



Entergy/ICT Attachment K: Hope over Experience?

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Coordination and Openness

- More effort needs to be made to address local and sub-regional planning issues (SPP 3.3)
- Stakeholder feedback on power flow models used to develop plans limited
 - Review and comment
 - Entergy supplies ICT with all data for Base Case Model
- P. 454 – “Customers must be included at the early stages of the development of the transmission plan and not merely given an opportunity to comment on plans...”



Transparency

- Replication principle (p. 471) not possible without full understanding of all tools in the planning toolbox (e.g. load throwover, switching procedures, manual/automatic operating guides, PTP reservations source and sink, etc.)
- Status of upgrades (p. 472) needs to be communicated on a more frequent basis (SPP 7.3)



Information Exchange

- **Attachment K does not address transparency of transmission provider data for native load service**
 - “The information collected by transmission providers to provide transmission service to their native load customers must be transparent and, to that end, equivalent information must be provided by transmission customers to ensure effective planning and comparability (p. 486).”



Comparability

- “each transmission provider must develop a transmission plan that...(2) otherwise treats similarly-situated customers (e.g. network and retail native load) comparably in transmission system planning” (P. 489)
- Need greater transparency and customer involvement from the start of the process to mitigate this concern



Regional Participation

- **Regional Planning**
 - This has been a significant problem in the past
 - Unclear why the transmission customer has the obligation to request studies if transmission provider is performing duties properly under P. 486
- **Need greater specificity regarding next steps if problems are identified**



Conclusions

- **Accountability vs. Ambiguity**
- **Balanced vs. Beholden**
- **Cooperation vs. Confusion**

