclature from sub-regional and regional to regional and interregional.²³ Other proposed tariff revisions are more substantive and are discussed in detail below.

7. ColumbiaGrid Applicants state that because their Order No. 1000 interregional planning processes in Attachment K substantially rely on implementation of those processes through their participation in ColumbiaGrid, as reflected in the proposed Fourth Restated PEFA, their interregional compliance filings cannot become effective until such time as the Fourth Restated PEFA is effective.²⁴

III. Notice of Filing and Responsive Pleadings

8. Notice of the WestConnect Applicants', NTTG Applicants', and CAISO's interregional compliance filings was published in the Federal Register, 78 Fed. Reg. 29,362 (2013), with interventions and protests due on or before June 24, 2013. Notice of Avista's and Puget Sound's interregional compliance filings was published in the Federal Register, 78 Fed. Reg. 38,705 (2013), with interventions and protests due on or before August 5, 2013. Notice of Bonneville Power's petition for declaratory order was published in the Federal Register, 78 Fed. Reg. 39,279 (2013), with interventions and protests due on or before August 5, 2013. Notice of MATL's interregional compliance filing was published in the Federal Register, 78 Fed. Reg. 70,547 (2013), with interventions and protests due on or before December 5, 2013. Notices of intervention, timely-filed motions to intervene, and motions to intervene out-of-time were filed by the entities noted in Appendix A to this order. Protests and comments, including those submitted out-of-time, were filed by the entities noted in Appendix B to this order and are addressed below. Answers were filed by the entities noted in Appendix C to this order.

9. On July 3, 2013, Public Interest Organizations filed a motion to amend its motion to intervene to include as joint intervenors Center for Energy Efficiency and Renewable Technologies, the Clean Coalition, Interstate Renewable Energy Council, Interwest Energy Alliance, Renewable Northwest Project, Sierra Club, Sonoran Institute, Western Grid Group, Western Resource Advocates, and The Wilderness Society, and to submit comments. Public Interest Organizations argue that these organizations participated in the stakeholder proceedings in the respective regional proceedings of Western Filing

²³ California Independent System Operator Corporation, CAISO eTariff (OATT), §§ 24.8.4 (Information from BAAs and Regulators) (2.0.0) and 24.12 (WECC and Interregional Coordination) (3.0.0).

²⁴ Avista Transmittal at 4.

Parties; they have a direct and substantial interest in the results of the Order No. 1000 compliance process in the WestConnect region; their interests cannot be appropriately represented by any other entity; and their participation is in the public interest and will not prejudice other parties' interests in this proceeding. In their response to Public Interests Organizations' motion to amend, Western Filing Parties state that they do not oppose the addition of joint intervenors out of time.

IV. Discussion

A. Procedural Matters

10. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the notices of intervention and timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

11. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), we grant the unopposed motion by Public Interest Organizations seeking to amend the motion to intervene to include out of time additional joint intervenors and to submit comments given their interest, the early stage of this proceeding, and the absence of undue prejudice or delay.

12. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2014), prohibits an answer to a protest or an answer unless otherwise ordered by the decisional authority. We accept the answers filed in this proceeding because they have provided information that assisted us in our decision-making process.

B. Substantive Matters

13. We find that Western Filing Parties' interregional compliance filings partially comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000. Accordingly, we conditionally accept Western Filing Parties' interregional compliance filings, subject to further compliance filings, as discussed below.

14. Likewise, the Commission finds certain modifications to Bonneville Power's Attachment K substantially conform or are superior to the *pro forma* OATT, as modified by Order No. 1000.²⁵ Therefore, we grant in part Bonneville Power's petition, subject to

²⁵ We also note that in the context of our findings below with respect to Avista, Puget Sound, and MATL, we find that the parallel provisions contained in Bonneville Power's Attachment K do not substantially conform to the *pro forma* OATT, as modified by Order No. 1000.

further modifications. With regard to those aspects of its transmission planning process that do not substantially conform, the Commission provides direction to Bonneville Power for further modifications to its transmission planning process that Bonneville Power may implement if it chooses to have its Attachment K substantially conform or be superior to the *pro forma* tariff. We grant Bonneville Power's request for waiver of the filing fees because it is a non-public utility and federal agency and, therefore, is exempt from the Commission's filing fees.

1. Interregional Transmission Coordination Requirements

a. General Requirements

15. The Commission required each public utility transmission provider through its regional transmission planning process to coordinate with the public utility transmission providers in each of its neighboring transmission planning regions within its interconnection to implement the interregional transmission coordination requirements adopted in Order No. 1000.²⁶ The Commission also required public utility transmission providers in each pair of neighboring transmission planning regions to develop the same language to be included in each public utility transmission provider's tariff that describes the interregional transmission coordination procedures for that particular pair of regions.²⁷ Alternatively, if the public utility transmission providers so choose, the Commission allowed these procedures to be reflected in an interregional transmission coordination agreement among the public utility transmission providers within neighboring transmission planning regions that is filed with the Commission.²⁸

i. Compliance Filings

16. Western Filing Parties propose an interregional coordination and cost allocation process among the four transmission planning regions that encompass the United States portion of the Western Interconnection.²⁹ Western Filing Parties propose common tariff language to address the interregional coordination and cost allocation requirements of Order No. 1000. Western Filing Parties propose to define an interregional transmission

²⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 415.

²⁷ *Id.* P 475; *see also id.* P 346; Order No. 1000-A, 139 FERC ¶ 61,132 at P 223.

²⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 346, 475; Order No. 1000-A, 139 FERC ¶ 61,132 at P 223.

²⁹ *E.g.*, PacifiCorp Transmittal Letter at 2.

project as a proposed new transmission project that would directly interconnect electrically to existing or planned transmission facilities in two or more planning regions that is submitted into the regional transmission planning process of all such planning regions.³⁰ Bonneville Power has also adopted the common tariff language in its OATT and states that it participated both individually and as a ColumbiaGrid Applicant in the development of the common tariff language with Western Filing Parties.³¹

17. Western Filing Parties, with the exception of ColumbiaGrid Applicants, seek an effective date for their compliance filings of October 1, 2013 or, alternatively if that date is not workable, October 1, 2015. Western Filing Parties explain that the October 1, 2013 effective date would be workable, without disrupting their respective transmission planning cycles, if (1) the Commission issues order(s) accepting the substantive elements of these interregional compliance filings by October 1, 2013, and (2) the Commission issues orders accepting the substantive elements of each of their Order No. 1000 regional compliance filings in advance of the date the Commission issues order(s) with respect to these interregional compliance filings.

18. In addition to filing the common tariff language in their respective Attachment Ks, ColumbiaGrid Applicants have filed the common tariff language in the Fourth Restated PEFA for informational purposes only. In their Attachment Ks, ColumbiaGrid Applicants include numerous references to the Fourth Restated PEFA throughout the common tariff language. ColumbiaGrid Applicants state that because their Order No. 1000 interregional planning processes in their respective Attachment Ks substantially rely on implementation of those processes through their participation in ColumbiaGrid, as reflected in the proposed Fourth Restated PEFA, their respective Attachment Ks cannot become effective until such time as the Fourth Restated PEFA is effective.³²

19. ColumbiaGrid Applicants state that their proposed Order No. 1000 interregional transmission planning processes rely on, and are intertwined with, their Order No. 1000 regional compliance filings and related Third Restated PEFA filings.³³ ColumbiaGrid

³⁰ Common Tariff § 1(Definitions). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.1 (Definitions).

³¹ Bonneville Power Transmittal Letter at 1-2.

³² *E.g.*, Avista Transmittal Letter at 4.

³³ ColumbiaGrid Applicants submitted the Third Restated PEFA as part of their first Order No. 1000 regional compliance filings.

Applicants state that several non-jurisdictional entities that have executed the Third Restated PEFA have indicated reluctance to enter into further amendments to the PEFA, including the proposed Fourth Restated PEFA, absent further action by the Commission on ColumbiaGrid Applicants' regional Order No. 1000 compliance filings. Accordingly, ColumbiaGrid Applicants state, they have not yet sought authorization to execute the Fourth Restated PEFA.³⁴ ColumbiaGrid Applicants state that if executed, they anticipate filing the Fourth Restated PEFA Rate Schedule FERC No. CG1 for Commission acceptance.³⁵

20. ColumbiaGrid Applicants state that at such time as the Fourth Restated PEFA becomes effective, ColumbiaGrid Applicants anticipate that they will submit a new version of their respective Attachment Ks incorporating those changes proposed in this interregional filing and removing all provisions that are superseded by such proposed changes.³⁶ ColumbiaGrid Applicants state that, until such time as the proposed Fourth Restated PEFA and Attachment Ks implementing the proposed Fourth Restated PEFA become effective as filed, it is appropriate that the pre-Order No. 1000 PEFA – or if it becomes effective in accordance with its terms, the Third Restated PEFA – remain in effect.³⁷

21. In response to ColumbiaGrid Applicants' first Order No. 1000 regional compliance filing, the Commission conditionally accepted the Third Restated PEFA, subject to further revisions.³⁸ However, in Avista's, Puget Sound's, and MATL's second Order No. 1000 regional compliance filings, they stated that the proposed Third Restated PEFA and Fourth Restated PEFA were not, and may never be, effective, unless the Commission granted rehearing of the first compliance order.³⁹ Accordingly, Avista, Puget Sound, and MATL proposed to conduct regional transmission planning pursuant to Order No. 1000 under a new ColumbiaGrid Order No. 1000 Functional Agreement and to continue to conduct regional transmission planning on behalf of the PEFA planning

³⁴ *E.g.*, Avista Transmittal Letter at 4.

³⁵ *E.g.*, *id.* at 2.

³⁶ *E.g.*, *id.* at 4.

³⁷ *E.g.*, *id.* at 14.

³⁸ *Avista Corp.*, 143 FERC ¶ 61,255, at P 3 (2013).

³⁹ *Avista Corp.*, 148 FERC ¶ 61,212, at P 12 (2014).

parties under the pre-Order No. 1000 PEFA.⁴⁰ In the order addressing ColumbiaGrid's second regional compliance filing, the Commission found that the Order No. 1000 Functional Agreement should have been included as part of Avista's, Puget Sound's, and MATL's second regional compliance filings for Commission review, and not as an informational filing, and directed Avista, Puget Sound, and MATL to submit the Order No. 1000 Functional Agreement for review as part of their next regional compliance filings.⁴¹ On November 17, 2014, Avista, Puget Sound, and MATL submitted their third regional compliance filings, as well as the ColumbiaGrid Order No. 1000 Functional Agreement.⁴²

ii. Protests/Comments

22. Public Interest Organizations express concern that Columbia Grid Applicants have not included the consensus interregional compliance language as part of their tariff proposal, but instead file the language for informational purposes only. Public Interest Organizations state that while they appreciate the integral role of the PEFA in ColumbiaGrid regional planning and interregional coordination, filing the entirety of details for interregional coordination as an appendix to the PEFA instead of as part of the filing parties' tariffs does not ensure that the Commission will be able to approve key aspects of Order No. 1000 compliance. Public Interest Organizations request that the Commission require the ColumbiaGrid Applicants to file their proposals as tariff revisions.⁴³

iii. Commission Determination

23. We find that Western Filing Parties comply with the requirement to coordinate with the neighboring public utility transmission providers within its interconnection to implement the interregional transmission coordination requirements adopted in Order No. 1000 because each public utility transmission provider, through its regional transmission planning process, proposes procedures to coordinate with the public utility

⁴⁰ *Id.*

⁴¹ *Id.* P 23.

⁴² *See, e.g.,* Avista's November 17, 2014 filings in Docket Nos. ER13-94-004 and ER15-422-000. ColumbiaGrid Applicants' third Order No. 1000 regional compliance filings and the ColumbiaGrid Order No. 1000 Functional Agreement are currently pending before the Commission and will be addressed by separate order.

⁴³ Public Interest Organizations ColumbiaGrid Protest at 7-8.

transmission providers in each of its neighboring transmission planning regions within the Western Interconnection. Further, we find that by each public utility transmission provider in the Western Interconnection adopting the common tariff language, Western Filing Parties have complied with the Commission's directive that neighboring transmission planning regions work through their regional transmission planning processes to develop the same language to be included in each public utility transmission provider's tariff that describes the interregional transmission coordination procedures.⁴⁴ We accept the proposal of Western Filing Parties for their revised tariffs to become effective on October 1, 2015, with the exception of ColumbiaGrid Applicants, as discussed below.

24. Western Filing Parties' proposal to define an interregional transmission project as a proposed new transmission project that would directly interconnect electrically to existing or planned transmission facilities in two or more planning regions, and that would be submitted into the regional transmission planning process of all such planning regions, is consistent with the definition in Order No. 1000 that an interregional transmission facility is one that is located in two or more transmission planning regions.

25. We disagree with Public Interest Organizations' assertion that Columbia Grid Applicants have not included the consensus interregional compliance language as part of their tariff proposal, but have instead filed the language for informational purposes only. We note that ColumbiaGrid Applicants have submitted the common tariff language, as well as additional implementation and timing provisions, for Commission review as part their respective Attachment Ks.

26. We reject ColumbiaGrid Applicants' proposed effective date for their respective Attachment Ks, which they condition on the Fourth Restated PEFA becoming effective. First, we note that ColumbiaGrid Applicants have filed the Fourth Restated PEFA for informational purposes only; thus, it is unclear at what time the agreement will be executed, submitted to the Commission for acceptance, or become effective. Further, we note that in Avista's, Puget Sound's, and MATL's second regional compliance filings, these entities asserted that the Third Restated PEFA could not become effective unless the Commission granted rehearing of ColumbiaGrid's first regional Order No. 1000 order and stated that they would revert to the pre-Order No. 1000 PEFA and conduct Order No. 1000 transmission planning under a new Order No. 1000 Functional Agreement (Functional Agreement).⁴⁵ Thus, it is uncertain when, if ever, the proposed

⁴⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 415.

⁴⁵ *Avista Corp.*, 148 FERC ¶ 61,212 at P 12.

Attachment K revisions can become effective under ColumbiaGrid Applicant's proposed conditional effective date.

27. We also note that ColumbiaGrid Applicants' current Attachment Ks frequently reference the Fourth Restated PEFA. We find it unclear how ColumbiaGrid Applicants' interregional transmission coordination procedures and cost allocation, relying on the Fourth Restated PEFA, will be conducted, consistent with the Order No. 1000 regional processes under the new Functional Agreement. Thus, we direct Avista, Puget Sound, and MATL to make compliance filings, within 60 days of the date of issuance of this order to (1) establish an appropriate effective date for their respective Attachment Ks; (2) clarify the status of the Fourth Restated PEFA, specifically when or if it will be filed for Commission-approval; and (3) revise the references in their respective Attachment Ks to remove any references to the PEFA. Likewise, Bonneville Power should also submit a further compliance filing to address these issues.

b. Implementation of the Interregional Transmission Coordination Requirements

i. Data Exchange and Identifying Interregional Transmission Facilities

28. In Order No. 1000, the Commission required each public utility transmission provider to establish procedures with each of its neighboring transmission planning regions to coordinate and share the results of their respective regional transmission plans to identify interregional transmission facilities.⁴⁶ As part of this requirement, the

⁴⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). While the Commission required public utility transmission providers to establish further procedures with each of its neighboring transmission planning regions to coordinate and share the results of their respective regional transmission plans to identify possible interregional transmission facilities that could address regional transmission needs more efficiently or cost-effectively than separate regional transmission facilities, the Commission neither required nor precluded public utility transmission providers from conducting interregional transmission planning. *See, e.g.*, Order No. 1000, FERC Stat. & Regs. ¶ 31,323 at P 399 (clarifying that “the interregional transmission coordination requirements that [the Commission] adopt[s] do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan” and, “[t]o the extent that public utility transmission providers wish to participate in processes that lead to the development of interregional transmission plans, they may do so and, as relevant, rely on such processes to comply with the requirements of this Final Rule.”). The Commission also required that “the

(continued ...)

Commission required the public utility transmission providers to enhance their existing regional transmission planning process to provide for the identification of interregional transmission facilities that may be more efficient or cost-effective solutions to their respective regional transmission needs.⁴⁷ The Commission also required each public utility transmission provider to adopt interregional transmission coordination procedures that provide for the exchange of transmission planning data and information at least annually.⁴⁸ The Commission found that the interregional transmission coordination procedures must include the specific obligations for sharing transmission planning data and information rather than only an agreement to do so.⁴⁹ However, the Commission did not dictate the specific procedures or the level of detail for the procedures pursuant to which transmission planning data and information must be exchanged. The Commission allowed each public utility transmission provider to develop procedures to exchange transmission planning data and information, which the Commission anticipated would reflect the type and frequency of meetings that are appropriate for each pair of regions and will accommodate each pair of region's transmission planning cycles.⁵⁰

29. In addition, the Commission required the developer of an interregional transmission project to first propose its transmission project in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located.⁵¹ Thus, the Commission required that each public utility transmission provider explain in its OATT how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation.⁵²

developer of an interregional transmission project to first propose its transmission project in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located.” *Id.* P 436.

⁴⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 396 and; 398.

⁴⁸ *Id.* P 454.

⁴⁹ *Id.* P 455.

⁵⁰ *Id.*

⁵¹ *Id.* P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

⁵² *Id.* P 522.

(a) **Compliance Filings**

30. Western Filing Parties propose that, each year, the transmission planning regions will participate in an Annual Interregional Coordination Meeting.⁵³ Prior to the Annual Interregional Coordination Meeting, each transmission planning region will make available on its website or otherwise provide to each of the other transmission planning regions, to the extent such information is available in its regional transmission planning process, information relating to the regional transmission needs in its regional transmission planning region and the potential solutions, i.e., Annual Interregional Information.⁵⁴ Annual Interregional Information includes (1) the study plan or underlying information that would typically be included in a study plan, such as identification of base cases, planning study assumptions, and study methodologies; (2) initial study reports or system assessments; and (3) the regional transmission plan.⁵⁵

31. However, Western Filing Parties propose that each transmission planning region is not required to make available or otherwise provide to any other transmission planning region (1) any information not developed by a transmission planning region in the ordinary course of its regional transmission planning process, (2) any Annual Interregional Information to be provided by any other transmission planning region with respect to such other transmission planning region, or (3) any information if the transmission planning region reasonably determines that making such information available or otherwise providing such information would constitute a violation of the Commission's Standards of Conduct or any other legal requirement. In addition, they propose that any Annual Interregional Information made available or otherwise provided by a transmission planning region shall be "AS IS" and any reliance by the receiving transmission planning region on such Annual Interregional Information is at its own risk, without warranty and without any liability of the transmission planning region providing the information or any of the members of that transmission planning region, including

⁵³ Common Tariff, § 3 (Annual Interregional Coordination Meeting). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.3 (Annual Interregional Coordination Meeting).

⁵⁴ Common Tariff § 2 (Annual Interregional Information Exchange). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.2 (Annual Interregional Information Exchange).

⁵⁵ *Id.*

any liability for any errors or omissions in such Annual Interregional Information, or any delay or failure to provide such Annual Interregional Information.⁵⁶

32. Western Filing Parties propose that, at the Annual Interregional Coordination Meeting, topics discussed may include, among other things, identification and preliminary discussion of interregional solutions, including conceptual solutions, that may meet regional transmission needs in each of two or more transmission planning regions more efficiently or cost-effectively.⁵⁷

33. Western Filing Parties propose that a proponent of an interregional transmission project may seek to have its interregional transmission project jointly evaluated by the Relevant Planning Regions⁵⁸ by submitting the interregional transmission project into the regional transmission planning process of each Relevant Planning Region in accordance with such Relevant Planning Region's regional transmission planning process and no later than March 31 of any even-numbered calendar year.⁵⁹ Further, such proponent of an interregional transmission project seeking to connect to a transmission facility owned by multiple transmission owners in more than one transmission planning region must submit the interregional transmission project to each such transmission planning region in accordance with such transmission planning region's regional transmission planning process.⁶⁰ In addition to satisfying each Relevant Planning Region's information requirements, the proponent of an interregional transmission project must include, with

⁵⁶ *E.g.*, PacifiCorp OATT, Att. K, § 4.2.

⁵⁷ Common Tariff, § 3(ii). The Annual Interregional Coordination Meeting is also discussed below in the Transparency and Stakeholder Participation section of this order.

⁵⁸ A Relevant Planning Region is a transmission planning region that would directly interconnect electrically with an interregional transmission project, unless and until that transmission planning region determines that such interregional transmission project will not meet any of its regional transmission needs in accordance with its regional transmission planning process, at which time it will no longer be considered a Relevant Planning Region. Common Tariff § 1 (Definitions). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.1 (Definitions).

⁵⁹ Common Tariff § 4.1 (Submission Requirements). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.4.1 (Submission Requirements).

its submittal to each Relevant Planning Region, a list of all transmission planning regions to which the interregional transmission project is being submitted.⁶¹

34. In addition, CAISO proposes new tariff language to implement the interregional coordination process. CAISO intends to conduct its evaluation of interregional transmission projects in a two year cycle and proposes that starting at the beginning of the first even-numbered calendar year, CAISO will initiate a submission period in which proponents may request evaluation of an interregional transmission project.⁶² CAISO also proposes to clarify that the regional process will now provide an opportunity for project sponsors to submit interregional transmission projects into CAISO's process to be evaluated as potential regional solutions.⁶³

35. ColumbiaGrid Applicants also propose that a planning party or interregional transmission project proponent may seek to have its project evaluated in the ColumbiaGrid transmission planning region by submitting a written request for such evaluation to ColumbiaGrid; provided that ColumbiaGrid Applicants are to deem such written request properly submitted to ColumbiaGrid Applicants only if, and at such time as, ColumbiaGrid Applicants receive the written request and (1) such written request specifically references section 13.4 of Appendix A of the PEFA (consistent with section 4 of the common tariff language), and (2) such written request includes a list of all other planning regions to which the project is being submitted for joint evaluation.⁶⁴ ColumbiaGrid Applicants propose to confirm with each other Relevant Planning Region that such planning party or project proponent has submitted such project for evaluation into the regional transmission planning process of each other Relevant Planning Region in accordance with the regional transmission planning process of such Relevant Planning Region(s).⁶⁵ ColumbiaGrid Applicants propose that in the event that ColumbiaGrid

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.1 (Submission of Interregional Transmission Projects) (1.0.0).

⁶³ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.2(f) (Nature of the Transmission Planning Process) (4.0.0).

⁶⁴ *E.g.*, Avista, OATT, Attachment K, Part IV, § 14.2 (Submission for Joint Evaluation); Fourth Restated PEFA, Appendix A, § 14.2 (Submission for Joint Evaluation).

⁶⁵ *Id.*

Applicants are unable to confirm that the planning party or project proponent has submitted its project for evaluation into the regional transmission planning process of each other Relevant Planning Region in accordance with their respective regional transmission planning processes, ColumbiaGrid Applicants are to notify the planning party or project proponent in writing, and the planning party or project proponent is to have 30 days from the date of such notice to provide ColumbiaGrid Applicants evidence, reasonably acceptable to ColumbiaGrid Applicants, that the planning party or project proponent has timely submitted its project for evaluation to each other Relevant Planning Region.⁶⁶ If a planning party or project proponent fails to provide such evidence, the project is to be deemed withdrawn and is not to be eligible for evaluation.⁶⁷

36. ColumbiaGrid Applicants propose that any person that seeks to submit an interregional transmission project for joint evaluation or seeks to request Interregional Cost Allocation must either be a planning party or must enter into an Interregional Transmission Project Agreement (ITP Agreement) with ColumbiaGrid Applicants. They add that the ITP Agreement is to be substantially in the form attached to the PEFA as Appendix C.⁶⁸ The terms of the ITP Agreement direct a proponent seeking joint evaluation and interregional cost allocation to comply with specific provisions of the PEFA, including Appendix A (Transmission Planning Process), which includes provisions that are consistent with those contained in ColumbiaGrid Applicants' respective Attachment Ks.⁶⁹

37. The ITP Agreement provides that upon its execution, the project proponent(s) shall pay to ColumbiaGrid Applicants a total amount equal to \$50,000; provided, however, that such payment requirement shall be waived if any project proponent is enrolled in a transmission planning region, other than ColumbiaGrid, that performs transmission planning in the Western Interconnection that similarly waives or does not impose any payment requirement for entities enrolled in ColumbiaGrid that seek joint evaluation or cost allocation for an interregional transmission project in such

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.1 (ITP Agreement); Fourth Restated PEFA, Appendix A, § 14.1 (ITP Agreement).

⁶⁹ *E.g.*, Avista, Fourth Restated PEFA, Appendix C, § 4 (Joint Evaluation and Order 1000 No. Cost Allocation).

transmission planning region.⁷⁰ The ITP Agreement further provides that, pursuant to section 14.3 of Appendix A of the PEFA (consistent with 14.3 of attachment K), the project proponent that submitted the interregional transmission project is to assume primary responsibility for leading and performing necessary analytical work for such interregional transmission project in the study team.⁷¹

(b) Protests/Comments

38. AWEA states that Western Filing Parties propose a reactive process that seeks to evaluate only those transmission solutions or interregional transmission projects that have been proposed in the regional transmission planning processes. AWEA believes that the Commission intended for the most efficient and cost-effective solutions to be identified, regardless of whether such solutions are submitted by stakeholders, transmission owners, or providers. AWEA argues that Western Filing Parties' proposal must also detail how it will consider whether the regional solutions identified by each transmission planning region are the most efficient and cost-effective solutions, or whether interregional solutions may be more cost-effective for ratepayers.⁷² AWEA asserts that this evaluation should be proactive and not simply consider those interregional transmission projects already identified.⁷³ AWEA states that it is unclear what is meant by the term "conceptual solutions" in section 3.ii of the common tariff language but notes that this might be an opportunity to initiate discussion and evaluation of potential solutions that have not been submitted in the regional transmission planning processes.⁷⁴

39. AWEA asserts that it is not clear whether stakeholders must submit to a regional transmission planning process a well-defined transmission project or whether stakeholders may instead submit an identified transmission need such as a location where there is an excessive curtailment problem or concerns about high levels of economic congestion.⁷⁵ AWEA argues that for stakeholders who do not have transmission planners

⁷⁰ *E.g.*, Avista, Fourth Restated PEFA, Appendix C, § 3 (Payment).

⁷¹ *E.g.*, Avista, Fourth Restated PEFA, Appendix C, § 4 (Joint Evaluation and Order 1000 Cost Allocation).

⁷² AWEA Western Comments at 9-10.

⁷³ *Id.* at 10.

⁷⁴ *Id.*

⁷⁵ *Id.* at 8.

on staff, the latter is a critical option needed to ensure their full participation in the interregional process because not all stakeholders will be able to identify the particular interregional transmission project that will solve the identified transmission need.⁷⁶ AWEA requests that the Commission require Western Filing Parties to provide more detail regarding what may be submitted as an interregional transmission project and to allow for stakeholders to submit transmission issues or conceptual transmission solutions rather than a well-defined transmission project for consideration in the joint interregional evaluation.⁷⁷

40. AWEA further asserts that ColumbiaGrid's requirements to propose an interregional transmission project are unjust and unreasonable.⁷⁸ AWEA states that the ITP Agreement requires an interregional transmission project proponent, other than those who are members of other western planning regions, to pay \$50,000.⁷⁹ AWEA argues that such payments will create barriers to third party participation, especially if proponents of interregional transmission projects are stakeholders such as AWEA or other public interest organizations who will not receive revenue from construction of an interregional transmission project and are typically non-profits.⁸⁰

(c) Answers

41. ColumbiaGrid Answering Parties⁸¹ state that to the extent AWEA is requesting that the Commission require joint evaluation among planning regions of conceptual solutions, AWEA's request is inconsistent with Order No. 1000, which only requires joint evaluation of proposed projects.⁸² ColumbiaGrid Answering Parties also state that

⁷⁶ *Id.*

⁷⁷ *Id.*

⁷⁸ AWEA ColumbiaGrid Comments at 10.

⁷⁹ *Id.* at 11.

⁸⁰ *Id.*

⁸¹ MATL did not file the August 20 Answer along with the other ColumbiaGrid Applicants. Herein ColumbiaGrid Answering Parties will be used to represent Avista, Puget Sound, and Bonneville Power.

⁸² ColumbiaGrid Answering Parties Answer at 8 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

stakeholders have the opportunity to suggest conceptual solutions at the Annual Interregional Coordination Meeting, in the annual system assessment and in the study teams, which develop plans of service to address needs.⁸³ ColumbiaGrid Answering Parties add that although stakeholders may raise and discuss transmission issues and conceptual solutions at the Annual Interregional Coordination Meeting, interregional solutions must ultimately meet regional needs.⁸⁴ Therefore, ColumbiaGrid Answering Parties assert that it is appropriate that stakeholders pursue interregional issues and conceptual solutions in regional transmission planning processes.⁸⁵

42. ColumbiaGrid Answering Parties respond that the requirement of signing the ITP Agreement and making \$50,000 payment puts interregional transmission project proponents on the same footing, for purposes of project consideration by the ColumbiaGrid regional planning process, regardless of whether or not they are PEFA Planning Parties.⁸⁶ Further, ColumbiaGrid Answering Parties state, the Commission has determined that it is reasonable for a regional project sponsor requesting Order No. 1000 cost allocation to sign the PEFA to “ensure that the structure of the regional transmission planning process and the terms and conditions for studying transmission projects will apply in a not unduly discriminatory manner to new entrants and the existing planning parties and ColumbiaGrid.”⁸⁷ ColumbiaGrid Answering Parties add that the Commission also determined that it is reasonable that a transmission developer be required to pay a share of ColumbiaGrid’s cost.⁸⁸ ColumbiaGrid Answering Parties assert that the same rationale applies to consideration of interregional transmission projects as to consideration of regional needs, and it would be inconsistent with the Order No. 1000 goal of eliminating free ridership to require the PEFA planning parties to absorb ColumbiaGrid planning costs with no contribution by the interregional transmission project proponent.

⁸³ *Id.* at 14.

⁸⁴ *Id.* at 9 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 512).

⁸⁵ *Id.*

⁸⁶ *Id.* at 12-13.

⁸⁷ *Id.* at 13 (citing *Avista Corp.*, 143 FERC ¶ 61,255 at P 181).

⁸⁸ *Id.*

(d) **Commission Determination**

43. We find that the proposed procedures and specific obligations specified in Western Filing Parties' interregional compliance filings comply with the requirements of Order No. 1000 to coordinate and share the results of the respective regional transmission plans to identify interregional transmission facilities, to provide for the exchange of transmission planning data and information, and to explain how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation. Likewise, we find that Bonneville Power's proposed revisions to its OATT substantially conform or are superior to the *pro forma* OATT, as modified by Order No. 1000.

44. Western Filing Parties' proposal to require each transmission planning region to annually provide specific Annual Interregional Information, including its regional transmission plan, to each of the other transmission planning regions complies with the Commission's directives to establish procedures to coordinate and share the results of the regional transmission plans and to provide for the exchange of transmission planning data and information at least annually. Western Filing Parties also propose specific obligations for sharing transmission planning data and information rather than only an agreement to do so.

45. Under Western Filing Parties' proposal, after sharing the results of their respective regional transmission plans, the transmission planning regions will have an opportunity at the Annual Interregional Coordination Meeting to identify interregional transmission solutions, including conceptual solutions that may meet regional transmission needs in each of two or more transmission planning regions more efficiently or cost-effectively.⁸⁹ We find that this proposal complies with the Commission's directive to establish coordination procedures to identify interregional transmission facilities that may be more efficient or cost-effective solutions to regional transmission needs.

46. We address next AWEA's argument that Western Filing Parties propose a reactive process that evaluates only those interregional transmission facilities that have been proposed in the regional transmission planning processes, while the process should be proactive and should not simply consider interregional transmission facilities already identified. First, we clarify for AWEA, as noted by ColumbiaGrid Applicants,⁹⁰ that under the proposed procedures, at the Annual Interregional Coordination meeting, the transmission planning regions can identify interregional transmission facilities that are

⁸⁹ Common Tariff, § 3(ii).

⁹⁰ See ColumbiaGrid Answering Parties Answer at 8.

included in the transmission planning regions' respective regional transmission plans and can also identify other transmission needs that have not yet been proposed in the regional transmission planning processes. Second, we disagree that Western Filing Parties' process for identifying potential interregional transmission facilities does not comply with Order No. 1000. Order No. 1000 permits public utility transmission providers, through their regional transmission planning processes, to rely exclusively on proposals from transmission developers and stakeholders proposed in the regional transmission planning processes as their means to identify more efficient or cost-effective *interregional* transmission solutions to regional transmission needs.⁹¹

47. We find that Western Filing Parties have explained how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation. Western Filing Parties make clear that a proponent of an interregional transmission facility may seek to have its interregional transmission facility jointly evaluated by the Relevant Planning Regions by submitting the interregional transmission facility into the regional transmission planning process of each Relevant Planning Region.⁹² In response to AWEA's request that the Commission direct Western Filing Parties to allow stakeholders to submit transmission issues or conceptual transmission solutions rather than a transmission facility that satisfies the applicable regional information requirements for consideration in a regional transmission planning process, we decline to require such clarification. We note that stakeholders have the opportunity to suggest conceptual solutions at the Annual Interregional Coordination Meeting⁹³ and

⁹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 399 (“the interregional transmission coordination requirements that we adopt do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan. Rather, our requirement is for public utility transmission providers to consider whether the local and regional transmission planning processes result in transmission plans that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions.”).

⁹² Common Tariff, § 4.1 (Submission Requirements). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.4.1 (Submission Requirements).

⁹³ Common Tariff, § 3 (Annual Interregional Coordination Meeting).

in the regional transmission planning processes.⁹⁴ In any event, Order No. 1000 requires a description of how stakeholders and transmission developers can propose interregional transmission facilities, not conceptual solutions, to be evaluated jointly.⁹⁵

48. Finally, we find that CAISO's and ColumbiaGrid Applicants' additional provisions describing how interregional transmission facilities can be submitted in their respective regional processes are reasonable. We reject AWEA's challenge to ColumbiaGrid's proposed expansion of the PEFA to include interregional transmission facilities. The Commission has previously found the PEFA provisions, including the \$50,000 payment obligation, just and reasonable.⁹⁶ As previously explained, the requirement that any transmission developer who intends to sponsor a transmission facility in the ColumbiaGrid transmission planning region must execute the PEFA will ensure that the structure of the regional transmission planning process and the terms and conditions for studying transmission facilities will apply in a not unduly discriminatory manner to new entrants and existing signatories and ColumbiaGrid.⁹⁷

ii. Procedure for Joint Evaluation

49. In Order No. 1000, the Commission required each public utility transmission provider to establish procedures with each of its neighboring transmission planning regions in its interconnection to jointly evaluate interregional transmission facilities.⁹⁸ The submission of an interregional transmission project in each regional transmission planning process will trigger the procedure under which the public utility transmission

⁹⁴ For instance, ColumbiaGrid Answering Parties note that stakeholders can propose conceptual solutions in its regional annual system assessment and in the study teams which develop plans of service to address needs. ColumbiaGrid Answering Parties Answer at 14.

⁹⁵ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

⁹⁶ *Avista Corp.*, 143 FERC ¶ 61,255, at PP 181 & 183 (2013).

⁹⁷ *Id.*

⁹⁸ Order No. 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). *See also* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 435. As explained in the previous section of this order, a developer must first propose an interregional transmission project in each regional transmission planning processes in which the transmission facility is proposed to be located.

providers, acting through their regional transmission planning processes, will jointly evaluate the proposed transmission project.⁹⁹

50. The Commission required that joint evaluation be conducted in the same general timeframe as, rather than subsequent to, each transmission planning region's individual consideration of the proposed interregional transmission project.¹⁰⁰ The Commission explained that, to meet the requirement to conduct the joint evaluation in the same general time frame, it expected public utility transmission providers to develop a timeline that provides a meaningful opportunity to review and evaluate through the interregional transmission coordination procedures information developed through the regional transmission planning process and, similarly, provides a meaningful opportunity to review and use in the regional transmission planning process information developed in the interregional transmission coordination procedures.¹⁰¹

51. In addition, the Commission required that the interregional compliance filing by public utility transmission providers in neighboring transmission planning regions include a description of the types of transmission studies that will be conducted to evaluate conditions on their neighboring transmission systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities.¹⁰² Additionally, the Commission directed each public utility transmission provider to develop procedures by which differences in the data, models, assumptions, transmission planning horizons, and criteria used to study a proposed interregional transmission project can be identified and resolved for purposes of jointly evaluating a proposed interregional transmission facility.¹⁰³

⁹⁹ *Id.* P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

¹⁰⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 506 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439).

¹⁰¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439. Order No. 1000 does not require that interregional transmission projects be evaluated simultaneously by both regions or in joint sessions of both regions' stakeholders. Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 438.

¹⁰² *Id.* P 398; Order No. 1000-A, 139 FERC ¶ 61,132 at P 493. The Commission did not require any particular type of studies be conducted. *Id.*

¹⁰³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 506, 510.

(a) **Compliance Filings**

52. Western Filing Parties propose that for consideration and joint evaluation in the interregional transmission planning process, the proponent of an interregional transmission project must submit the project to the Relevant Planning Regions no later than March 31 of any even numbered calendar year in accordance with the requirements of each Planning Region's regional transmission planning process. In its submittal, to facilitate joint evaluation, the interregional transmission project proponent must include a list of all Planning Regions to which the project is submitted.¹⁰⁴ Under the proposal, the Relevant Planning Regions are to initiate joint evaluation of the proposed interregional transmission project in conjunction with their individual consideration of the proposed project pursuant to their regional transmission planning processes. For each interregional transmission project that has been properly submitted into the regional transmission process of each Relevant Planning Region, a Relevant Planning Region will participate in a joint evaluation with the other Relevant Planning Region(s) to commence in the calendar year of the interregional transmission project's submittal or immediately following the calendar year.¹⁰⁵

53. When conducting the joint evaluation, the Relevant Planning Region will confer with the other Relevant Planning Regions regarding the following (1) interregional transmission project data and projected interregional transmission project costs, and (2) the study assumptions and methodologies it is to use in evaluating the interregional transmission project pursuant to its regional transmission planning process.¹⁰⁶ The Relevant Planning Regions are to identify the appropriate transmission studies in each of their regional planning processes, based in part upon a consideration of experiences in prior planning cycles and the availability of new transmission study tools.¹⁰⁷ Under the proposal, the Relevant Planning Region will seek to resolve any differences it has with the other Relevant Planning Regions relating to the interregional transmission project or to information specific to other Relevant Planning Regions to the extent such differences may affect the transmission planning region's evaluation of the interregional transmission

¹⁰⁴ Common Tariff § 4.1. *E.g.*, PacifiCorp OATT, Attachment K, § 4.4.1.

¹⁰⁵ Common Tariff § 4.2 (Joint Evaluation of an ITP). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.4.2 (Joint Evaluation of an ITP).

¹⁰⁶ Common Tariff § 4.2. *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2.

¹⁰⁷ CAISO Transmittal Letter at 20.

project.¹⁰⁸ During the second year of the interregional transmission planning process, each Relevant Planning Region is to determine if under its regional transmission planning process if such interregional transmission project is a more efficient or cost-effective solution to one or more of the transmission planning region's regional transmission needs.¹⁰⁹ If the Relevant Planning Region determines that the interregional transmission project will not meet any of its regional transmission needs, it is required to notify the other Relevant Planning Regions, and thereafter the transmission planning region would have no obligation to participate in the joint evaluation of the interregional transmission project.¹¹⁰ In addition, the proposal requires the transmission planning region to provide stakeholders with an opportunity to participate in its regional transmission planning process.¹¹¹

54. In addition to submitting the common tariff language for Commission review, CAISO and ColumbiaGrid Applicants have submitted additional implementation and timing provisions in their revised tariffs to facilitate the incorporation of the common tariff language into their respective transmission planning processes.

55. CAISO proposes new tariff language to implement the interregional coordination process. CAISO intends to conduct its evaluation of interregional transmission projects in a two year cycle but may conclude the evaluation earlier if the Relevant Planning Regions complete their assessments in time for an earlier decision.¹¹² During the planning cycle in which an interregional transmission project is submitted, CAISO will make a preliminary assessment as to whether the submitted project could potentially meet a regional transmission need by eliminating or deferring the need for a regional transmission solution. CAISO will then develop an initial estimate of the benefits of the interregional transmission project in terms of the estimated avoided costs of the regional transmission project for which it eliminates or defers the regional need. If the interregional transmission project could potentially meet a regional need more cost-effectively and efficiently than that regional transmission solution, CAISO will confer with the Relevant Planning Regions to determine the assignment of interregional

¹⁰⁸ Common Tariff § 4.2(a). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(a).

¹⁰⁹ Common Tariff § 4.2(d). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(d).

¹¹⁰ Common Tariff § 4.2(c). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(c).

¹¹¹ Common Tariff § 4.2(b). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(b).

¹¹² California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17 (Evaluation of Interregional Transmission Projects) (1.0.0).

transmission project costs to CAISO. Based on this initial assessment of interregional project benefits, CAISO's cost share assignment and the urgency of the need for a regional transmission solution, CAISO will determine whether to further evaluate the project during the next planning cycle. If CAISO determines that the need for the regional solution is not urgent, CAISO will defer approval of the regional solution until the interregional transmission project assessment is conducted in the second cycle.¹¹³

56. CAISO also proposes that during the second planning cycle after an interregional transmission project is submitted, CAISO will conduct a more in-depth analysis of the interregional transmission project. If CAISO determines that the proposed interregional transmission project is a more efficient or cost-effective solution to a regional need and the project can be constructed and operational in the same timeframe as the regional solution, CAISO will recommend it for approval by CAISO's Governing Board in the comprehensive transmission plan. Once the interregional transmission project is selected in CAISO's comprehensive transmission plan and the transmission plans of all Relevant Planning Regions, CAISO will coordinate with the project proponent, the other Relevant Planning regions, and all affected transmission providers to address implementation issues, such as project financing, cost overruns, ownership and construction, operational control, and other matters related to the project.¹¹⁴

57. CAISO also proposes new tariff language that describes the steps that CAISO will take to monitor the progress of an interregional transmission project that has been selected in CAISO's transmission plan. If CAISO determines that an interregional transmission project has been delayed beyond the regional solution need date, CAISO will take steps to address potential NERC reliability concerns and possibly to select a regional solution that would supplant the interregional transmission project.¹¹⁵ CAISO will use best efforts to select a regional solution in the same planning cycle in which the interregional transmission project was found to be delayed beyond the regional need

¹¹³ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.2 (Interregional Transmission Project Assessment) (1.0.0).

¹¹⁴ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.3 (Selection in the Comprehensive Transmission Plan) (1.0.0).

¹¹⁵ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.5 (Monitoring the Status of Interregional Transmission Projects) (1.0.0).

date.¹¹⁶ Lastly, CAISO proposes to clarify that it will consider the Annual Interregional Information in the development of the unified planning assumptions and study plan.¹¹⁷

58. ColumbiaGrid Applicants propose that prior to commencing the joint evaluation of an interregional transmission project, ColumbiaGrid Applicants are to require a project proponent that is seeking such evaluation to submit to ColumbiaGrid Applicants information in accordance with section 10.1.2.1(ii)b. of Appendix A of the PEFA (Order No. 1000 Project Selection Criteria) (consistent with section 10.1.2.1(ii)b of Attachment K), which, to the extent permitted by law, is to include a copy of all interregional transmission project data being submitted by the planning party or a project proponent to any of the other Relevant Planning Regions for such project.¹¹⁸

59. ColumbiaGrid Applicants propose that upon receipt of a properly submitted request for such evaluation they are to convene a study team, or refer such interregional transmission project to an existing study team, for development.¹¹⁹ ColumbiaGrid Applicants propose that the planning party or project proponent that submitted the project is to assume primary responsibility for leading and performing necessary analytical work for such project in the study team.¹²⁰

(b) Protests/Comments

60. Public Interest Organizations comment that the proposal fails to include a process for the joint study of potential interregional projects.¹²¹ Public Interest Organizations

¹¹⁶ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.6 (Delay in Interregional Transmission Project In Service Date) (1.0.0).

¹¹⁷ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.3.1(m) (Inputs to the Unified Planning Assumptions and Study Plan) (4.0.0).

¹¹⁸ *E.g.*, Avista, OATT, Attachment K, Part IV, § 14.2 (Submission for Joint Evaluation); Fourth Restated PEFA, Appendix A, § 14.2 (Submission for Joint Evaluation).

¹¹⁹ *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.3 (Joint Evaluation Implementation); Fourth Restated PEFA, Appendix A, § 14.3 (Joint Evaluation Implementation).

¹²⁰ *E.g.*, *id.*

¹²¹ Public Interest Organizations Western Protest at 13.

contend that the common tariff language does not include a description of the methods the regions will use, and the types of transmission studies the regions will employ, to satisfy the obligation to jointly evaluate potentially more efficient or cost-effective interregional transmission projects.¹²² Public Interest Organizations request that the Commission require Western Filing Parties to devise a joint study process that will satisfy Order No. 1000's obligations by addressing how the regions will handle interregional transmission projects that are proposed, at least in part, to address public policy-driven projects in the CAISO region or in other areas in which explicit planning takes place for public policy-driven transmission projects.¹²³

61. SDG&E asserts that, other than exchanging information and holding an annual coordination meeting at which a vague list of topics might be discussed, the interregional compliance filings provide no explanation of how the four regions' transmission planning processes will be coordinated.¹²⁴ SDG&E asserts that, to meet the intent of Order No. 1000, the regions must undertake a tariff obligation to form interregional study teams that would conduct "joint evaluations" of proposed interregional transmission projects.¹²⁵ SDG&E adds that much of its concern would be addressed by formally involving the Western Electricity Coordination Council Transmission Expansion Planning Policy Committee (WECC TEPPC) and imposing a tariff obligation to form joint interregional transmission planning groups bearing greater duties than proposed under the compliance filings.¹²⁶

62. AWEA also argues that Western Filing Parties' proposal does not contain a joint evaluation process.¹²⁷ Instead, according to AWEA, each Relevant Planning Region will evaluate the interregional transmission project within its own regional study process to determine if the project meets regional needs.¹²⁸ AWEA adds that the four western regions should continue their process for harmonizing study models and develop one

¹²² *Id.* at 14.

¹²³ *Id.*

¹²⁴ SDG&E Protest at 10.

¹²⁵ *Id.* at 12.

¹²⁶ *Id.* at 11.

¹²⁷ AWEA ColumbiaGrid Comments at 5-6.

¹²⁸ *Id.* at 6.

agreed-upon model with agreed-upon future scenarios that can then be used to develop one set of interregional study results.¹²⁹

63. Similarly, Public Interest Organizations comment that the proposal falls short of the Commission's requirement to develop procedures for the identification and resolution of differences in data, assumptions and modeling methodologies.¹³⁰ Public Interest Organizations suggest that the Commission require Western Filing Parties to provide more specifics about how they will seek to harmonize data differences with their neighboring regions.¹³¹ Public Interest Organizations also state that the U.S. Department of Energy-funded transmission planning initiatives in the Western Interconnection would be an ideal forum for harmonized interregional data exchange.¹³²

64. Public Interest Organizations argue that the proposal's "unilateral opt-out" provision, which permits the transmission planning region not to participate in joint evaluation if the region determines that the proposed interregional transmission project will not meet any of its regional transmission needs, is not based on an objective criteria, jeopardizes the intent of the joint evaluation requirement, and may have the unintended consequence of undermining the joint evaluation obligation if a region does not like a project for any reason at all.¹³³ Public Interest Organizations assert that the Commission should require a revision in the proposal to provide a level of interregional verification, or at least include some set of criteria, by which the regions may determine that the project will not meet any of its transmission needs, as a backstop, to ensure the provision does not undermine Order No. 1000's intent.¹³⁴

65. With respect to CAISO's proposal to address implementation details only after an interregional transmission project has been selected in the regional transmission plans for all the Relevant Regions,¹³⁵ SoCal Edison asserts that, because implementation details

¹²⁹ *Id.* at 7.

¹³⁰ Public Interest Organizations Western Protest at 17.

¹³¹ *Id.* at 18.

¹³² *Id.*

¹³³ *Id.* at 14.

¹³⁴ *Id.* at 15.

¹³⁵ CAISO Tariff, § 24.17.3 (Selection in the Comprehensive Transmission Plan) ("Once an Interregional Transmission Project has been selected in the CAISO

such as project financing, cost overruns, ownership structure, and construction will greatly impact project costs, delaying resolution of these details creates a high level of uncertainty, causing interregional projects to become more risky than regional projects.¹³⁶ SDG&E argues that CAISO's proposed tariff language fails to adequately describe the implementation details and creates uncertainty by leaving too many open questions, such as the following: what if the two regions disagree on the projected costs; what happens if the actual costs are more or less than the projected costs, and; what happens if the Commission disallows a portion of the actual costs in subsequent ratemaking proceedings?¹³⁷ SoCal Edison contends that early resolution of implementation details is vital to enable an accurate valuation of an interregional project. Conversely, SoCal Edison argues, deferral of important implementation details can delay resolution of contentious issues that may not be able to be resolved at a later date.¹³⁸ SDG&E states that, while not every implementation detail needs to be included in the tariff language, the tariff language should provide an implementation framework so that stakeholders and the Commission can make reasonable judgments as to the overall workability of the compliance filing.¹³⁹

66. Further, SoCal Edison states that if an interregional transmission project has stalled there is no certainty that a foregone regional project can be constructed in a timely and cost-effective manner, which could create a risk that an identified need, including a reliability need, will not be met by the date needed.¹⁴⁰ As a result, SoCal Edison recommends that CAISO require interregional transmission project negotiations to be completed at least seven years prior to the date the project is needed.¹⁴¹ SoCal Edison

comprehensive Transmission Plan and the transmission plans of all Relevant Planning Regions, the CAISO will seek to coordinate with the project proponent, the other Relevant Planning Regions and all affected transmission providers to address project implementation issues, including, project financing, cost overruns, ownership and construction, operational control, scheduling rights and other matters related to the Interregional Transmission Project.”)

¹³⁶ SoCal Edison Protest at 5-6.

¹³⁷ SDG&E Protest at 16.

¹³⁸ SoCal Edison Protest at 5-6.

¹³⁹ SDG&E Protest at 16.

¹⁴⁰ SoCal Edison Protest at 8.

¹⁴¹ *Id.*

states that seven years is the average length of time it takes to complete such a project and that this will ensure that implementation details are addressed and leaves sufficient time for CAISO to develop a regional or local project if the interregional project fails to move forward.¹⁴²

67. AWEA argues that ColumbiaGrid Applicants' requirement that an entity that submits an interregional transmission project is to assume primary responsibility for leading and performing necessary analytical work for the interregional transmission project in the study team is unreasonable.¹⁴³ AWEA argues that it is the responsibility of transmission providers under Order No. 1000 to ensure that the most efficient and cost-effective transmission solutions are identified and evaluated and that it is not a requirement for stakeholders, especially stakeholders that are not transmission developers.¹⁴⁴

(c) Answers

68. Western Answering Parties¹⁴⁵ disagree with the Public Interest Organizations that Western Filing Parties' proposal does not provide for joint evaluation of interregional transmission projects.¹⁴⁶ Western Answering Parties argue that the interregional coordination requirement in Order No. 1000 contemplates multiple parties sharing information and evaluating the same interregional transmission project, as in Western Filing Parties' proposal.¹⁴⁷ In support, Western Answering Parties state that Order No. 1000 clearly does not create a separate interregional planning process in which regional entities would form committees or similar multi-party mechanisms to evaluate projects.¹⁴⁸ Western Answering Parties likewise assert that Order No. 1000 does not impose a second level of interregional transmission planning process on top of the

¹⁴² *Id.*

¹⁴³ AWEA ColumbiaGrid Comments at 11.

¹⁴⁴ *Id.*

¹⁴⁵ ColumbiaGrid Applicants did not file answers along with the other Western Filing Parties. Herein Western Answering Parties will be used to represent the public utility transmission providers in the CAISO, NTTG and WestConnect regions.

¹⁴⁶ Western Answering Parties Second Answer at 5-6.

¹⁴⁷ *Id.* at 6.

¹⁴⁸ *Id.* (referencing Order No. 1000-A, 139 FERC ¶ 61,132 at P 511).

regional transmission planning process, with duplicative assessments of needs and benefits.¹⁴⁹ They add that, in Order No. 1000-A, the Commission specifically rejected requests to require top-down interregional transmission planning.¹⁵⁰

69. In response to SDG&E's argument that Western Answering Parties' interregional transmission planning process does not constitute meaningful joint evaluation, Western Answering Parties contend that Order No. 1000 required only an interregional coordination process—not an interregional planning process.¹⁵¹ In support, Western Answering Parties point to language in Order No. 1000 which states that the interregional transmission coordination requirements “do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan.”¹⁵² Instead, Western Answering Parties assert that Order No. 1000 imposed two requirements on the interregional process (1) coordination and evaluation, and (2) data exchange and transparency. Western Answering Parties assert that their proposed process includes these elements. Therefore, they contend that SDG&E's comments that the interregional process should involve outside organizations, such as WECC, and include formal planning groups, dispute resolution procedures, and study plans, exceed the scope of Order No. 1000.¹⁵³ Western Answering Parties also argue that SDG&E's suggestions are counterproductive and would delay and interfere with the regional planning processes.¹⁵⁴

70. ColumbiaGrid Applicants state that AWEA's assertion that the Commission should require common study models and assumptions for joint evaluation was specifically rejected in Order No. 1000-A.¹⁵⁵ ColumbiaGrid Applicants state that Order No. 1000 does not require that the entire Western Interconnection be in one planning

¹⁴⁹ *Id.* at 6-7.

¹⁵⁰ *Id.* at 7 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 512).

¹⁵¹ *Id.* at 4-5.

¹⁵² *Id.* at 5 (quoting Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 399).

¹⁵³ *Id.* at 5-6.

¹⁵⁴ *Id.*

¹⁵⁵ ColumbiaGrid Answering Parties Second Answer at 7 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 510).

region and that the determination of whether transmission facilities would meet the needs of a planning region is to be made by that planning region.

71. With respect to the Public Interest Organizations' arguments about harmonization of data, Western Answering Parties argue that Order No. 1000 stressed that it was providing flexibility for regions to develop procedures that work for them.¹⁵⁶ They explain that, because of the differences in each region's regional transmission planning procedures, including timing, it is best to simply require efforts to reconcile differences and to allow the relevant transmission planning regions to work out the mechanisms for doing so on an individualized basis.¹⁵⁷ Western Answering Parties argue that their proposal complies with the flexible framework provided by Order No. 1000.¹⁵⁸

72. In response to Public Interest Organizations' protest of the "unilateral opt-out" provision and request for a level of interregional verification to ensure the interregional transmission project will not meet any of the regions' respective transmission needs, Western Answering Parties state that these arguments are a collateral attack on Orders Nos. 1000 and 1000-A.¹⁵⁹ First, Western Filing Parties contend that the Commission has stated that the decision whether to include an interregional transmission project in a regional transmission plan for purposes of interregional cost allocation is a decision to be made by each region through its regional transmission planning process.¹⁶⁰ Western Filing Parties note, however, that the Commission did not impose any conditions on a region's decision to reject such allocation under its respective regional transmission planning process, or require that an interregional body must be created to validate regional determinations.¹⁶¹ Western Filing Parties also state that since each region has adopted an open and transparent planning process, the basis for this decision will be available to stakeholders, and be challengeable by stakeholders, during the regional transmission planning processes.¹⁶² Moreover, Western Filing Parties argue that, in Order No. 1000-A, the Commission specifically rejected requests that it require

¹⁵⁶ Western Answering Parties Second Answer at 11-12.

¹⁵⁷ *Id.* at 12.

¹⁵⁸ *Id.*

¹⁵⁹ *Id.* at 7-8.

¹⁶⁰ Western Answering Parties First Answer at 11.

¹⁶¹ Western Answering Parties Second Answer at 7-8.

¹⁶² *Id.*

interregional planning or the preparation and approval of an interregional plan and requests to require a mechanism for the Commission to review failures to act on a proposed interregional facility.¹⁶³

73. ColumbiaGrid Answering Parties answer that, contrary to AWEA's assertion, no stakeholder is required to sign an ITP Agreement or conduct any analytical work in order to have ColumbiaGrid consider a conceptual solution.¹⁶⁴ ColumbiaGrid adds that in the event an interregional transmission proponent or planning party is required to assume primary responsibility for leading and performing necessary analytical work for such project in the study team, primary responsibility does not mean sole responsibility for such work. For instance, they note that a transmission owner or operator will play a substantial role in analyzing the interregional transmission project in the study team if that project is a proposed solution to the transmission owner or operator's transmission need.¹⁶⁵

74. In response to SoCal Edison and SDG&E's concerns regarding implementation, Western Answering Parties state that the resolution of matters relating to project financing, cost overruns, ownership and construction, operational control, and scheduling rights, is not a necessary part of either the coordination and evaluation, or data exchange and transparency interregional requirements of Order No. 1000. They state that these issues are beyond the scope of Order No. 1000 and, thus, Order No. 1000 does not require the resolution of such issues in an interregional coordination process.¹⁶⁶ Finally, Western Answering Parties disagree with SoCal Edison's recommendation that, for reliability projects, at a minimum, CAISO should require interregional transmission project negotiations to be completed at least seven years prior to the date the project is needed. Western Answering Parties state that Order No. 1000 does not mandate such a timeline.¹⁶⁷

¹⁶³ *Id.* at 8 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at PP 511-512).

¹⁶⁴ ColumbiaGrid Answering Parties First Answer at 15.

¹⁶⁵ *Id.*

¹⁶⁶ Western Answering Parties First Answer at 6-7.

¹⁶⁷ *Id.* at 14-15.

(d) Commission Determination

75. We find that Western Filing Parties' proposal complies with the requirements of Order No. 1000 to establish procedures to jointly evaluate interregional transmission facilities; to conduct joint evaluation in the same general timeframe as each transmission planning region's individual consideration of the proposed interregional transmission facility; to include a description of the types of transmission studies that will be conducted to evaluate conditions on neighboring transmission systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities; and to establish procedures to identify and resolve differences in data, models, assumptions, planning horizons, and criteria used to study a proposed interregional transmission facility for purposes of joint evaluation. Likewise, we find that Bonneville Power's proposed revisions to its OATT substantially conform or are superior to the *pro forma* OATT, as modified by Order No. 1000.

76. Under Western Filing Parties' proposal, an interregional transmission facility must be submitted into the transmission planning process of each Relevant Planning Region to be jointly evaluated by Western Filing Parties.¹⁶⁸ This requirement complies with the Order No. 1000 directive that the developer of an interregional transmission facility must first propose its transmission project in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located.¹⁶⁹ Once an interregional transmission project has been properly submitted, the Relevant Planning Regions confer on project data and projected costs, as well as the study assumptions and methodologies that will be used to evaluate the interregional transmission facility in their respective regional transmission planning processes. The Relevant Planning Regions seek to resolve any differences that might affect their respective evaluation of the interregional transmission facility, and they will determine under their respective regional transmission planning processes whether the interregional transmission facility is a more efficient or cost-effective solution to one or more of their

¹⁶⁸ Common Tariff § 4.1. *See, e.g.*, PacifiCorp OATT, Attachment K, § 4.4.1. CAISO specifies in its proposal that it will initiate a submission period in which proponents may request evaluation of an interregional transmission project. If the interregional transmission project is approved in CAISO's regional transmission plan, then a project sponsor will be selected in accordance with CAISO's competitive solicitation process. California Independent System Operator Corporation, CAISO eTariff (OATT), §§ 24.13 (Interregional Transmission Proposals in the Regional Process), 24.17.1 (Submission of Interregional Transmission Projects) (1.0.0).

¹⁶⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

respective regional transmission needs. Thus, we find that Western Filing Parties have proposed procedures to jointly evaluate interregional transmission facilities.

77. Moreover, as required by Order No. 1000, the proposal establishes coordinated timelines for joint evaluation and individual consideration by each participating transmission planning region of proposed interregional transmission facilities so that these processes occur in the same general time frame.¹⁷⁰ Specifically, under the proposal, the proponent of an interregional transmission facility must submit the transmission project to the Relevant Planning Regions no later than March 31 of any even numbered calendar year in accordance with the requirements of each Planning Region's regional transmission planning process,¹⁷¹ and the joint evaluation will commence in the calendar year of the interregional transmission facility's submittal or immediately following the calendar year.¹⁷²

78. We reject Public Interest Organizations' request to require a joint interregional study and SDG&E's request to establish interregional study teams. Under Order No. 1000, interregional transmission coordination builds upon the transmission planning processes of each participating region. Order No. 1000 does not require the development of an interregional transmission plan.¹⁷³ The Commission also rejected, in Order No. 1000, that interregional transmission coordination requires the creation of interregional teams to evaluate interregional transmission facilities. The Commission held that transmission planning regions may create a separate process for developing interregional transmission facilities; however, to be eligible for interregional cost allocation, the interregional transmission facility must be selected in the regional transmission plan for purposes of cost allocation in each of the Relevant Planning Regions.¹⁷⁴ Thus, there is no requirement that Western Filing Parties form interregional study teams and thus, such requirement would be beyond the scope of Order No. 1000.

79. We find that Western Filing Parties provide a description of the types of transmission studies that will be conducted to determine whether interregional

¹⁷⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 438.

¹⁷¹ Common Tariff § 4.1. *E.g.*, PacifiCorp OATT, Attachment K, § 4.4.1.

¹⁷² Common Tariff § 4.2. *E.g.*, PacifiCorp OATT, Attachment K, § 4.4.2.

¹⁷³ Order No. 1000-A, 139 FERC ¶ 61,132 at P 511.

¹⁷⁴ *See* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 444; Order No. 1000-A, 139 FERC ¶ 61,132 at P 635.

transmission facilities are more efficient or cost-effective than regional transmission facilities in their respective Commission-approved regional transmission planning processes.¹⁷⁵

80. We reject AWEA's request to direct Western Filing Parties to harmonize study models or to develop a uniform study model to be used in evaluation of interregional transmission facilities. Order No. 1000 has no such requirement. Order No. 1000 requires that each transmission planning region develop procedures to identify and resolve differences in the data, models, assumptions, planning horizons and criteria used to study a proposed interregional transmission project within its regional transmission planning process.¹⁷⁶ Western Filing Parties' proposal requires the Relevant Planning Region to confer with other Relevant Planning Regions regarding the proposed project data, costs, and study assumptions that it will use in its regional transmission planning process to evaluate the interregional transmission facility. The common tariff language also imposes a requirement on the Relevant Planning Region to seek to resolve any differences that it has with other Relevant Planning Regions regarding the transmission project if such differences may affect its evaluation.¹⁷⁷

81. We find that by imposing these two requirements on the transmission planning region, Western Filing Parties have complied with the requirements of Order No. 1000 to develop procedures for the identification and resolution of differences in the data, models, assumptions, transmission planning horizons, and criteria used to study a proposed interregional transmission project. Thus, we also dismiss Public Interest Organizations' argument that the proposal falls short of that requirement. In Order No. 1000, the Commission did not prescribe the specific procedures or the level of detail for the procedure pursuant to which transmission planning data and information must be exchanged. Because of the differences in each region's regional planning procedures, including timing, Western Filing Parties' proposal to require efforts to reconcile

¹⁷⁵ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.4.1 (Conducting Technical Studies) (2.0.0); *e.g.* Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Process Planning) (8.0.0), Part IV, § 6.2.1 (Analytical Tools); *e.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 2.7 (Economic Congestion Studies); *e.g.*, APS, FERC Electric Tariff, Volume No. 2 (OATT), Table of Contents, Attachment E, Section 2 (APS Transmission Planning) (1.0.0), § .A.3 (Types of Planning Studies).

¹⁷⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437.

¹⁷⁷ Common Tariff § 4.2. *See, e.g.*, PacifiCorp OATT, Attachment K, § 4.4.2.

differences and to allow the relevant regions to work out the mechanisms for doing so on an individualized basis complies with the requirements of Order No. 1000.

82. Further, we reject Public Interest Organizations' challenge to the proposed tariff provision that would allow a transmission planning region to withdraw from joint evaluation if it determines that the proposed interregional transmission facility will not meet any of its transmission planning needs. The Commission has stated that the decision whether to select an interregional transmission facility in a regional transmission plan for the purposes of cost allocation is a decision to be made by each region through its regional transmission planning process.¹⁷⁸ Order No. 1000 requires that an interregional body must be created to validate regional transmission determinations.¹⁷⁹ We note, however, that stakeholders will have ample opportunity to challenge the transmission planning region's determinations regarding a proposed interregional transmission facility within the respective region's regional transmission planning process.

83. We find that, with the one exception, the implementation and timing provisions housed in the additional tariff revisions of CAISO and ColumbiaGrid Applicants to be just and reasonable and consistent with Order No. 1000. The new tariff language is consistent with the common language and provides added clarity on how CAISO and ColumbiaGrid transmission planning regions will implement the interregional transmission coordination procedures. However, as discussed in the Cost Allocation section below, we do not accept CAISO's provision in section 24.17.2 to develop an initial estimate of the benefits of an interregional transmission facility in terms of the estimated avoided costs of the regional transmission solution for which it eliminates or defers the regional transmission need.

84. In response to AWEA's concern that it is unreasonable, under ColumbiaGrid Applicants' proposal, for an entity that submits an interregional transmission project to assume primary responsibility for performing the needed analytical work in the study team, we note that while the proponent may have primary responsibility, the affected transmission owner or operator (whose transmission need is met by the proposed interregional transmission facility) will play a substantial role in performing the analysis. Accordingly, we find that AWEA's concern is misplaced. We will not require CAISO or other Western Filing Parties to include additional implementation details such as project financing, ownership and construction, operational control, or scheduling rights, in the

¹⁷⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 401 & 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 635.

¹⁷⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 511.

proposed tariffs as requested by SDG&E and SoCal Edison, because the level of detail requested goes beyond what is required by the interregional transmission coordination and cost allocation requirements of Order No. 1000.¹⁸⁰ While Order No. 1000 requires the development of a formal procedure to identify and jointly evaluate interregional transmission facilities and to have a common method for allocating the costs of those transmission facilities, Order No. 1000 does not require that interregional coordination and cost allocation procedures include implementation details such as project financing, ownership and construction, operational control, or scheduling rights. We do not agree with SDG&E's comments that the proposed tariff language will result in open questions concerning the costs of interregional transmission facilities. As discussed above, we find that Western Filing Parties' proposal adequately requires the Relevant Planning Regions to confer about projected interregional transmission facility costs and to resolve any differences that may arise, and, thus, generates adequate certainty about interregional transmission facilities. Accordingly, we will not direct Western Filing Parties to include additional implementation details in the proposed tariffs.

85. Finally, we disagree with SoCal Edison that the Commission should require a strict timeline to complete negotiations of an interregional transmission facility selected for purposes of cost allocation. Order No. 1000 did not specify any fixed timeline by which negotiations would need to be completed. However, an interregional transmission project will be subject to the reevaluation procedures included in the regional transmission planning processes. Specifically, as required by Order No. 1000, each public utility transmission providers' tariff must describe the circumstances and procedures under which the public utility transmission providers in the regional transmission planning process will reevaluate the regional transmission plan to determine if delays in the development of a transmission facility selected in its regional transmission plan for purposes of cost allocation require evaluation of transmission solutions.¹⁸¹

iii. Transparency and Stakeholder Participation

86. The Commission required public utility transmission providers, either individually or through their transmission planning region, to maintain a website or e-mail list for the communication of information related to interregional transmission coordination procedures.¹⁸² While public utility transmission providers may maintain such

¹⁸⁰ SDG&E and SoCal Edison's comments reference § 24.17.3 of CAISO's OATT, but we address it here as it applies to all Western Filing Parties.

¹⁸¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 263 & 329.

¹⁸² *Id.* P 458.

information on an existing public utility transmission provider's website or a regional transmission planning website, the information must be posted in a way that enables stakeholders to distinguish between information related to interregional transmission coordination and information related to regional transmission planning.¹⁸³

87. In order to facilitate stakeholder involvement, the Commission required public utility transmission providers, "subject to appropriate confidentiality protections and [Critical Energy Infrastructure Information (CEII)] requirements," to "make transparent the analyses undertaken and determinations reached by neighboring transmission planning regions in the identification and evaluation of interregional transmission facilities."¹⁸⁴ The Commission also required that each public utility transmission provider describe in its OATT how the regional transmission planning process will enable stakeholders to provide meaningful and timely input with respect to the consideration of interregional transmission facilities.¹⁸⁵

(a) Compliance Filings

88. Under the proposed common tariff language, each transmission planning region will post its Annual Interregional Information on its website in accordance with its regional transmission planning process.¹⁸⁶ Such Annual Interregional Information will include the transmission planning region's study plan and underlying information to the study plan (including identification of base cases, planning study assumptions, and study methodologies), initial study reports, and the regional transmission plan.¹⁸⁷ Each transmission planning region may use the Annual Interregional Information of other transmission planning regions in its regional transmission planning process.¹⁸⁸ The Annual Interregional Information made available or otherwise provided by a transmission planning region is subject to applicable confidentiality and CEII restrictions and other

¹⁸³ *Id.* P 458.

¹⁸⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at P 520 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 465 n.365).

¹⁸⁵ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

¹⁸⁶ Common Tariff § 2. *E.g.*, PacifiCorp OATT, Attachment K § 4.2.

¹⁸⁷ *Id.*

¹⁸⁸ *Id.*

applicable laws, under that transmission planning region's regional transmission planning process.¹⁸⁹

89. Western Filing Parties propose that each transmission planning region will also participate in the Annual Interregional Coordination Meeting, which will be open to stakeholders. Notice of the meeting to stakeholders will be made in accordance with each transmission planning region's regional transmission planning process. They also propose that each transmission planning region will host the Annual Interregional Coordination Meeting in turn with the other transmission planning regions and is to seek to convene such meeting in February, but not later than March 31. Under the proposal, topics discussed at the Annual Interregional Coordination Meeting may include (1) each transmission planning region's most recent Annual Interregional Information (to the extent it is not confidential or protected by CEII or other legal restrictions); (2) identification and preliminary discussion of interregional solutions, including conceptual solutions, that may meet regional transmission needs in each of two or more transmission planning regions more cost-effectively or efficiently; and (3) updates of the status of interregional transmission projects being evaluated or previously included in the transmission planning region's regional transmission plan.¹⁹⁰

90. Western Filing Parties propose that, as part of the joint evaluation of an interregional transmission project that has been submitted into the regional transmission planning process of each Relevant Planning Region and the interregional cost allocation process, the Relevant Planning Regions will provide an opportunity to stakeholders to participate in its activities in accordance with its regional transmission planning process.¹⁹¹

(b) Protests/Comments

91. Public Interest Organizations state that Order No. 1000 requires public utility transmission providers to make transparent the determinations reached by neighboring transmission planning regions in the identification and evaluation of interregional transmission facilities.¹⁹² Public Interest Organizations maintain that the proposal does

¹⁸⁹ *Id.*

¹⁹⁰ Common Tariff § 3. *E.g.*, PacifiCorp OATT, Attachment K § 4.3.

¹⁹¹ *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), §§ 4.2 (b) (Joint Evaluation of an ITP) & 4.5.2(b) (Interregional Cost Allocation Process).

¹⁹² Public Interest Organizations Western Protest at 16.

not contain any reference to making the decisions transparent.¹⁹³ Public Interest Organizations request that the Commission require the proposal to include language that the Relevant Planning Regions must post on their website their determinations and underlying rationale related to the identification and evaluation of potential interregional facilities, including those that a region finds do not meet any of its transmission needs and do not get selected for regional cost allocation.¹⁹⁴

92. SDG&E also requests that the Commission direct CAISO and the other western region participants to review the effectiveness of interregional transmission planning and interregional cost allocation procedures and determine whether changes are in order.¹⁹⁵ SDG&E argues that if the adopted procedures fail to demonstrate that they have improved the likelihood that efficient and cost-effective interregional transmission projects will be built, it should be taken as a clear sign of failure and the need for such changes.¹⁹⁶

(c) Answers

93. Western Answering Parties do not agree with Public Interest Organizations' contention that the proposal fails to satisfy the transparency requirements of Order No. 1000 or with the request to direct Western Filing Parties to post on their websites the determinations and underlying rationale related to the identification and evaluation of potential interregional facilities.¹⁹⁷ Western Answering Parties assert that each Relevant Planning Region must make its determinations through its regional transmission planning process, which itself is subject to the transparency requirements of Order No. 1000 and Commission approval.¹⁹⁸ According to Western Answering Parties, this will ensure transparency in a manner found compliant with Order No. 1000.¹⁹⁹

¹⁹³ *Id.*

¹⁹⁴ *Id.*

¹⁹⁵ SDG&E Protest at 9.

¹⁹⁶ *Id.*

¹⁹⁷ Western Answering Parties Second Answer at 11.

¹⁹⁸ *Id.* at 11.

¹⁹⁹ *Id.*

94. With respect to SDG&E's request that the Commission direct Western Filing Parties to review the effectiveness of the interregional transmission planning and cost allocation procedures to determine whether changes are needed, Western Answering Parties assert that there is no need for such a requirement.²⁰⁰ Western Answering Parties note that they consistently evaluate their respective regional planning processes and will also do so as part of the coordinated interregional planning embodied in the common tariff language. They also argue that SDG&E's request is not required by Order No. 1000.²⁰¹

(d) Commission Determination

95. We find that the common tariff language proposed by Western Filing Parties complies with the requirements of Order No. 1000 to maintain a website for the communication of information related to interregional transmission coordination procedures; make transparent the analyses undertaken and determinations reached in the identification and evaluation of interregional transmission facilities; and to describe how stakeholders will be able to provide meaningful and timely input to the consideration of interregional transmission facilities. Likewise, we find that Bonneville Power's proposed OATT revisions to implement the coordination requirements of common tariff language sections 4.2, 4.3, and 4.5.2 substantially conform or are superior to the *pro forma* OATT, as modified by Order No. 1000.

96. We find that in proposing to post its Annual Interregional Information on each transmission planning region's website, which will include information underlying a transmission planning region's study plans, initial study reports, and the regional transmission plan, in the transmission planning region's evaluation of an interregional transmission facility,²⁰² Western Filing Parties comply with the requirements to maintain a website and make transparent the analyses undertaken and determinations reached by neighboring transmission planning regions in the identification and evaluation of interregional transmission facilities. We disagree with Public Interest Organizations' assertion that Western Filing Parties' proposal does not provide the required transparency with regard to the determinations reached by the planning regions in the identification and evaluation of interregional transmission facilities. As Western Filing Parties note, each Relevant Planning Region will make its determinations through its regional transmission planning process, which itself is subject to the transparency requirements of

²⁰⁰ *Id.* at 15.

²⁰¹ *Id.*

²⁰² Common Tariff § 2. *E.g.*, PacifiCorp OATT, Attachment K § 4.2.

Order No. 1000 and Commission approval. Therefore, the determinations reached by relevant planning regions in the identification and evaluation of interregional transmission facilities will meet the same transparency requirements as the regional transmission planning process, including the requirement that the evaluation process culminate in a determination that is sufficiently detailed to understand why a particular transmission facility was selected or not selected in the regional transmission plan for purposes of cost allocation.²⁰³

97. We also find that by allowing stakeholder participation through the Annual Interregional Coordination Meeting²⁰⁴ and providing that each Relevant Planning Region will provide an opportunity for stakeholders to participate in evaluating a proposed interregional transmission facility in its regional transmission planning process,²⁰⁵ Western Filing Parties describe how stakeholders will be able to provide meaningful and timely input to the consideration of interregional transmission facilities.

98. We disagree with SDG&E that the Commission should require Western Filing Parties to review the effectiveness of interregional transmission planning and interregional cost allocation procedures and determine whether changes are in order. Such a procedure was not required by Order No. 1000. Further, as Western Filing Parties note, each enrolled transmission provider consistently evaluates their respective regional planning processes and will also do so as part of the coordinated interregional planning embodied in the common tariff language.

2. Cost Allocation

99. In Order No. 1000, the Commission required each public utility transmission provider in a transmission planning region to have, together with the public utility transmission providers in its own transmission planning region and a neighboring transmission planning region in its interconnection, a common method or methods for allocating the costs of a new interregional transmission facility among the beneficiaries of that transmission facility in the two neighboring transmission planning regions in which the transmission facility is located.²⁰⁶ The Commission found that the method or

²⁰³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 328.

²⁰⁴ Common Tariff § 3. *E.g.*, PacifiCorp OATT, Attachment K § 4.3.

²⁰⁵ Common Tariff § 4.2(b). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2.

²⁰⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 626, 634.

methods for interregional transmission cost allocation used by two transmission planning regions may be different from the method or methods used by either of them for regional transmission cost allocation.²⁰⁷ The Commission added that the method or methods for allocating a region's share of the cost of an interregional transmission facility may differ from the method or methods for allocating the cost of a regional facility within that region.²⁰⁸ The Commission clarified that it would not require each transmission planning region to have the same interregional cost allocation method or methods with each of its neighbors, but rather that each pair of transmission planning regions could develop its own approach to interregional cost allocation that satisfied both transmission planning regions' transmission needs and concerns, as long as that approach satisfied the interregional cost allocation principles.²⁰⁹ The Commission required that, for an interregional transmission facility to be eligible to receive interregional cost allocation, each of the neighboring transmission planning regions in which the interregional transmission facility is proposed to be located must select the facility in its regional transmission plan for purposes of cost allocation.²¹⁰ The Commission clarified that, if one of the regional transmission planning processes does not select the interregional transmission facility to receive interregional cost allocation, neither the transmission developer nor the other transmission planning region may allocate the costs of that interregional transmission facility under the provisions of Order No. 1000 to the region that did not select the interregional transmission facility.²¹¹

100. The Commission required each public utility transmission provider to show on compliance that its cost allocation method or methods for interregional cost allocation are just and reasonable and not unduly discriminatory or preferential by demonstrating that each method satisfies the six interregional cost allocation principles described in Order No. 1000.²¹² The Commission took a principles-based approach because it recognized

²⁰⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²⁰⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²⁰⁹ *Id.* P 627 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 580).

²¹⁰ *Id.* PP 628, 635 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

²¹¹ *Id.* P 635.

²¹² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603; Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

that regional differences may warrant distinctions in cost allocation methods among transmission planning regions.²¹³ The Commission recognized that a variety of methods for cost allocation, including postage stamp cost allocation, may satisfy the set of general principles.²¹⁴ The Commission stated that the cost allocation principles do not apply to other new, non-Order No. 1000 transmission facilities and therefore did not foreclose the opportunity for a developer or individual customer to voluntarily assume the costs of a new transmission facility.²¹⁵ The Commission also explained that Order No. 1000 permits participant funding but not as an interregional cost allocation method.²¹⁶

101. The Commission stated that, in an RTO or ISO transmission planning region, the cost allocation method or methods must be filed in the RTO or ISO OATT; while, in a non-RTO/ISO transmission planning region, the method or methods must be filed in the OATT of each public utility transmission provider in the transmission planning region.²¹⁷ The Commission stated that, in either instance, such cost allocation method or methods must be consistent with the interregional cost allocation principles in Order No. 1000.²¹⁸ The Commission noted that, if public utility transmission providers in a region or pair of regions could not agree, the Commission would use the record in the relevant compliance filing proceeding(s) as a basis to develop a cost allocation method or methods that meets the Commission's requirements.²¹⁹

²¹³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 604; Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

²¹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 605; Order No. 1000-A, 139 FERC ¶ 61,132 at P 683.

²¹⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603; Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

²¹⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 723-729; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 718, 726-737.

²¹⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²¹⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²¹⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 607; Order No. 1000-B, 141 FERC ¶ 61,044 at P 66.

102. Interregional Cost Allocation Principle 1 specifies that the costs of a new interregional transmission facility must be allocated to each transmission planning region in which that transmission facility is located in a manner that is at least roughly commensurate with the estimated benefits of that transmission facility in each of the transmission planning regions. In determining the beneficiaries of interregional transmission facilities, transmission planning regions may consider benefits including, but not limited to, those associated with maintaining reliability and sharing reserves, production cost savings and congestion relief, and/or meeting Public Policy Requirements.²²⁰ Interregional Cost Allocation Principle 1 precludes an allocation where the benefits received are trivial in relation to the costs to be borne.²²¹

103. Order No. 1000 does not prescribe a particular definition of “benefits” or “beneficiaries.”²²² The Commission stated in Order No. 1000-A that, “while Order No. 1000 does not define benefits and beneficiaries, it does require the public utility transmission providers in each transmission planning region to be definite about benefits and beneficiaries for purposes of their cost allocation methods.”²²³ In addition, for a cost allocation method or methods to be accepted by the Commission as Order No. 1000-compliant, the method will have to specify clearly and definitively the benefits and the class of beneficiaries.²²⁴ A benefit used by public utility transmission providers in an interregional cost allocation method or methods must be an identifiable benefit, and the transmission facility cost allocated must be roughly commensurate with that benefit.²²⁵

²²⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 622; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 654, 681-682, 691. Order No. 1000 defined Public Policy Requirements as requirements established by local, state or federal laws or regulations (i.e., enacted statutes passed by the legislature and signed by the executive and regulations promulgated by a relevant jurisdiction, whether within a state or at the federal level). Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 2. Order No. 1000-A clarified that Public Policy Requirements included local laws and regulations passed by a local governmental entity, such as a municipal or county government. Order No. 1000-A, 139 FERC ¶ 61,132 at P 319.

²²¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 639.

²²² *Id.* P 624; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 655, 674, 676-679.

²²³ *Id.* P 679.

²²⁴ *Id.* P 678.

²²⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 625.

The Commission stated that, once beneficiaries are identified, public utility transmission providers would then be able to identify what is the more efficient or cost-effective transmission solution or assess whether costs are being allocated at least roughly commensurate with benefits.²²⁶ Each regional transmission planning process must provide entities who will receive interregional cost allocation an understanding of the identified benefits on which the cost allocation is based.²²⁷ Order No. 1000-A stated that public utility transmission providers in each transmission planning region, in consultation with their stakeholders, may consider proposals to allocate costs directly to generators as beneficiaries that could be subject to interregional cost allocation, but any such allocation must not be inconsistent with the generator interconnection process under Order No. 2003.²²⁸

104. Interregional Cost Allocation Principle 2 specifies that a transmission planning region that receives no benefit from an interregional transmission facility that is located in that region, either at present or in a likely future scenario, must not be involuntarily allocated any of the costs of that transmission facility.²²⁹ All cost allocation methods must provide for allocation of the entire prudently incurred cost of a transmission project to prevent stranded costs.²³⁰ To the extent that public utility transmission providers propose a cost allocation method or methods that consider the benefits and costs of a group of new transmission facilities and adequately support their proposal, Interregional Cost Allocation Principle 2 would not require a showing that every individual transmission facility in the group of transmission facilities provides benefits to every beneficiary allocated a share of costs of that group of transmission facilities.²³¹

²²⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

²²⁷ *Id.* P 746 (noting that it would occur prior to the recovery of such costs through a formula rate).

²²⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 760; Order No. 1000-A, 139 FERC ¶ 61,132 at P 680.

²²⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 637; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 684, 689, 691.

²³⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 640; Order No. 1000-A, 139 FERC ¶ 61,132 at P 685; Order No. 1000-B, 141 FERC ¶ 61,044 at P 68.

²³¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 641.

105. The Commission clarified in Order No. 1000-A that public utility transmission providers may rely on scenario analyses in the preparation of a regional transmission plan and the selection of new transmission facilities for cost allocation.²³² Interregional Cost Allocation Principle 2 would be satisfied if a project or group of projects is shown to have benefits in one or more of the transmission planning scenarios identified by public utility transmission providers in their Commission-approved Order No. 1000-compliant cost allocation methods.²³³ The Commission clarified in Order No. 1000-B that, when it made this finding, it did not intend to remove the “likely future scenarios” concept from transmission planning and that likely future scenarios can be an important factor in public utility transmission providers’ consideration of transmission projects and in the identification of beneficiaries consistent with the cost causation principle.²³⁴

106. Interregional Cost Allocation Principle 3 specifies that, if a benefit to cost threshold ratio is used to determine whether an interregional transmission facility has sufficient net benefits to qualify for interregional cost allocation, the ratio must not be so large as to exclude a transmission facility with significant positive net benefits from cost allocation.²³⁵ Public utility transmission providers located in the neighboring transmission planning regions may choose to use such a threshold to account for uncertainty in the calculation of benefits and costs.²³⁶ If adopted, such a threshold may not include a ratio of benefits to costs that exceeds 1.25 unless the pair of regions justify and the Commission approves a higher ratio.²³⁷

107. The Commission stated that Interregional Cost Allocation Principle 3 did not require the use of a benefit to cost ratio threshold.²³⁸ The Commission did not specify

²³² Order No. 1000-A, 139 FERC ¶ 61,132 at P 690; Order No. 1000-B, 141 FERC ¶ 61,044 at P 70.

²³³ Order No. 1000-A, 139 FERC ¶ 61,132 at P 690; Order No. 1000-B, 141 FERC ¶ 61,044 at P 70.

²³⁴ *Id.* P 72.

²³⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 646; Order No. 1000-A, 139 FERC ¶ 61,132 at P 692.

²³⁶ *Id.*

²³⁷ *Id.*

²³⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 647; Order No. 1000-A, 139 FERC ¶ 61,132 at 693.

whether or how an interregional benefit-cost threshold should be applied when selecting a project in the regional transmission plan for purposes of cost allocation or which costs should be included when calculating a benefit-cost threshold to use in this selection process.²³⁹ However, if a transmission planning region chooses to have such a threshold, Interregional Cost Allocation Principle 3 limited the threshold to one that is not so high as to block inclusion of many worthwhile transmission projects in the regional transmission plan.²⁴⁰ The Commission allowed public utility transmission providers in a transmission planning region to use a lower ratio without a separate showing and to use a higher threshold if they justify it and the Commission approves a greater ratio.²⁴¹ The Commission stated that, if the issue of whether any benefit to cost ratio threshold for an interregional transmission facility may supersede the ratio for a transmission planning region's regional transmission cost allocation should be presented on compliance, the Commission would address it then based on the specific facts in that filing.²⁴²

108. Interregional Cost Allocation Principle 4 specifies that costs allocated for an interregional transmission facility must assign costs only to the transmission planning regions in which the interregional transmission facility is located.²⁴³ Costs cannot be assigned involuntarily to a transmission planning region in which that interregional transmission facility is not located.²⁴⁴ However, interregional transmission coordination must identify consequences for other transmission planning regions, such as upgrades that may be required in a third transmission planning region and, if the transmission providers in the regions in which the interregional transmission facility is located agree to bear costs associated with such upgrades, then the interregional cost allocation method must include provisions for allocating the costs of such upgrades among the beneficiaries in the transmission planning regions in which the interregional transmission facility is located.²⁴⁵ The Commission noted that, given the option for a transmission planning

²³⁹ Order No. 1000-B, 141 FERC ¶ 61,044 at P 64.

²⁴⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 647; Order No. 1000-A, 139 FERC ¶ 61,132 at 693.

²⁴¹ *Id.*

²⁴² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 650.

²⁴³ *Id.* P 657; Order No. 1000-A, 139 FERC ¶ 61,132 at P 696.

²⁴⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 657; Order No. 1000-A, 139 FERC ¶ 61,132 at P 696.

region in which an interregional transmission facility is not located to voluntarily be assigned costs, regions are free to negotiate interregional transmission arrangements that allow for the allocation of costs to beneficiaries that are not located in the same transmission planning region as any given interregional transmission facility.²⁴⁶

109. Interregional Cost Allocation Principle 5 specifies that the cost allocation method and data requirements for determining benefits and identifying beneficiaries for an interregional transmission facility must be transparent with adequate documentation to allow a stakeholder to determine how they were applied to a proposed interregional transmission facility.²⁴⁷

110. Interregional Cost Allocation Principle 6 specifies that the public utility transmission providers located in neighboring transmission planning regions may choose to use a different cost allocation method for different types of interregional transmission facilities, such as interregional transmission facilities needed for reliability, congestion relief, or to achieve Public Policy Requirements.²⁴⁸ Each cost allocation method must be set out clearly and explained in detail in the compliance filing.²⁴⁹ If public utility transmission providers choose to have a different cost allocation method for each type of transmission facility, there can be only one cost allocation method for each type.²⁵⁰

a. Compliance Filings

111. As explained in detail below, under their proposed interregional cost allocation method, Western Filing Parties propose to allocate the costs of an interregional transmission project to the Relevant Planning Regions that select the interregional transmission project in their respective regional transmission plans for purposes of cost

²⁴⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 657; Order No. 1000-A, 139 FERC ¶ 61,132 at P 696.

²⁴⁶ *Id.* P 629 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582).

²⁴⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 668.

²⁴⁸ *Id.* P 685.

²⁴⁹ *Id.* P 685.

²⁵⁰ *Id.* P 686; Order No. 1000-A, 139 FERC ¶ 61,132 at P 628. *See also* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 581.

allocation.²⁵¹ Each Relevant Planning Region then allocates its share of the costs of the interregional transmission project to beneficiaries in accordance with its transmission planning region's regional cost allocation method.²⁵² As stated above, the Western Filing Parties have developed common tariff language addressing the interregional transmission coordination and cost allocation requirements of Order No. 1000.²⁵³

112. Under Western Filing Parties' proposed interregional cost allocation method, a proponent of an interregional transmission project may request interregional cost allocation by submitting the interregional transmission project in each Relevant Planning Region's regional transmission planning process and requesting cost allocation in accordance with the Relevant Planning Region's regional transmission planning process.²⁵⁴ The Relevant Planning Regions must then confer about the inputs and assumptions that will be used in each regional transmission planning process to evaluate the proposed interregional transmission project.²⁵⁵ Specifically, the Relevant Planning Regions will confer about (1) the assumptions and inputs to be used by each Relevant Planning Region for purposes of determining benefits in accordance with its regional cost allocation method, as applied to interregional transmission projects; (2) each Relevant Planning Region's regional benefits stated in dollars resulting from the interregional transmission project; and (3) assignment of the projected costs of the interregional transmission project to each Relevant Planning Region.²⁵⁶ Each Relevant Planning

²⁵¹ Common Tariff § 6.1 (Selection by All Relevant Planning Regions). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process, § 4.6.1 (Selection by All Relevant Planning Regions).

²⁵² Common Tariff § 6.1. *E.g.*, PacifiCorp OATT, Attachment K § 4.5.2(d).

²⁵³ *E.g.*, PacifiCorp Transmittal Letter at 2-3.

²⁵⁴ Common Tariff § 5.1 (Submission Requirements). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.5.1 (Submission Requirements).

²⁵⁵ Common Tariff § 5.2 (Interregional Cost Allocation Process). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.5.2 (Interregional Cost Allocation Process).

²⁵⁶ *Id.*

Region must seek to resolve any differences relating to interregional transmission project data or other information if such differences may affect their evaluation.²⁵⁷

113. The proposal also provides that each Relevant Planning Region will apply its respective regional cost allocation method(s) to interregional transmission projects to determine the regional benefits received, stated in dollars, from the interregional transmission project.²⁵⁸ These regional cost allocation methods vary. The ColumbiaGrid transmission planning region calculates regional benefits by using power flow and stability studies to project avoided costs created by the elimination or deferral of planned transmission facility additions and/or projected changes in transfer capability. ColumbiaGrid also uses production cost studies to project the estimated usage of any such changes in transfer capability.²⁵⁹

114. The WestConnect transmission planning region determines regional benefits according to the type of project. For reliability benefits, WestConnect uses an avoided cost approach. For economic projects, WestConnect uses a benefit/cost ratio of 1.25. The benefit/cost ratio is determined by calculating the aggregate load-weighted benefit-production cost savings and the reduction in reserve sharing requirements as economic benefits capable of contributing to the determination that a project is economically justified for cost allocation. For the benefits associated with projects that satisfy public policy requirements, WestConnect identifies the proportion of the number of megawatts of public policy resources enabled by the public policy transmission project for a given beneficiary to the total number of megawatts of public policy resources enabled by the transmission project and multiplies the resulting proportion by the total cost of the public policy transmission project.²⁶⁰

115. The NTTG transmission planning region uses three evaluation criteria to identify regional benefits and evaluate transmission projects proposed for selection in the regional

²⁵⁷ *Id.*

²⁵⁸ *Id.* Western Filing Parties' proposed common tariff language does not explain how each transmission planning region determines benefits and identifies beneficiaries; instead, these determinations are to be made consistent with each transmission planning region's regional transmission planning process.

²⁵⁹ *E.g.*, Avista Corporation. OATT, Attachment K Part IV § 6.2.1.

²⁶⁰ *E.g.*, APS, FERC Electric Tariff, Volume No. 2 (OATT), Table of Contents, Attachment E, § VII B.3 (Interregional Coordination and Cost Allocation) (1.1.0).

transmission plan for purposes of cost allocation (1) change in annual capital-related costs (i.e., avoided costs), (2) change in energy losses; and (3) change in reserves.²⁶¹

116. Unlike these three regions, CAISO's Commission-accepted regional cost allocation method does not include a calculation of estimated benefits. As a result, CAISO proposes new tariff language on this point. The proposed language states that CAISO will develop an initial estimate of the benefits of the interregional transmission project according to the estimated avoided costs of the regional transmission solution for which it eliminates or defers the regional need.²⁶²

117. Each Relevant Planning Region will use the determination of benefits to determine its portion of the projected costs of an interregional transmission project.²⁶³ Specifically, each Relevant Planning Region will calculate its *pro rata* share of the projected costs of the interregional transmission project by multiplying its share of the total benefits identified by all the Relevant Planning Regions, in dollars, by the total costs of the interregional transmission project.²⁶⁴ Each Relevant Planning Region will then use its regional transmission planning process to determine whether to select the interregional transmission project in its regional transmission plan for purposes of cost allocation.²⁶⁵

118. If all the Relevant Planning Regions select the interregional transmission project in their respective regional transmission plans for purposes of interregional cost allocation in accordance with their regional transmission planning processes, then each Relevant Planning Region will apply its regional cost allocation method(s) to allocate the costs of the interregional transmission project.²⁶⁶

²⁶¹ *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), §§ 3.7.4.1 (Analysis and Methodology) & 3.7.4.2 (Analysis Criteria).

²⁶² CAISO Tariff, §§ 24.17.2 and 24.17.3.

²⁶³ Common Tariff § 5.2. *E.g.*, PacifiCorp OATT, Attachment K § 4.5.2.

²⁶⁴ *Id.*

²⁶⁵ Common Tariff, § 5.2(f). *E.g.*, PacifiCorp OATT, Attachment K § 4.5.2(f).

²⁶⁶ Common Tariff § 6.1 (Selection by All Relevant Planning Regions). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.6.1.

119. If all of the Relevant Planning Regions do not select the interregional transmission project in their respective regional transmission planning processes for purposes of interregional cost allocation, each Relevant Planning Region that has selected the interregional transmission project will reevaluate whether, without the participation of the non-selecting Relevant Planning Region(s), the interregional transmission project should be selected in its regional transmission plan for purposes of interregional cost allocation.²⁶⁷ These reevaluations will be repeated as many times as necessary until the number of selecting Relevant Planning Regions does not change.²⁶⁸ Once the number of selecting Relevant Planning Regions is fixed and the interregional transmission project remains selected in at least two Relevant Planning Regions' regional transmission plans for purposes of cost allocation, then the selecting Relevant Planning Regions will apply their regional cost allocation methods to allocate the costs of the interregional transmission project.²⁶⁹

120. Western Filing Parties state that their interregional cost allocation method satisfies each of the Commission's six interregional cost allocation principles. Western Filing Parties state that their interregional cost allocation method complies with Interregional Cost Allocation Principle 1 because it allocates interregional transmission project costs on a *pro rata* basis based on the projected benefits in a Relevant Planning Region, which ensures that costs are allocated in a manner that is roughly commensurate with estimated benefits.²⁷⁰ Western Filing Parties explain that their proposal meets Interregional Cost Allocation Principle 2 because the costs of a proposed interregional transmission project will only be allocated to a transmission planning region if (1) the interregional transmission project directly interconnects with the transmission facilities in the region; (2) the interregional transmission project meets the Relevant Planning Region's regional transmission needs, and (3) the Relevant Planning Region selects the interregional transmission project in accordance with its respective regional transmission planning process.²⁷¹

²⁶⁷ Common Tariff § 6.2 (Selection by at Least Two but Fewer than All Relevant Regions). *E.g.*, PacifiCorp, Transmission OATT and Service Agmts., Tariff, OATT Vol. No. 11, Attachment K, Transmission Planning Process (5.0.0), § 4.6.2 (Selection by at Least Two but Fewer than All Relevant Regions).

²⁶⁸ *Id.*

²⁶⁹ *Id.*

²⁷⁰ *E.g.*, PacifiCorp Transmittal Letter at 23-24.

²⁷¹ *E.g.*, *id.* at 24.

121. Western Filing Parties contend that their proposal complies with Interregional Cost Allocation Principle 3 because it does not use a cost-benefit threshold.²⁷² Western Filing Parties recognize that their interregional cost allocation method relies on the Relevant Planning Regions' respective regional cost allocation methods and that those regional cost allocation methods may include a cost-benefit threshold. However, they argue that such a regional cost allocation method would have been accepted by the Commission with, among other things, a finding that the cost-benefit threshold satisfied Interregional Cost Allocation Principle 3.²⁷³

122. Western Filing Parties state that their proposal complies with Interregional Cost Allocation Principle 4 because costs will only be allocated to Relevant Planning Regions whose transmission facilities are directly interconnected with the interregional transmission project.²⁷⁴ Western Filing Parties claim that, therefore, a transmission planning region can only be allocated costs for an interregional transmission project located within the transmission planning region.²⁷⁵

123. Western Filing Parties contend that their proposal complies with Interregional Cost Allocation Principle 5 because the proponent of an interregional transmission project must submit the interregional transmission project, along with all required data, to the regional transmission planning process of each Relevant Planning Region, which will determine the regional benefits and identify the beneficiaries of the interregional transmission project.²⁷⁶ Western Filing Parties state that stakeholders are afforded opportunities to participate in the regional transmission planning processes. Western Filing Parties assert that these regional processes of stakeholder participation and information dissemination ensure a transparent cost allocation process with sufficient

²⁷² *E.g., id.* at 24-25.

²⁷³ *E.g., id.*

²⁷⁴ As support, Western Filing Parties state that a Relevant Planning Region is defined such that it must directly interconnect with an interregional transmission project. Additionally, an interregional transmission project must be "a proposed new transmission project that would directly interconnect electrically to existing or planned transmission facilities in two or more Planning Regions." *E.g., PacifiCorp Transmittal Letter* at 25.

²⁷⁵ *E.g., id.*

²⁷⁶ *E.g., id.* at 25-26.

documentation regarding the identification of benefits and beneficiaries of proposed interregional transmission projects.²⁷⁷

124. Western Filing Parties also argue that their proposal complies with Interregional Cost Allocation Principle 6. They explain that their proposal adopts one interregional cost allocation method that applies to all interregional transmission projects.²⁷⁸ Western Filing Parties recognize that at the regional level each transmission planning region has its own regional transmission planning process, which may include different cost allocation methods. However, Western Filing Parties contend that the interregional coordination process does not disturb those regional cost allocation methods.²⁷⁹

125. ColumbiaGrid Applicants propose several steps that they will take for each interregional transmission project that has met the common interregional submission requirements for interregional cost allocation when interregional cost allocation for such project has been timely requested pursuant to section 10.1 of Appendix A of the PEFA. ColumbiaGrid Applicants propose that, if and so long as they are a Relevant Planning Region, they will (1) determine the amount, if any, of regional benefits for purposes of interregional cost allocation resulting from such interregional transmission project; (2) notify each of the other Relevant Planning Regions of the amount of regional benefits for purposes of interregional cost allocation resulting from such interregional transmission project; (3) calculate ColumbiaGrid Applicants' assigned *pro rata* share of the projected costs of such interregional transmission project;²⁸⁰ (4) determine what its

²⁷⁷ *E.g., id.*

²⁷⁸ *E.g., id.* at 26.

²⁷⁹ *E.g., id.*

²⁸⁰ ColumbiaGrid proposes that the *pro rata* share be equal to the product of the projected costs of the interregional transmission project multiplied by a fraction. ColumbiaGrid states that (1) the numerator will be the amount of regional benefits for purposes of interregional cost allocation resulting from the interregional transmission project and (2) the denominator will be the sum of the amount of regional benefits for purposes of interregional cost allocation resulting from such interregional transmission project determined by ColumbiaGrid Applicants and the sum of the regional benefits of each other Relevant Planning Region as calculated with respect to the interregional transmission project by the other Relevant Planning Region in accordance with its regional transmission planning process. *E.g., Avista, OATT, Attachment K, Part IV, § 14.4 (Interregional Cost Allocation Process); Fourth Restated PEFA, Appendix A, § 14.4 (Interregional Cost Allocation Process).*

regional cost allocation would be if ColumbiaGrid Applicants were to select the interregional transmission project as an Order No. 1000 transmission project by performing a preliminary determination of the Order No. 1000 cost allocation to all beneficiaries using the method for an interregional transmission project in section 10.3.3 of Appendix A of the PEFA (Order No. 1000 Cost Allocation) consistent with Section 10.3.3 of Attachment K; and (5) if ColumbiaGrid Applicants receive information from one or more other Relevant Planning Regions regarding what such Relevant Planning Region's regional cost allocation would be if they were to select the interregional transmission project in its regional transmission plan for purposes of interregional cost allocation, ColumbiaGrid Applicants may use such information to identify their total share of the projected costs of the interregional transmission project assigned to ColumbiaGrid Applicants in order to determine whether to select the interregional transmission project as an Order No. 1000 transmission project, pursuant to section 14.5 of Appendix A of the PEFA, consistent with section 14.5 of Attachment K.²⁸¹

126. ColumbiaGrid Applicants propose that, for each interregional transmission project that meets the common interregional joint evaluation requirements when interregional cost allocation has been timely requested, ColumbiaGrid Applicants will determine whether to select the interregional transmission project as an Order No. 1000 Project based on its regional transmission planning process and taking into account the total regional costs from interregional cost allocation.²⁸²

127. ColumbiaGrid Applicants propose to share these interregional transmission project determinations with the other Relevant Planning Regions.²⁸³ ColumbiaGrid Applicants state that they may perform these determinations again due to section 13.6.2 of

²⁸¹ *E.g.*, Avista, OATT, Attachment K, Part IV, § 14.4 (Interregional Cost Allocation Process); Fourth Restated PEFA, Appendix A, § 14.4 (Interregional Cost Allocation Process).

²⁸² *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.5 (Determination of Whether to Select the ITP in ColumbiaGrid Regional Transmission Plan for purposes of Interregional Cost Allocation); Fourth Restated PEFA, Appendix A, § 14.5 (Determination of Whether to Select the ITP in ColumbiaGrid Regional Transmission Plan for purposes of Interregional Cost Allocation).

²⁸³ *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.4 (Interregional Cost Allocation Process); Fourth Restated PEFA, Appendix A, § 14.4 (Interregional Cost Allocation Process).

Appendix A of the PEFA (Selection by at Least Two but Fewer than All Relevant Regions), consistent with section 6.2 of the common tariff language.²⁸⁴ ColumbiaGrid Applicants state that they will apply the ColumbiaGrid regional cost allocation method to the projected costs of an interregional transmission facility that ColumbiaGrid selects in its regional transmission plan for purposes of cost allocation, which are assigned to ColumbiaGrid, to allocate these costs to beneficiaries and sponsors of the interregional transmission facility within ColumbiaGrid.²⁸⁵

128. CAISO proposes new tariff language that provides for the designated owner of an interregional transmission project to recover CAISO's share of the assigned cost of the project. CAISO proposes that the designated owner of the interregional transmission project recover CAISO's assigned share of the project costs through its Commission-accepted regional transmission revenue requirement.²⁸⁶

129. In addition, CAISO adds tariff language to clarify that CAISO's regional transmission solutions that might interconnect to a neighboring planning region would be eligible for cost recovery through CAISO's regional cost allocation process and would not be submitted to the other Relevant Planning Regions for cost allocation purposes. Specifically, CAISO proposes three points in the regional process during which parties may suggest interregional solutions that could meet regional needs (1) during the development of the study plan when parties can submit economic planning study requests, (2) in the phase 2 request window as a solution to reliability or other concerns, or (3) in comments on the statewide conceptual plan.²⁸⁷ CAISO explains that these

²⁸⁴ *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.5 (Determination of Whether to Select the ITP in ColumbiaGrid Regional Transmission Plan for purposes of Interregional Cost Allocation); Fourth Restated PEFA, Appendix A, § 14.5 (Determination of Whether to Select the ITP in ColumbiaGrid Regional Transmission Plan for purposes of Interregional Cost Allocation).

²⁸⁵ *E.g.*, Avista, FERC Electric Tariff No. 8 (OATT), Attachment K (Transmission Planning Process) (8.0.0), Part IV, § 14.6 (Implementation of Application of Regional Cost Allocation Methodology to Selected ITP); Fourth Restated PEFA, Appendix A, § 14.6 (Implementation of Application of Regional Cost Allocation Methodology to Selected ITP).

²⁸⁶ California Independent System Operator Corporation, CAISO eTariff (OATT), § 24.17.4 (Interregional Transmission Project Cost Recovery) (1.0.0).

²⁸⁷ CAISO eTariff (OATT), § 24.13 (Interregional Transmission Proposals in the Regional Process) (2.0.0).

proposals will be evaluated in the regional transmission planning process on the basis of the need for the entire facility, including the costs of the entire facility. CAISO states that, if the project is approved through the regional transmission planning process, the project sponsor will be selected through CAISO's competitive solicitation process. CAISO notes that the project sponsor may elect to have the project studied by other Relevant Planning Regions and may seek cost allocation pursuant CAISO's interregional cost allocation process.²⁸⁸ CAISO also proposes language clarifying that, to the extent CAISO concludes that a potential interregional transmission solution could benefit other Relevant Planning Regions, CAISO may identify the potential interregional transmission solution to the Relevant Planning Regions prior to fully assessing and approving a regional transmission solution in CAISO's regional transmission planning process.²⁸⁹

b. Protests/Comments

130. Public Interest Organizations, SDG&E, SoCal Edison and AWEA argue that Western Filing Parties' proposal lacks a common method for interregional cost allocation because no common definition of benefits or beneficiaries is included in the proposal for purposes of interregional coordination.²⁹⁰ Public Interest Organizations add that the failure to agree on a common method for determining each Relevant Planning Region's *pro rata* cost means there is no assurance that the full extent of benefits stemming from a proposed transmission project will be captured in the cost allocation process.²⁹¹ Public Interest Organizations and SDG&E contend that, because each Relevant Planning Region only looks at its specific region and the needs of its region, there is no common effort to identify the full scope of economic, congestion, or public policy drivers or the full scope of benefits that a potential interregional transmission project may offer.²⁹² Public Interest Organizations claim that, without a full accounting of the potential benefits, the situation may be akin to a direct avoided cost approach to cost allocation at the regional level, where there are benefits from the interregional transmission project that will not be recognized in the cost allocation process.²⁹³ Public Interest Organizations and AWEA

²⁸⁸ *Id.*

²⁸⁹ *Id.*

²⁹⁰ Public Interest Organizations Western Protest at 20. SDG&E Protest at 13. SoCal Edison Protest at 3. AWEA ColumbiaGrid Comments at 13.

²⁹¹ Public Interest Organizations Western Protest at 20.

²⁹² SDG&E Protest at 13.

²⁹³ Public Interest Organizations Western Protest at 21.

contend that the proposed cost allocation method violates Order No. 1000's Interregional Cost Allocation Principle 1 because the inconsistent method for identifying benefits fails to ensure that the cost of an interregional transmission project will be allocated among the project's beneficiaries in a manner roughly commensurate with benefits.²⁹⁴

131. SDG&E complains that a proposed interregional transmission project will only be included in CAISO's annual regional transmission plan if CAISO determines that its share of the costs of the proposed project was less than the costs of deferred or eliminated regional upgrades previously approved by CAISO.²⁹⁵ SDG&E contends that it is unclear from the "avoided or deferred costs" method how a proponent of a proposed interregional transmission project would be able to secure an initial toe-hold in the CAISO regional transmission planning process.²⁹⁶ SDG&E argues that the regional projects may only be partially displaced by an interregional project proposal, the benefits of "deferral" can be speculative, the costs of an interregional project that would be allocated would be dependent on the determination of benefits by other regions, and the value of avoided or deferred costs is a narrow definition of the benefits of an interregional transmission project.²⁹⁷

132. SDG&E further contends that CAISO's proposal ignores benefits such as reducing congestion-related costs, enhancing the capacity value of generators, or lowering the cost of complying with California's renewable portfolio standard requirements.²⁹⁸ According to SDG&E, cost-effective opportunities to add interregional transmission will be missed or undervalued.²⁹⁹ SoCal Edison also maintains that, without a uniform method for calculating benefits, the regions may not identify the same benefits from an interregional transmission project for their respective regions. SoCal Edison argues that, if each participating region assesses benefits differently, each region's share of project costs will be determined on a different basis, which is not consistent with Order No. 1000.³⁰⁰

²⁹⁴ *Id.* at 20. AWEA Comments at 12-13.

²⁹⁵ SDG&E Protest at 7-8.

²⁹⁶ *Id.* at 8.

²⁹⁷ *Id.*

²⁹⁸ *Id.*

²⁹⁹ *Id.*

³⁰⁰ SoCal Edison Protest at 7.

133. AWEA and SDG&E assert that Western Filing Parties' cost allocation proposal does not provide sufficient detail to allow stakeholders to understand or replicate how the benefits of an interregional transmission project will be calculated.³⁰¹ SDG&E requests that the Commission direct Western Filing Parties to specify a list of potential benefits that should be considered for any proposed interregional transmission project.³⁰² SDG&E suggests that the interregional study team would select the potential benefits of any specific proposed interregional transmission project that will be assessed in the joint interregional evaluation.³⁰³

134. SDG&E also suggests that the Commission direct the regional transmission planning regions to develop tariff language that commits each transmission planning region to respond to a project proponent's claim that an interregional transmission project offers more reasonably quantifiable benefits than those identified in the regions' evaluations.³⁰⁴ SDG&E states that, pursuant to this obligation, the interregional response would need to explain why the regions do not agree with the transmission project proponent's assessment of benefits.³⁰⁵ Further, SDG&E suggests using a neutral third party, such as the WECC TEPPC, when disputes about benefits arise to perform an independent benefits assessment which the regions would be obligated to publish.³⁰⁶ SDG&E recommends that the four regions adopt CAISO's Transmission Economic Assessment Methodology (TEAM), or a suitable alternative, as the basic framework for evaluating the economic benefits of proposed interregional transmission projects.³⁰⁷ SDG&E notes that the TEAM would need to be augmented with analyses that capture the benefits associated with a proposed transmission project's ability to enhance the capacity value of generating resources and to lower the capital costs of complying with policy objectives.³⁰⁸ SDG&E emphasizes that a common analytical method is an

³⁰¹ AWEA Comments at 13 and SDG&E Protest at 13.

³⁰² SDG&E Protest at 14.

³⁰³ *Id.*

³⁰⁴ *Id.*

³⁰⁵ *Id.*

³⁰⁶ *Id.* at 14-15.

³⁰⁷ *Id.* at 15.

³⁰⁸ *Id.*

important aspect of interregional planning and coordination and asks the Commission to provide greater direction to the regions about the method.³⁰⁹

135. SoCal Edison and Public Interest Organizations are concerned that an interregional cost allocation determination is not binding on the regions, contrary to Order No. 1000.³¹⁰ SoCal Edison states that Order No. 1000 established a requirement that cost allocation determinations for projects selected in the regional transmission plan for purposes of cost allocation be binding upon identified beneficiaries.³¹¹ SoCal Edison asserts that, while this requirement relates to regional projects, costs associated with interregional projects must also adhere to the principle that “costs be roughly commensurate with benefits and cost allocation determinations for selected interregional projects should also be binding upon identified beneficiaries.”³¹² SoCal Edison adds that, if cost allocation determinations are subject to ongoing negotiations and disputes, then the greater degree of uncertainty and risk on interregional projects than regional and local projects would skew the valuation of interregional projects and make them less likely to be built.³¹³ Public Interest Organizations assert that an option to opt out of cost allocation³¹⁴ creates the risk of a “free rider” problem because the other Relevant Planning Regions could determine to go forward with the transmission project despite the recognition that

³⁰⁹ *Id.*

³¹⁰ SoCal Edison Protest at 3.

³¹¹ *Id.* at 4 (citing *Pub. Serv. Co. of Colorado*, 142 ¶ FERC 61,206, at PP 127-128 (2013)).

³¹² *Id.* (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 586-587).

³¹³ *Id.*

³¹⁴ Public Interest Organizations Western Protest at 20 (citing Common Tariff, §§ 5.2(e)-(f)). Under this proposed tariff language, once a Relevant Planning Region has determined its regional benefits resulting from a proposed interregional transmission facility and calculated its *pro rata* share of projected facility costs, the Relevant Planning Regions would share such information to determine each region’s total share of projected facility costs to determine whether the proposed interregional transmission facility is a more efficient or cost-effective solution to a transmission need. Each Relevant Planning Region would then determine whether to select the interregional transmission facility in its regional transmission plan for purposes of cost allocation.

benefits of the project will be realized in the Relevant Planning Region that is opting out of interregional cost allocation.³¹⁵

136. AWEA argues that Western Filing Parties' proposal does not comply with Interregional Cost Allocation Principle 5 because it does not provide sufficient detail to address the Commission's concerns regarding the transparency and replicability of the benefits analysis.³¹⁶ AWEA claims that the proposed independent approach to benefits identification could result in planning regions unilaterally determining that an interregional transmission project does not meet any of its transmission needs or that the interregional transmission project does not provide any benefits to the region.³¹⁷ AWEA contends that, because the method for identifying benefits is unclear and inconsistent, there is no assurance in Western Filing Parties' proposal that costs will be allocated in a manner roughly commensurate with benefits.³¹⁸

137. Public Interest Organizations state that the proposal does not provide a process for participation by transmission developers or other grid project sponsors that want to participate in the interregional coordination process and have their projects included in the regional plan but are not seeking interregional cost allocation.³¹⁹ Public Interest Organizations state that Order No. 1000 concluded that it is necessary for a merchant transmission developer to provide adequate information and data to allow public utility transmission providers in the transmission planning region to assess the potential reliability and operational impacts of the merchant transmission developer's proposed transmission facilities on other systems in the region.³²⁰ Public Interest Organizations argue that the proposal does not contain an explicit process for merchant transmission developers or any other types of transmission providers to provide this information for purposes of participation in the interregional coordination process nor does it contain

³¹⁵ Public Interest Organizations Western Protest at 21.

³¹⁶ AWEA ColumbiaGrid Comments at 13.

³¹⁷ *Id.*

³¹⁸ *Id.*

³¹⁹ Public Interest Organizations Western Protest at 15-16.

³²⁰ *Id.* at 16 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437).

criteria to help guide the regions in determining whether to include transmission projects in the respective regional plans if they do not seek interregional cost allocation.³²¹

138. Public Interest Organizations contend that the common tariff language sections 5.1 and 5.2 of the proposal assume only the situation that a stakeholder brings a proposed project to the Relevant Planning Regions. Public Interest Organizations argue that it is unclear what cost allocation method and process applies when the Relevant Planning Regions propose a new interregional project that has not yet been proposed by stakeholders.³²²

139. According to SoCal Edison, the allocation of costs among regions for an interregional transmission project will require each region to have a mechanism for assessing and collecting costs from other regions.³²³ SoCal Edison explains that CAISO has a Transmission Access Charge that provides cost sharing within CAISO but other regions do not have similar internal cost-sharing mechanisms.³²⁴ SoCal Edison argues that it is unclear how other regions will assess charges and disburse funds associated with an interregional transmission project among the participating regions and that this uncertainty should be resolved upfront.³²⁵

140. Non-Public Utilities comment on the intent of the common tariff language in Western Filing Parties' filing that applies to transmission facilities jointly owned by public utilities and non-public utilities.³²⁶ Specifically, Non-Public Utilities state that, under the proposed project submission requirements,³²⁷ the proponent of the interregional transmission project decides whether to submit its project for consideration in the regional transmission planning processes of each Relevant Planning Region in order to qualify for cost allocation in those transmission planning regions. For example, although one co-owner that is a member in CAISO could be required to follow CAISO's regional

³²¹ *Id.*

³²² *Id.* at 22.

³²³ SoCal Edison Protest at 5.

³²⁴ *Id.*

³²⁵ *Id.*

³²⁶ Non-Public Utilities Comments at 10.

³²⁷ Common Tariff, § 5.1. *E.g.*, PacifiCorp OATT, Attachment K § 4.5.1.

transmission planning process for purposes of allocating costs for that member's share of the expansion to load in the CAISO region, it does not follow that another co-owner, with load in the WestConnect region, must also follow CAISO's regional transmission planning process for purposes of cost allocation if that co-owner is not seeking to allocate its share of the costs in the CAISO region.³²⁸ Non-Public Utilities argue that a co-owner sharing information on its transmission expansion plan to assist with the preparation of a neighboring region's transmission plan does not equate to a co-owner seeking cost allocation in that region.³²⁹

c. Answers

141. Western Answering Parties³³⁰ state that their proposal does not lack a common interregional cost allocation method.³³¹ Western Answering Parties argue that their proposal sets forth a universally-applied *pro rata* cost allocation method for the allocation – among regions – of interregional transmission project costs.³³² Western Answering Parties explain that, for interregional transmission projects selected in the regional plans of two or more regions, the common tariff language dictates how, through use of a simple *pro rata* method, the multiple regions will allocate the cost of the selected project among the regions.³³³

142. Western Answering Parties disagree with Public Interest Organizations' assertion that the interregional cost allocation method should propose a new definition of benefits or beneficiaries. Western Answering Parties clarify that the proposed interregional cost allocation method intentionally does not seek to impose a new definition of benefits or beneficiaries on an interregional transmission project because beneficiaries are identified exclusively on the regional level through regional transmission planning. Western

³²⁸ Non-Public Utilities Comments at 11.

³²⁹ *Id.* at 12.

³³⁰ Western Answering Parties include all Western Filing Parties except ColumbiaGrid.

³³¹ Western Answering Parties Second Answer at 16.

³³² *Id.*

³³³ *Id.*

Answering Parties add that interregional and interconnection-wide planning are not required under Order No. 1000.³³⁴

143. Western Answering Parties argue that SDG&E's and SoCal Edison's comments about the calculation of benefits and cost allocation fail to consider the purpose of interregional coordination in Order No. 1000.³³⁵ Western Answering Parties argue that Order No. 1000 does not impose a second level interregional transmission planning process on top of the regional transmission planning process and a duplicative assessment of needs and benefits would be an inefficient use of resources.³³⁶ Western Answering Parties contend that the purpose of the Order No. 1000 interregional coordination reforms is to "determine whether an interregional project might displace one or more projects included in regional or local transmission plans."³³⁷ Western Answering Parties thus argue that the cost of the displaced transmission projects represents a reasonable measure of the benefits of the interregional transmission project for cost allocation purposes.³³⁸

144. Western Answering Parties further argue that, contrary to SoCal Edison's assertion, Order No. 1000 does not require that each region determine its regional benefits according to the same method.³³⁹ Western Answering Parties contend that Order No. 1000 requires "a uniform methodology for allocating costs *among* regions, not for determining benefits within a region, with regard to interregional transmission facilities."³⁴⁰ Western Answering Parties also claim that SoCal Edison's approach would require a region to determine the benefits of an interregional transmission project differently than its determination of benefits from a regional project. Western Answering Parties believe that this approach would make it impossible to determine whether the

³³⁴ *Id.* at 13-14.

³³⁵ Western Answering Parties First Answer at 8-9.

³³⁶ *Id.* at 9-10.

³³⁷ *Id.*

³³⁸ *Id.* at 10.

³³⁹ *Id.*

³⁴⁰ *Id.* at 10-11.

interregional transmission project is a more efficient or cost-effective solution in each region's regional transmission planning process.³⁴¹

145. Western Answering Parties assert that their proposed interregional process does not ignore the benefits claimed by SDG&E.³⁴² Western Answering Parties state that their proposed process simply evaluates whether the Relevant Planning Regions can achieve the benefits at a lesser cost.³⁴³ In support, Western Answering Parties state that Order No. 1000 specifically did not require that the interregional process identify conceptual or contingent elements, consider transmission needs driven by public policy requirements, or evaluate economic considerations, with regard to interregional transmission facilities.³⁴⁴

146. In addition, Western Answering Parties argue that SDG&E's concerns regarding the ability of regions to resist cost allocation by refusing to recognize the full range of benefits that might be provided by an interregional transmission project is contrary to the explicit provisions of Order No. 1000.³⁴⁵ Western Answering Parties note that Order No. 1000 made clear that the decision whether to include an interregional transmission project in a regional plan for the purposes of cost allocation is a decision to be made by each region through its regional transmission planning process.³⁴⁶

147. Western Answering Parties also disagree with SDG&E's suggestion that they adopt tariff language to respond to a project proponent's claim that an interregional transmission project offered more reasonably quantifiable benefits than identified in the regions' evaluations.³⁴⁷ Western Answering Parties argue that SDG&E's suggestion would serve no purpose because the ultimate decision to include the project in a regional plan is made under each region's transmission planning process.³⁴⁸ Western Answering

³⁴¹ *Id.*

³⁴² *Id.* at 11.

³⁴³ *Id.*

³⁴⁴ *Id.*

³⁴⁵ *Id.*

³⁴⁶ *Id.*

³⁴⁷ *Id.* at 12.

³⁴⁸ *Id.*

Parties argue that, as required by Order No. 1000, each region has an open and transparent mechanism for evaluating the benefits of the interregional transmission projects to the region which will provide adequate data upon which each region can evaluate the interregional transmission projects.³⁴⁹

148. In response to AWEA's protests that Western Filing Parties lack a unified or common method to determine the benefits each Relevant Planning Region will receive because each region may use its own approach to determine its benefits, ColumbiaGrid Answering Parties state that each region will evaluate an interregional project pursuant to its regional planning process to determine if the project meets its regional needs more efficiently or cost-effectively than a regional project.³⁵⁰ ColumbiaGrid Applicants claim that AWEA's argument is a collateral attack on the regional benefits methods of the transmission planning regions in the western interconnection.³⁵¹

149. ColumbiaGrid Answering Parties add that Western Filing Parties have a common interregional cost allocation method and that by evaluating potential interregional solutions on the same footing and at the same time as potential regional solutions, the goal of facilitating necessary infrastructure development is served more effectively than it would be under a framework in which interregional transmission projects are carved out for separate and disparate processing.³⁵²

150. Western Answering Parties argue that, contrary to Public Interest Organizations' assertion, the proposed interregional cost allocation proposal complies with Interregional Cost Allocation Principle 1.³⁵³ Western Answering Parties argue that, for an interregional transmission project to be eligible for interregional cost allocation, the project must have satisfied each region's regional criteria.³⁵⁴ Western Answering Parties explain that, at the regional level, an interregional transmission project must have been shown to produce benefits to those within each region in a manner that is at least roughly commensurate with the estimated costs to those in the region. In addition, Western

³⁴⁹ *Id.*

³⁵⁰ ColumbiaGrid Answering Parties Answer at 11.

³⁵¹ *Id.*

³⁵² *Id.* at 11-12.

³⁵³ Western Answering Parties Second Answer at 13-14.

³⁵⁴ *Id.*

Answering Parties contend that, because the Commission will approve a regional cost allocation method only if it satisfies the “commensurate with benefits” standard, Western Filing Parties’ proposed interregional cost allocation method satisfies the Order No. 1000 requirement. Western Answering Parties add that the proposed method assigns costs among regions on a *pro rata* basis, with each region receiving an assignment of project costs based solely on its percentage share of the project benefits.³⁵⁵

151. Western Answering Parties assert that, although different regions may use a different calculus to evaluate the regional benefits of the interregional project, their interregional cost allocation proposal does not violate Interregional Cost Allocation Principle 1 because the principle only requires costs to be roughly commensurate with benefits. Western Answering Parties claim that the Commission’s acceptance of each region’s respective regional cost allocation proposal, which requires costs be allocated among beneficiaries in a method that is roughly commensurate with benefits, shows that their proposed interregional cost allocation method meets Interregional Cost Allocation Principle 1.³⁵⁶

152. In addition, Western Answering Parties disagree with Public Interest Organizations’ arguments that Western Filing Parties’ proposal violates Interregional Cost Allocation Principle 1 because a Relevant Planning Region is able to opt-out of interregional cost allocation even if the interregional coordination process predicts benefits within that region. Western Answering Parties respond that the decision whether to participate in an individual project is made by each region through its regional planning process.³⁵⁷ Western Answering Parties argue that Order No. 1000-A made it clear that one region cannot impose costs on another region without approval.³⁵⁸ Western Answering Parties also contend that establishing an interregional cost allocation method to determine benefits will needlessly complicate and delay project development.³⁵⁹ Western Answering Parties add that, if the interregional cost allocation method for determining regional benefits differs from the regional cost allocation method for

³⁵⁵ *Id.* at 15.

³⁵⁶ *Id.* at 16.

³⁵⁷ *Id.* at 17.

³⁵⁸ *Id.* (citing Order No. 1000-A, 139 FERC ¶ 61,132 at PP 500, 511 and 711).

³⁵⁹ *Id.*

determining regional benefits, the region may often be unable to make a determination with regard to the interregional transmission project.³⁶⁰

153. With respect to SoCal Edison's comments that cost allocation must be binding, Western Answering Parties contend that, if SoCal Edison suggests that a region must agree to accept the calculated allocation of a proposed interregional transmission project, such a requirement would be contrary to Order No. 1000's explicit statement that each region under its regional transmission planning process will decide whether to include an interregional transmission project in its regional plan for the purposes of cost allocation.³⁶¹ Western Answering Parties argue that the relevant cost allocation rules in their interregional compliance filings meet Order No. 1000's cost allocation principles because they are premised upon a Commission-accepted regional cost allocation method for each region.³⁶² Specifically, Western Answering Parties note that, by allocating interregional transmission project costs on a *pro rata* basis among regions based on the projected benefits in each Relevant Planning Region, their interregional cost allocation process complies with Interregional Cost Allocation Principle 1 because it ensures that costs are allocated in a manner that is roughly commensurate with estimated benefits.³⁶³

154. Western Answering Parties state that Public Interest Organizations' argument that the proposal does not include a process for participation by project sponsors that are not seeking interregional cost allocation is incorrect.³⁶⁴ Western Answering Parties explain that section 4 of the common tariff language allows joint evaluation of any proposed interregional project that is submitted in any of the Relevant Planning Region's regional transmission planning processes.³⁶⁵

155. Further, Western Answering Parties respond that, contrary to Public Interest Organizations assertion, cost allocation sections 5.1 and 5.2 of the common tariff

³⁶⁰ *Id.* at 17-18.

³⁶¹ Western Answering Parties Answer at 12-13 (referencing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

³⁶² *Id.* at 13-14.

³⁶³ *Id.* at 14.

³⁶⁴ Western Answering Parties Second Answer at 10.

³⁶⁵ *Id.* at 10-11.

language do not only apply to transmission projects proposed by stakeholders; those sections also apply to transmission projects submitted in regional plans.³⁶⁶ Western Answering Parties explain that, regardless of the transmission project proponent, the initial step toward evaluation of the project is submittal to the regional transmission planning processes of the Relevant Planning Regions. Western Answering Parties state that transmission projects are not submitted at the interregional level because there is no interregional transmission planning process.³⁶⁷

156. In response to SoCal Edison's protest that it is unclear how other regions will internally assess charges and disburse funds associated with an interregional transmission project among the participating regions, Western Answering Parties note that the Commission has stated that each region will determine this matter.³⁶⁸

157. In response to Non-Public Utilities' request for clarification, Western Answering Parties confirm that a transmission project interconnecting to a facility owned by entities in multiple regions would have to be evaluated in the regional transmission planning processes.³⁶⁹ Western Answering Parties note that there may be instances when a transmission project developed solely to serve load within their service territories that are not proposed for regional or interregional cost allocation could interconnect with a facility jointly owned by entities in multiple planning regions.³⁷⁰

d. Commission Determination

158. As an initial matter, we find that Western Filing Parties have complied with Order No. 1000's requirement that neighboring regions propose a common interregional cost allocation method for interregional transmission facilities. The proposed common interregional cost allocation method will allocate interregional transmission facility costs to the Relevant Planning Regions on a *pro rata* basis based on the projected benefits received by each Relevant Planning Region, in accordance with their Commission-accepted regional cost allocation methods. In concert, the transmission planning regions

³⁶⁶ *Id.* at 18.

³⁶⁷ *Id.* at 19.

³⁶⁸ Western Answering Parties First Answer at 13 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 735).

³⁶⁹ *Id.* at 15-16.

³⁷⁰ *Id.*

must utilize common inputs, assumptions, and cost estimates in each regional transmission planning process to evaluate a proposed interregional transmission facility. We find that this general approach meets Order No. 1000's requirement to have a common interregional cost allocation method. By using the Commission-accepted regional transmission planning processes, the interregional cost allocation method will ensure that interregional transmission facilities are fairly evaluated and costs are properly allocated to each region based on each region's proportion of the total benefits of the interregional transmission project.³⁷¹

159. We find, however, that the proposed common tariff language does not accurately represent the cost allocation method each Relevant Planning Region will use to determine benefits. Specifically, the common tariff language provides that Western Filing Parties are to “determine regional benefits, stated in dollars, resulting from an [interregional transmission project]; on making such determination of its regional benefits in [[Planning Region]], [[Planning Region]] is to use its regional cost allocation methodology, as applied to [interregional transmission projects].”³⁷² However, CAISO's Commission-accepted regional cost allocation method does not include any regional determination of benefits to be applied to regional or interregional transmission facilities. Instead, under its regional cost allocation method, CAISO allocates the costs of regional transmission facilities to all users of the CAISO-controlled grid based on their actual MWh use of the system.³⁷³ Therefore, pursuant to section 5.2(c) of the common tariff language, as currently proposed, it is unclear how CAISO will determine regional benefits, stated in dollars, resulting from a proposed interregional transmission facility, pursuant to its regional cost allocation methodology, such that the Relevant Planning Regions can each calculate their *pro rata* and total shares of interregional transmission facility costs³⁷⁴ to determine whether the proposed interregional transmission facility is a more efficient or cost-effective solution to a regional transmission need. Accordingly, we direct Western Filing Parties to submit a compliance filing, within 60 days of the issuance of this order, revising section 5.2(c) of the common tariff language to incorporate CAISO's method for determining the regional benefits of a proposed interregional transmission facility. Likewise Bonneville Power should also submit a further compliance filing that addresses this issue.

³⁷¹ Common Tariff, § 5.2 (c). *E.g.*, PacifiCorp OATT, Attachment K § 4.5.2(c).

³⁷² *Id.*

³⁷³ California Independent System Operator Corporation, CAISO eTariff (OATT), § 26.1 (Access Charges) (2.0.0).

³⁷⁴ Common Tariff, §§ 5.2 (d)-(e).

160. In addition, we find that Western Filing Parties have complied with Order No. 1000's requirement that an interregional transmission project must be selected in each relevant regional transmission plan for purposes of cost allocation to use the interregional cost allocation method. As provided by section 6 of the common tariff language, a Relevant Planning Region may apply its regional cost allocation method to an interregional transmission project if it has selected the interregional transmission project in its regional transmission plan for purposes of cost allocation.³⁷⁵ We note that the common tariff language does not include an agreement that allows costs to be allocated to beneficiaries that are located outside of the region(s) in which the interregional transmission facilities are located.

161. We find that the Western Filing Parties proposal partially complies with the Interregional Cost Allocation Principles of Order No. 1000. We find that Western Filing Parties, with the exception of CAISO, have complied with Interregional Cost Allocation Principle 1. We first address protestors' arguments that the general framework proposed by Western Filing Parties does not comply with Interregional Cost Allocation Principle 1 and then explain why CAISO's proposal does not meet Interregional Cost Allocation Principle 1.

162. We disagree with commenters' argument that Western Filing Parties' proposal lacks a common method for estimating benefits and therefore fails to satisfy the requirements of Order No. 1000. Western Filing Parties' proposal sets forth a universally-applied *pro rata* cost allocation method that uses common inputs, assumptions, and cost estimates. We find that Western Filing Parties' reliance on their respective Commission-accepted benefit analysis methods is a satisfactory common method that will ensure that the Relevant Planning Regions will each be allocated costs for interregional transmission facilities commensurate with their estimated benefits. We note that Order No. 1000 does not impose interregional transmission planning on top of the regional transmission planning process, with duplicative assessments of needs and benefits.³⁷⁶

163. We disagree with SDG&E's suggestion that we direct the regions to respond to a project proponent's claim that an interregional transmission facility offers more reasonably quantifiable benefits than identified in the regions' evaluations. Because the benefit evaluations are conducted in the Commission-accepted regional transmission planning process, we find that benefits will be appropriately evaluated and addressed there. We note that a project proponent can participate in the regional transmission

³⁷⁵ Common Tariff § 6.1. *E.g.*, PacifiCorp OATT, Attachment K § 4.6.1.

³⁷⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at P 511.

planning process as a stakeholder to address any issues with the benefits analysis of a particular interregional transmission facility. For these reasons, we find that SDG&E's recommendation that Western Filing Parties adopt TEAM is beyond the requirements of Order No. 1000.

164. We agree with SoCal Edison and Public Interest Organizations that interregional cost allocation determinations are binding on the transmission planning regions that have selected a proposed interregional transmission facility in their regional transmission plans for purposes of cost allocation, pursuant to each transmission planning region's determination that the proposed transmission facility is a more efficient or cost-effective solution to a regional transmission need. However, SoCal Edison and Public Interest Organizations have not pointed to anything in Western Filing Parties' proposal that is inconsistent with binding cost allocation. While Public Interest Organizations point to proposed tariff language permitting each Relevant Planning Region to determine whether a proposed interregional transmission facility is a more efficient or cost-effective transmission solution to a regional transmission need and either selecting the proposed interregional transmission facility in its regional transmission plan for purposes of cost allocation, based on its determination, or not,³⁷⁷ we disagree that such an evaluation is tantamount to non-binding cost allocation. In response to Public Interest Organizations' concern that the proposed language creates a "free rider" problem, we note that while the Commission recognizes in Order No. 1000 that it seeks to minimize or eliminate free riders on the transmission grid,³⁷⁸ it still requires the development of a formal procedure to identify and jointly evaluate interregional transmission facilities that may resolve each region's needs more efficiently or cost-effectively.³⁷⁹

165. While we find that the Western Filing Parties' proposed general interregional cost allocation framework complies with Interregional Cost Allocation Principle 1, we find that CAISO does not fully comply with this requirement. CAISO's proposed method to assign a dollar value to the benefits that it will consider in allocating the costs of an interregional transmission facility pursuant to the proposed interregional cost allocation method differs from the other Western Filing Parties. NTTG, ColumbiaGrid, and WestConnect will each use their respective Commission-accepted regional cost allocation methods to calculate their assigned *pro rata* share of the projected costs of an interregional transmission facility. Under this proposal NTTG, ColumbiaGrid, and

³⁷⁷ Common Tariff, §§ 5.2(e)-(f).

³⁷⁸ See Order No. 1000, FERC Stats. & Regs. ¶ 31,323, at P 640; Order No. 1000-A, 139 FERC ¶ 61,132 at P 578.

³⁷⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 435.

WestConnect will assign a specific dollar amount to the benefits (e.g., avoided costs, production cost savings, reduction in reserve sharing requirements, and reducing line losses) of an interregional transmission facility. Unlike the other Western Filing Parties, CAISO proposes an avoided cost-only approach to select an interregional transmission project in its regional transmission plan for purposes of cost allocation if CAISO determines that the proposed project is a more efficient or cost-effective solution to a regional transmission need and can be constructed and operational in the same timeframe as the regional transmission solution.³⁸⁰

166. We find that CAISO's avoided cost-only approach to estimate regional transmission benefits is inconsistent with Order No. 1000's Interregional Cost Allocation Principle 1 that requires that the costs of a new interregional transmission facility must be allocated to each transmission planning region in which the transmission facility is located in a manner that is at least roughly commensurate with the estimated benefits of that transmission facility in each of the transmission planning regions. A benefit used by public utility transmission providers in an interregional cost allocation method or methods must be an identifiable benefit, and the transmission facility cost allocated must be roughly commensurate with that benefit.³⁸¹ The Commission stated that, once beneficiaries are identified, public utility transmission providers would then be able to identify what is the more efficient or cost-effective transmission solution or assess whether costs are being allocated at least roughly commensurate with benefits.³⁸² We agree with SDG&E that the difference between CAISO's *avoided cost-only* method to calculate benefits and the other Western Filing Parties' methods of calculating *avoided costs-plus* other benefits may result in CAISO consistently paying a disproportionately lower share of costs for an interregional transmission project. Therefore, costs may not be allocated roughly commensurate with benefits among the Western Filing Parties. We note, for example, that in Phase 2 of CAISO's regional transmission planning process, CAISO considers benefits such as congestion costs and transmission losses, in addition to avoided costs, when evaluating projects addressing regional reliability and economic needs, as well as transmission needs driven by public policy requirements.³⁸³ Such an

³⁸⁰ CAISO Tariff §24.17.3.

³⁸¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 625.

³⁸² Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

³⁸³ For example, in addition to avoided costs for reliability projects, CAISO considers, for policy-driven transmission solutions, among other things, commercial interest in the resources in the applicable geographic area accessed by the transmission solution, the results and identified priorities of the California Public Utilities

approach for interregional cost allocation would allow for an accounting of interregional transmission facility benefits and promote consistency between neighboring regions consistent with Order No. 1000. Accordingly, we direct CAISO to submit, within 60 days of the date of issuance of this order, a further compliance filing that remedies the discrepancy between the estimation of regional benefits among the four regions.

167. We find that Western Filing Parties' proposal complies with Interregional Cost Allocation Principle 2. Under Western Filing Parties' proposal, those regions that do not benefit from an interregional transmission facility are not allocated costs associated with that interregional transmission facility.³⁸⁴ Furthermore, if a Relevant Planning Region determines that a proposed interregional transmission facility will not meet any of its regional transmission needs, it ceases being a Relevant Planning Region for purposes of allocating the costs of that particular transmission facility, has no further obligation to participate in the evaluation of the interregional transmission facility, and will not be allocated costs attributable to that interregional transmission facility.³⁸⁵

168. We find that Western Filing Parties' proposal complies with Interregional Cost Allocation Principle 3 because they do not propose to apply a benefit to cost ratio.

169. We find that Western Filing Parties' proposal complies with Interregional Cost Allocation Principle 4. Under the Western Filing Parties' proposal, a Relevant Planning Region is defined as the planning region that would directly interconnect electrically with an interregional transmission facility. Consistent with Interregional Cost Allocation Principle 4, in order to be allocated project costs, a Relevant Planning Region must have selected the interregional transmission facility in its regional transmission plan for purposes of cost allocation.³⁸⁶ Further, if a Relevant Planning Region determines that a proposed interregional transmission facility will not meet any of its regional transmission needs, it ceases being a Relevant Planning Region for purposes of allocating the costs of

Commission, the expanded planning level costs of the transmission solution as compared to the potential planning level costs of other transmission solutions, and the potential capacity value and energy value of resources in particular zones that will meet the policy requirements. For economic solutions, CAISO considers, among other things, reductions in production costs, congestion costs, transmission losses, capacity or the electric supply costs resulting from improved access to cost-efficient resources.

³⁸⁴ *E.g.*, PacifiCorp Transmittal Letter at 24.

³⁸⁵ Common Tariff § 4.2 (c). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(c).

³⁸⁶ Common Tariff § 5.2 (d). *E.g.*, PacifiCorp OATT, Attachment K § 4.5.2(d).

that particular facility, has no further obligation to participate in the evaluation of the interregional transmission facility, and will not be allocated costs attributable to that interregional transmission facility.³⁸⁷

170. We find that Western Filing Parties' proposal complies with Interregional Cost Allocation Principle 5 because they propose to use their respective Commission-accepted regional transmission planning processes for identifying benefits, which are already subject to the transparency requirements of Order No. 1000.

171. We disagree with AWEA's comment that Western Filing Parties' proposed method of conducting its benefits analysis violates the transparency requirements of Interregional Cost Allocation Principle 5. Under Western Filing Parties' proposal, each Relevant Planning Region will conduct its benefit analysis through its regional transmission planning process, which is subject to the transparency requirements of Order No. 1000 and Commission acceptance. Therefore, the benefit valuations reached by Relevant Planning Regions in the identification and evaluation of interregional transmission facilities will follow the same transparency requirements as the Commission-accepted regional transmission planning processes.

172. We find that Western Filing Parties' proposal complies with Interregional Cost Allocation Principle 6 because it applies a single interregional cost allocation method to all interregional transmission facilities, recognizing that such interregional transmission facilities will address regional transmission needs driven by reliability, economic and/or public policy requirements.³⁸⁸

173. Responding to additional concerns raised by protestors, we will not require Western Filing Parties to include an additional interregional process for merchant transmission developers or other project sponsors that wish to have their transmission projects included in the interregional coordination process but are not seeking interregional cost allocation, as Public Interest Organizations request. This request goes beyond the interregional coordination and cost allocation requirements of Order No. 1000. We also note that merchant transmission developer projects and other transmission projects not proposed for regional or interregional cost allocation are already considered through the regional transmission planning processes. Order No. 1000 requires public utility transmission providers in each transmission planning region to propose the information and data a merchant transmission developer must provide to the *regional* transmission planning process to allow the public utility

³⁸⁷ Common Tariff § 4.2 (c). *E.g.*, PacifiCorp OATT, Attachment K § 4.4.2(c).

³⁸⁸ *E.g.*, PacifiCorp Transmittal Letter at 26.

transmission providers in the transmission planning region to assess the potential reliability and operational impacts of the merchant transmission developer's proposed transmission facilities on other systems in the region.³⁸⁹ For this reason, the interregional coordination process, through the regional transmission planning processes, contains the process requested by the Commission in Order No. 1000.

174. Furthermore, we accept Non-Public Utilities' clarification, and Western Filing Parties confirmation, of the proposed Submission Requirements subsection under the "[Interregional Transmission Project] Joint Evaluation Process" section.³⁹⁰ Under the proposal, it is up to the proponent of a transmission project, which would directly interconnect electrically to existing or planned transmission facilities in two or more transmission planning regions, to choose whether or not to submit its transmission project for evaluation in the appropriate regions to qualify for cost allocation. We note that, by relying on the regional transmission planning processes, the interregional coordination processes will consider these transmission projects in the evaluation of other interregional transmission facilities that are submitted for purposes of cost allocation.

175. Moreover, we will not direct Western Filing Parties to include a mechanism for assessing and collecting costs from other regions associated with an interregional transmission facility, as requested by SoCal Edison. We find the issue raised by SoCal Edison is a matter of cost recovery and thus is outside the scope of Order No. 1000. While the Commission permitted public utility transmission providers to include cost recovery provisions in their Order No. 1000 compliance filings, it explained that it did not require them to do so.³⁹¹ Here, Western Filing Parties have not proposed any cost recovery provisions and we will not direct them to include such provisions in this proceeding. We therefore deny SoCal Edison's request.

176. Finally, we find that CAISO and ColumbiaGrid Applicants' additional tariff provisions, which serve to further implement the interregional cost allocation method, comply with Order No. 1000.³⁹² The additional provisions are consistent with the common language and provide further clarity.

³⁸⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 164.

³⁹⁰ *E.g.*, PacifiCorp OATT, Attachment K § 4.4.1.

³⁹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 563; Order No. 1000-A, 139 FERC ¶ 61,132 at P 616.

³⁹² CAISO eTariff (OATT), § 24.13; *E.g.*, Avista, OATT, Attachment K, Part IV, §§ 14.5, 14.5, 14.6.

The Commission orders:

(A) Western Filing Parties' compliance filings are hereby accepted, as modified, subject to further compliance filings, effective October 1, 2015, as requested.

(B) Western Filing Parties are hereby directed to submit further compliance filings, within 60 days of the date of issuance of this order, as discussed in the body of this order.

(C) Bonneville Power's petition for declaratory order is hereby granted in part, subject to further compliance filings; and

(D) Bonneville Power's request for exemption from the filing fee is hereby granted.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Appendix A: Abbreviated Names of Intervenors

The following tables contain the abbreviated names of intervenors that are used in this Order on Compliance Filings.

Intervenors in the table below filed notices of intervention in all of the following dockets:

Public Service Company of New Mexico	<u>Docket No. ER13-1447-000</u>
NorthWestern Corporation	<u>Docket No. ER13-1448-000</u>
Arizona Public Service Company	<u>Docket No. ER13-1450-000</u>
Deseret Generation & Transmission	
Co-operative, Inc.	<u>Docket No. ER13-1457-000</u>
Tucson Electric Power Company	<u>Docket No. ER13-1461-000</u>
UNS Electric, Inc.	<u>Docket No. ER13-1462-000</u>
Portland General Electric Company	<u>Docket No. ER13-1463-000</u>
El Paso Electric Company	<u>Docket No. ER13-1465-000</u>
NV Energy	<u>Docket No. ER13-1466-000</u>
Idaho Power Company	<u>Docket No. ER13-1467-000</u>
Public Service Company of Colorado	<u>Docket No. ER13-1469-000</u>
Cheyenne Light, Fuel and Power Company	<u>Docket No. ER13-1471-000</u>
Black Hills Power, Inc.	<u>Docket No. ER13-1472-000</u>
PacifiCorp	<u>Docket No. ER13-1473-000</u>
Black Hills/Colorado Electric Utility	<u>Docket No. ER13-1474-000</u>
Company, LP	

Abbreviation	Intervenor(s)
Avista	Avista Corporation
Bonneville Power	United States Department of Energy – Bonneville Power Administration
E. ON Climate & Renewables North America, LLC	E. ON Climate & Renewables North America, LLC
Non-Public Utilities	Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and

	Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration
Northern California Power Agency	Northern California Power Agency
NW Energy Coalition	NW Energy Coalition
Public Interest Organizations*	Natural Resources Defense Council, The Sustainable FERC Project, Center for Energy Efficiency and Renewable Technologies, Clean Coalition, Interstate Renewable Energy Council, Interwest Energy Alliance, Renewable Northwest Project, Sierra Club, Sonoran Institute, Western Grid Group, Western Resource Advocates, and The Wilderness Society
Puget Sound	Puget Sound Energy, Inc.
SDG&E	San Diego Gas & Electric Company
SoCal Edison	Southern California Edison Company
State Water Project	California Department of Water Resources State Water Project

* late intervention

California Independent System Operator Corporation
Docket No. ER13-1470-000

Abbreviation	Intervenor(s)
Avista	Avista Corporation

AWEA*	American Wind Energy Association
Bonneville Power	United States Department of Energy – Bonneville Power Administration
CPUC*	Public Utilities Commission of the State of California
E. ON Climate & Renewables North America, LLC	E. ON Climate & Renewables North America, LLC
Modesto	Modesto Irrigation District
M-S-R	The City of Santa Clara, California, and the M-S-R Public Power Agency
Non-Public Utilities	Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration
Northern California Power Agency	Northern California Power Agency
NW Energy Coalition	NW Energy Coalition
PG&E	Pacific Gas and Electric Company
Public Interest Organizations*	Natural Resources Defense Council, The Sustainable FERC Project, Center for Energy Efficiency and Renewable Technologies, Clean Coalition, Interstate Renewable Energy Council, Interwest Energy Alliance, Renewable

	Northwest Project, Sierra Club, Sonoran Institute, Western Grid Group, Western Resource Advocates, and The Wilderness Society
Puget Sound	Puget Sound Energy, Inc.
SDG&E	San Diego Gas & Electric Company
Six Cities	The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California
SoCal Edison	Southern California Edison Company
State Water Project	California Department of Water Resources State Water Project

* late intervention

Puget Sound Energy, Inc.
Docket No. ER13-1729-000

Abbreviation	Intervenor(s)
Avista	Avista Corporation
Bonneville Power	United States Department of Energy – Bonneville Power Administration
E. ON Climate & Renewables North America, LLC	E. ON Climate & Renewables North America, LLC
MATL*	MATL LLP
Non-Public Utilities	Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and

Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration

NW Energy Coalition

NW Energy Coalition

Public Interest Organizations

Interwest Energy Alliance, Natural Resources Defense Council, Renewable Northwest Project, Sierra Club, Western Grid Group, Western Resources Advocates, and The Wilderness Society

* late intervention

Avista Corporation
Docket No. ER13-1730-000

Abbreviation	Intervenor(s)
Bonneville Power	United States Department of Energy – Bonneville Power Administration
E. ON Climate & Renewables North America, LLC	E. ON Climate & Renewables North America, LLC
MATL*	MATL LLP
Non-Public Utilities	Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area

	Power Administration
NW Energy Coalition	NW Energy Coalition
Public Interest Organizations	Interwest Energy Alliance, Natural Resources Defense Council, Renewable Northwest Project, Sierra Club, Western Grid Group, Western Resources Advocates, and The Wilderness Society
Puget Sound	Puget Sound Energy, Inc.

* late intervention

**United States Department of Energy –
Bonneville Power Administration
Docket No. NJ13-10-000**

Abbreviation	Intervenor(s)
Avista	Avista Corporation
E. ON Climate & Renewables North America, LLC	E. ON Climate & Renewables North America, LLC
Iberdrola	Iberdrola Renewables, LLC
MATL*	MATL LLP
NW Energy Coalition	NW Energy Coalition
PacifiCorp	PacifiCorp
Puget Sound	Puget Sound Energy, Inc.
TANC	Transmission Agency of Northern California

* late intervention

Appendix B: Abbreviated Names of Initial Commenters

The following tables contain the abbreviated names of initial commenters that are used in this Order on Compliance Filings.

Initial Commenters

Initial commenters in the table below filed initial comments in all of the following dockets:

Public Service Company of New Mexico	<u>Docket No. ER13-1447-000</u>
NorthWestern Corporation	<u>Docket No. ER13-1448-000</u>
Arizona Public Service Company	<u>Docket No. ER13-1450-000</u>
Deseret Generation & Transmission	<u>Docket No. ER13-1457-000</u>
Co-operative, Inc.	
Tucson Electric Power Company	<u>Docket No. ER13-1461-000</u>
UNS Electric, Inc.	<u>Docket No. ER13-1462-000</u>
Portland General Electric Company	<u>Docket No. ER13-1463-000</u>
El Paso Electric Company	<u>Docket No. ER13-1465-000</u>
NV Energy	<u>Docket No. ER13-1466-000</u>
Idaho Power Company	<u>Docket No. ER13-1467-000</u>
Public Service Company of Colorado	<u>Docket No. ER13-1469-000</u>
California Independent System Operator	<u>Docket No. ER13-1470-000</u>
Corporation	
Cheyenne Light, Fuel and Power Company	<u>Docket No. ER13-1471-000</u>
Black Hills Power, Inc.	<u>Docket No. ER13-1472-000</u>
PacifiCorp	<u>Docket No. ER13-1473-000</u>
Black Hills/Colorado Electric Utility	<u>Docket No. ER13-1474-000</u>
Company, LP	

Abbreviation	Commenter(s)
AWEA ^{*393}	American Wind Energy Association
Non-Public Utilities	Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte

³⁹³ AWEA submitted comments out of time on July 17, 2013.

River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration

Public Interest Organizations*³⁹⁴

Natural Resources Defense Council, The Sustainable FERC Project, Center for Energy Efficiency and Renewable Technologies, Clean Coalition, Interstate Renewable Energy Council, Interwest Energy Alliance, Renewable Northwest Project, Sierra Club, Sonoran Institute, Western Grid Group, Western Resource Advocates, and The Wilderness Society

SDG&E +

San Diego Gas & Electric Company

SoCal Edison +

Southern California Edison Company

* late comments

+ protests

**Puget Sound Energy, Inc.
Avista Corporation**

**Docket No. ER13-1729-000
Docket No. ER13-1730-000**

Abbreviation

Commenter(s)

AWEA

American Wind Energy Association

³⁹⁴ Public Interest Organizations submitted comments out of time on July 3, 2013.

Non-Public Utilities

Basin Electric Power Cooperative,
Colorado Springs Utilities, Imperial
Irrigation District, Los Angeles
Department of Water and Power, Platte
River Power Authority, Sacramento
Municipal Utility District, Salt River
Project Agricultural Improvement and
Power District, Southwest Transmission
Cooperative, Inc., Transmission Agency
of Northern California, Tri-State
Generation and Transmission
Association, Inc., and Western Area
Power Administration

Public Interest Organizations

Interwest Energy Alliance, Natural
Resources Defense Council, Renewable
Northwest Project, Sierra Club, Western
Grid Group, Western Resources
Advocates, and The Wilderness Society

Bonneville Power Administration
Docket No. NJ13-10-000

Abbreviation

Intervenor(s)

AWEA

American Wind Energy Association

Appendix C: Abbreviated Names of Reply Commenters

The following tables contain the abbreviated names of reply commenters that are used in this Order on Compliance Filings.

Reply Commenters

Reply commenters in the table below filed reply comments in all of the following dockets:

Public Service Company of New Mexico	<u>Docket No. ER13-1447-000</u>
NorthWestern Corporation	<u>Docket No. ER13-1448-000</u>
Arizona Public Service Company	<u>Docket No. ER13-1450-000</u>
Deseret Generation & Transmission	
Co-operative, Inc.	<u>Docket No. ER13-1457-000</u>
Tucson Electric Power Company	<u>Docket No. ER13-1461-000</u>
UNS Electric, Inc.	<u>Docket No. ER13-1462-000</u>
Portland General Electric Company	<u>Docket No. ER13-1463-000</u>
El Paso Electric Company	<u>Docket No. ER13-1465-000</u>
NV Energy	<u>Docket No. ER13-1466-000</u>
Idaho Power Company	<u>Docket No. ER13-1467-000</u>
Public Service Company of Colorado	<u>Docket No. ER13-1469-000</u>
California Independent System Operator	<u>Docket No. ER13-1470-000</u>
Corporation	
Cheyenne Light, Fuel and Power Company	<u>Docket No. ER13-1471-000</u>
Black Hills Power, Inc.	<u>Docket No. ER13-1472-000</u>
PacifiCorp	<u>Docket No. ER13-1473-000</u>
Black Hills/Colorado Electric Utility	<u>Docket No. ER13-1474-000</u>
Company, LP	

Abbreviation

Commenter(s)

Western Answering Parties ³⁹⁵

Public Service Company of New Mexico, NorthWestern Corporation, Arizona Public Service Company, Deseret Generation & Transmission Co-

³⁹⁵ Western Answering Parties filed two answers: (1) an answer to Non-Public Utilities' comments and SoCal Edison's and SDG&E's limited protests on July 9, 2013, and (2) an answer to Public Interest Organization's late-filed comments on July 18, 2013.

operative, Inc., Tucson Electric Power Company, UNS Electric, Inc., Portland General Electric Company, El Paso Electric Company, NV Energy, Idaho Power Company, Public Service Company of Colorado, California Independent System Operator Corporation, Cheyenne Light, Fuel and Power Company, Black Hills Power, Inc., PacifiCorp, Black Hills/Colorado Electric Utility Company, LP

**Puget Sound Energy, Inc.
Avista Corporation
United States Department of Energy –
Bonneville Power Administration**

**Docket No. ER13-1729-000
Docket No. ER13-1730-000
Docket No. NJ13-10-000**

Abbreviation

Commenter(s)

ColumbiaGrid Answering Parties³⁹⁶

Puget Sound Energy, Inc., Avista Corporation, and United States Department of Energy – Bonneville Power Administration

³⁹⁶ Puget Sound, Avista, and Bonneville filed an answer on August 20, 2013.

Appendix D: eTariff Records

The following table contains the eTariff records that are addressed in this Order on Compliance Filings. Shorthand eTariff record citations are only provided for those records that are explicitly addressed in this Order on Compliance Filings.

Region	Filing Party Short Cite	Docket No.	Tariff Record Citation	Shorthand Tariff Record Citation
CAISO				
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT) (OATT), § 24.2 (Nature of the Transmission Planning Process) (4.0.0).	CAISO, OATT, § 24.2 (4.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.3.1 (Inputs to the Unified Planning Assumptions and Study Plan) (4.0.0).	CAISO, OATT, § 24.3.1 (4.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.4.3 (Phase 2 Request Window) (3.0.0).	CAISO, OATT, § 24.4.3 (3.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.4.8 (Additional Contents of Comprehensive Transmission Plan) (3.0.0).	CAISO, OATT, § 24.4.8 (3.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.4.10 (Transmission Plan Approval Process) (4.0.0).	CAISO, OATT, § 24.4.10 (4.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.8.4 (Information from Balancing Authority Areas and Regulators) (2.0.0).	CAISO, OATT, § 24.8.4 (2.0.0).

CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.12 (WECC and Interregional Coordination) (3.0.0).	CAISO, OATT, § 24.12 (3.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.13 (Interregional Transmission Proposals in the Regional Process) (2.0.0).	CAISO, OATT, § 24.13 (2.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.13.1 ([Not Used]) (2.0.0).	CAISO, OATT, § 24.13.1 (2.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.13.2 ([Not Used]) (2.0.0).	CAISO, OATT, § 24.13.2 (2.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17 (Evaluation of Interregional Transmission Projects) (1.0.0).	CAISO, OATT, § 24.17 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18 (Order 1000 Common Interregional Tariff) (1.0.0).	CAISO, OATT, § 24.18 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17.1 (Submission of Interregional Transmission Projects) (1.0.0).	CAISO, OATT, § 24.17.1 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18.1 (Annual Interregional Information Exchange) (1.0.0).	CAISO, OATT, § 24.18.1 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17.2 (Interregional	CAISO, OATT, § 24.17.2 (1.0.0).

CAISO	ER13-1470-000	Transmission Project Assessment) (1.0.0). CAISO, CAISO eTariff (OATT), § 24.17.3 (Selection in the Comprehensive Transmission Plan) (1.0.0).	CAISO, OATT, § 24.17.3 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18.2 (Annual Interregional Coordination Meeting) (1.0.0).	CAISO, OATT, § 24.18.2 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17.4 (Interregional Transmission Project Cost Recovery) (1.0.0).	CAISO, OATT, § 24.17.4 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18.3 (Interregional Transmission Project Joint Evaluation Process) (1.0.0).	CAISO, OATT, § 24.18.3 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17.5 (Monitoring the Status of Interregional Transmission Projects) (1.0.0).	CAISO, OATT, § 24.17.5 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18.4 (Interregional Cost Allocation Process) (1.0.0).	CAISO, OATT, § 24.18.4 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.17.6 (Delay in Interregional Transmission Project In Service Date) (1.0.0).	CAISO, OATT, § 24.17.6 (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), § 24.18.5 (Application of	CAISO, OATT, § 24.18.5 (1.0.0).

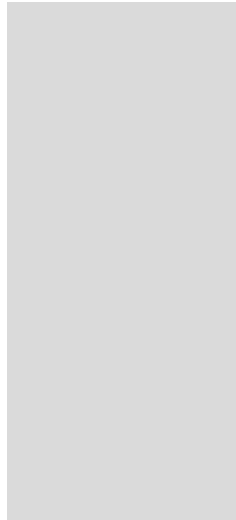
CAISO	ER13-1470-000	Regional Cost Allocation Methodology) (1.0.0). CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Annual Interregional Coordination Meeting (1.0.0).	CAISO, OATT, app. A, Annual Interregional Coordination Meeting (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Annual Interregional Information (1.0.0).	CAISO, OATT, app. A, Annual Interregional Information (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Interregional Cost Allocation (1.0.0).	CAISO, OATT, app. A, Interregional Cost Allocation (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Annual Interregional Coordination Meeting (1.0.0).	CAISO, OATT, app. A, Annual Interregional Coordination Meeting (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Interregional Transmission Project (1.0.0).	CAISO, OATT, app. A, Interregional Transmission Project (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Order 1000 Common Interregional Coordination and Cost Allocation (1.0.0).	CAISO, OATT, app. A, Order 1000 Common Interregional Coordination and Cost Allocation (1.0.0).
CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Planning Region (1.0.0).	CAISO, OATT, app. A, Planning Region (1.0.0).

	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Regional Transmission Revenue Requirement (2.0.0).	CAISO, OATT, app. A, Regional Transmission Revenue Requirement (2.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix A (Definitions), Relevant Planning Regions (1.0.0).	CAISO, OATT, app. A, Relevant Planning Regions (1.0.0).
	CAISO	ER13-1470-000	CAISO, CAISO eTariff (OATT), Appendix F (Rate Schedules) (13.0.0).	CAISO, OATT, app. F (13.0.0).
ColumbiaGrid				
	Avista	ER13-1730-000	Avista, FERC Electric Tariff No. 8 (OATT), OATT Attachment, Attachment K (Transmission Planning Process) (8.0.0).	Avista, OATT, Attachment K (8.0.0).
	Bonneville Power	NJ13-10-000	Bonneville Power, Tariffs, Attachment K (Transmission Planning Process) (2.0.0).	Bonneville, OATT, Attachment K (2.0.0).
	MATL	ER14-346-001	MATL, Original Volume No. 0 (OATT), Title Page, Attachment K (Transmission Planning Process) (2.0.0).	MATL, OATT, Title Page, Attachment K (2.0.0).
	Puget Sound	ER13-1729-000	Puget Sound, OATT, Attachment K (Transmission Planning Process), Part I (Introduction) (2.0.0).	Puget Sound, OATT, Attachment K, pt. I (2.0.0).
	Puget Sound	ER13-1729-000	Puget Sound, OATT, Attachment K (Transmission Planning Process), Part III	Puget Sound, OATT, Attachment K, pt. III (2.0.0).

	Puget Sound	ER13-1729-000	(Columbia Grid Transmission Planning Process) (2.0.0). Puget Sound, OATT, Attachment K (Transmission Planning Process), Part VII (Economic Studies) (2.0.0).	Puget Sound, OATT, Attachment K, pt. VII (2.0.0).
	Puget Sound	ER13-1729-000	Puget Sound, OATT, Attachment K (Transmission Planning Process), Appendix A (Definitions) (2.0.0).	Puget Sound, OATT, Attachment K, App. A (2.0.0).
NTTG				
	Deseret	ER13-1457-000	Deseret, OATT, Attachment K (Transmission Planning Process) (4.0.0).	Deseret, OATT, Attachment K (4.0.0).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Intro (Intro- Transmission Planning Process) (0.0.3).	Idaho Power, OATT, Attachment K, Intro (0.0.3).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Part A (Local Planning Process) (0.0.4).	Idaho Power, OATT, Attachment K, pt. A (0.0.4).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Part B (Regional Planning Process) (0.0.4).	Idaho Power, OATT, Attachment K, pt. B (0.0.4).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Part C (Interregional Coordination and Cost Allocation Process) (0.0.3).	Idaho Power, OATT, Attachment K, pt. C (0.0.3).

	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Part D (Interconnection-wide Planning Process) (0.0.3).	Idaho Power, OATT, Attachment K, pt. D (0.0.3).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Exhibit A (Planning Agreement) (0.0.2).	Idaho Power, OATT, Attachment K, Ex. A (0.0.2).
	Idaho Power	ER13-1467-000	Idaho Power, IPCo eTariff, OATT, Attachment K, Exhibit B (Economic Study Agreement) (0.0.0).	Idaho Power, OATT, Attachment K, Ex. B (0.0.0).
	NorthWestern	ER13-1448-000	NorthWestern, NorthWestern Corporation, NWE Montana OATT, FERC OATT Vol. 5, Attachment K (Transmission Planning Process) (2.0.0).	NorthWestern, OATT, Attachment K (2.0.0).
	PacifiCorp	ER13-1473-000	PacifiCorp, Transmission OATT and Service Agmts, OATT, Volume No. 11 (Attachment K - Transmission Planning Process) (3.0.0).	PacifiCorp, OATT, Volume No. 11 (3.0.0).
	Portland General	ER13-1463-000	Portland General, PGE OATT, Volume No. 8, Attachment K (Transmission Planning Process) (3.0.0).	Portland General, OATT, Attachment K (3.0.0).
WestConnect				
	APS	ER13-1450-000	APS, FERC Electric Tariff, Volume No. 2 (OATT), Table of Contents, Attachment E	APS, OATT, Table of Contents, Attachment E (1.1.0).

		(Regional Transmission Planning Process) (1.1.0). APS, FERC Electric Tariff, Volume No. 2 (OATT), Table of Contents, Attachment E, § VIII (Interregional Coordination and Cost Allocation) (1.1.0).	APS, OATT, Table of Contents, Attachment E, § VIII (1.1.0).
APS	ER13-1450-000	Black Hills, Joint OATT, Attachment K (Transmission Planning Process) (1.0.0).	Black Hills, Joint OATT, Attachment K (1.0.0).
Black Hills Power	ER13-1472-000	Black Hills/Colorado Electric, OATT, Attachment K (Transmission Planning Process) (3.0.0).	Black Hills/Colorado Electric, OATT, Attachment K (3.0.0).
Black Hills/Colorado Electric	ER13-1474-000	Cheyenne LF&P, OATT, Attachment K (Transmission Planning Process) (1.0.0).	Cheyenne LF&P, OATT, Attachment K (1.0.0).
Cheyenne LF&P	ER13-1471-000	El Paso, OATT, Attachment K (Transmission Planning Process) (2.0.0).	El Paso, OATT, Attachment K (2.0.0).
El Paso	ER13-1465-000	NV Energy, NVE Database, Tariff, Volume No. 1 (OATT), Attachment K (Transmission Planning Process) (0.2.0).	NV Energy, OATT, Attachment K (0.2.0).
NV Energy	ER13-1466-000	PSNM, PNM OATT, FERC Electric Tariff Volume No. 6, OATT (S-57) Attachment K (Transmission Planning Process) (0.2.0).	PSNM, OATT, Attachment K (0.2.0).
PNM	ER13-1447-000	PSCo, Transmission Tariffs, Xcel Energy Op Cos, Joint OATT, Table of Contents,	PSCo OATT, Attachment R-PSCo (0.2.0).
PSCo	ER13-1469-000		



Tucson Electric	ER13-1461-000	Attachments, Attachment R-PSCo (PSCo Transmission Planning Process) (0.2.0). Tucson Electric, OATT, Attachment K (Transmission Planning Process) (2.0.0).	Tucson Electric, OATT, Attachment K (2.0.0).
UNS Electric	ER13-1462-000	UNS Electric, OATT, Attachment K (Transmission Planning Process) (2.0.0).	UNS Electric, OATT, Attachment K (2.0.0).