



## Inter-Regional and External Transmission Planning in the Southeast

Order No 890  
Transmission Planning Regional Technical Conferences  
October 1-2, 2007  
Atlanta, GA  
Session I, SERC-Wide Transmission Planning Efforts

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- My name is Joseph Pokalsky. I work at Energy Consulting Group here in Atlanta GA where I focus on on risk management and trading, asset and load optimization, energy and fuel procurement, tariff management, regulatory and legislative issues, energy clearing and settlement, as well as contract, credit and counterparty administration for a group of eight Georgia EMCs with a peak load of over 2,600 MW.
- I'm here this morning to speak to the recent Inter-Regional Participation White Paper.

## FERC Criteria for Determining Planning Regions

“527. Finally, the Commission acknowledges the importance of identifying the appropriate size and scope of the regions over which regional planning will be performed. We agree that *transmission providers, customers, affected state authorities, and other stakeholders should be involved in developing those regions*. We decline to mandate the geographic scope of particular planning regions at this time. *The scope of a particular planning region should be governed by the integrated nature of the regional power grid and the particular reliability and resource issues affecting individual regions and subregions*. In very large regions, there may well be both sub-regional and regional processes. For example, in the West there are various sub-regional processes in addition to a WECC regional planning process. We believe that such an approach can work, provided that there is adequate scope to the sub-regional processes and adequate coordination between sub-regions. We expect sub-regions to coordinate as necessary to share data, information and assumptions as necessary to maintain reliability and allow customers to consider resource options that span the sub-regions.” \*

\* FERC Order 890, ¶ 527

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- Frankly, we were surprised and taken aback by the “Inter-Regional Participation White Paper.”
- So surprised that we felt the need to re-calibrate ourselves to the 890 Order and review the criteria for determining planning regions given by FERC in the Order.
- As you can see in the language highlighted in red, the integrated nature of the grid, reliability planning and resources issues should govern the scope of a planning region.
- The TPs were directed to take input from stakeholders in developing the regions. They did not do this.
- If they did, we would have told them that we define a region as an area in which the coordinated utilization of interconnected bulk transmission systems and available capacity on those systems is a necessary condition for the existence of a transparent, liquid and competitive market for energy. \*
- Market based transactions at the SoCo interface and any one of the SERC defined sub-regional participants in the proposed Inter-Regional Planning Process dwarf those between SoCo and the systems identified as sub-regions within the proposed SoCo region.
- The proposed SoCo region does not meet our definition of a “region.”

\* “...power markets have become regional in almost every area of the country. These regional markets provide opportunities for wholesale customers to access competitive sources of supply, rather than relying exclusively on local generation, including resources owned by their local transmission provider.” FERC Order 890, ¶ 524

# Integrated Nature of the Regional Power Grid and Reliability



## About the Region\*

The SERC Reliability Corporation (SERC) is a nonprofit corporation responsible for *promoting and improving the reliability, adequacy, and critical infrastructure of the bulk power supply systems in all or portions of 16 central and southeastern states*. Owners, operators, and users of the bulk power system in these states cover an area of approximately 560,000 square miles and comprise what is known as the SERC Region.

On July 20, 2006, the North American Electric Reliability Corporation (NERC) was certified as the Electric Reliability Organization (ERO) in the United States, pursuant to Section 215 of the Federal Power Act. Included in this certification was a provision for the ERO to delegate authority for the purpose of proposing and enforcing reliability standards in particular regions of the country by entering into delegation agreements with regional entities.

SERC serves as a regional entity with delegated authority from NERC for the purpose of proposing and enforcing reliability standards within the SERC Region. *SERC is divided geographically into five diverse sub-regions that are identified as Entergy, Gateway, Southern, TVA, and VACAR.*

SERC is one of eight regional entities with delegated authority from NERC; the regional entities and all members of NERC work to safeguard the reliability of the bulk power systems throughout North America.

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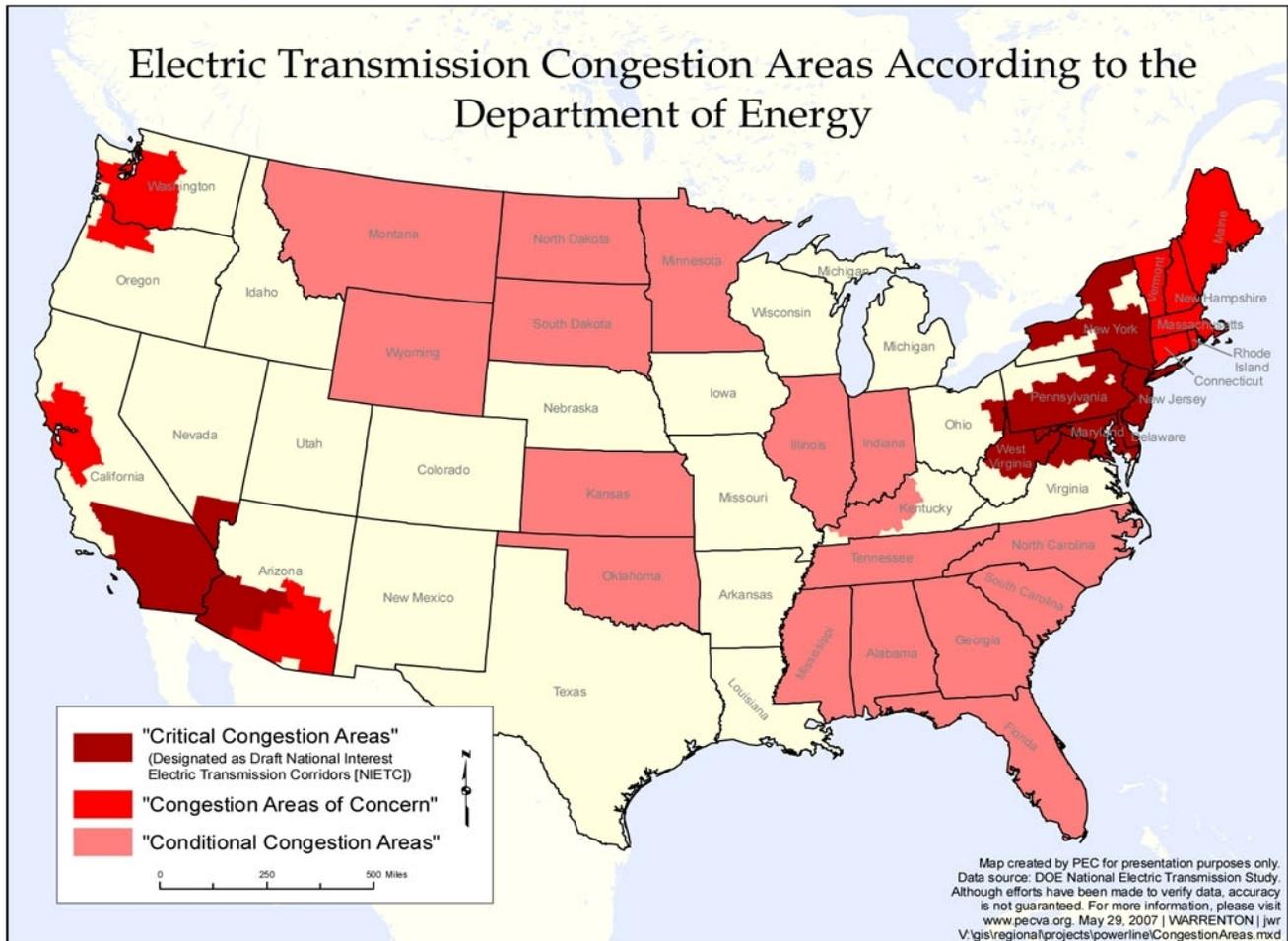
**SERC Reliability Corporation**

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\* SERC Website

- We went to the SERC web-site to look at how they define the reliability planning areas for the SERC footprint.
- As we expected nothing had changed with respect to reliability. However, the TPs that are SERC members and collaborated on the “Inter-Regional Participation White Paper”, have re-defined what are sub-regions for reliability planning, as “regions” for purposes of 890.

# Integrated Nature of the Regional Power Grid and Resources



- We then went to the U.S. Department of Energy's, National Electric Transmission Congestion Study of August 2006 to review their opinion of the integrated nature of the power grid in the southeast as well as the reliability and resource issues affecting individual regions and sub-regions.
- As you can see from this map the southeast has been deemed a Conditional Congestion Area by the DOE.

## Integrated Nature of the Regional Power Grid and Resources cont'd

Conditional Congestion Areas:	Locations
<p>"These are areas where significant congestion would result if large amounts of new generation resources were to be developed without simultaneous development of associated transmission capacity. These areas are shown in Figure 5-5, and they are known to be of considerable interest for possible development of wind, nuclear, or coal-fired generation to serve distant load centers. Timely development of integrated generation and transmission projects in these areas will occur only if states, regional organizations, Federal agencies, and companies collaborate to bring these facilities into existence." *</p>	<ul style="list-style-type: none"><li>• Montana-Wyoming (coal and wind)</li><li>• Dakotas-Minnesota (wind)</li><li>• Kansas-Oklahoma (wind)</li><li>• Illinois, Indiana and Upper Appalachia (coal)</li><li>• The Southeast (nuclear and natural gas)</li></ul>

\* U.S. Department of Energy, National Electric Transmission Congestion Study, August 2006, p 40.

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- As you can see from this table the DOE has identified the SERC region of the as well as the adjoining RFC region as potential congestion areas.
- The concern for the southeast is the planned nuclear capacity as well as natural gas fired capacity. This will be illustrated in subsequent slides.
- The concern for the mid-west is coal.

## Southeastern Conditional Constraint Area

“There is growing interest in developing a new generation of nuclear power plants in the Nation as sources of low-cost base-load electricity without air emissions. To date most of the applications for new nuclear power plants involve locations in the southeastern United States. (See Figure 5-11) Any one new nuclear power plant is likely to require interconnection and some system upgrades; *a large regional concentration of new nuclear capacity would require regional or inter-regional transmission planning to determine what new transmission facilities would be required to move large amounts of electricity to potential buyers over a wide geographic area.*” \*

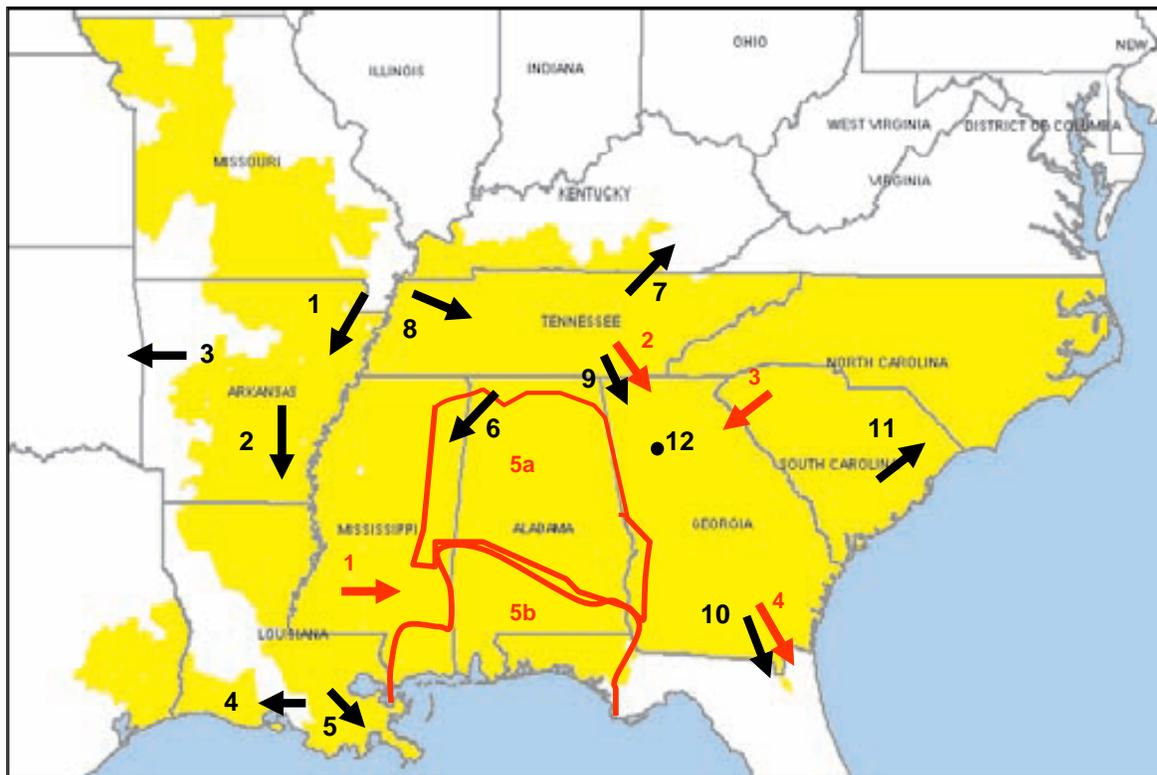
This concern is also applicable to concentrations of new clean coal and natural gas fired generation capacity

\* U.S. Department of Energy, National Electric Transmission Congestion Study, August 2006, p57.

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- This quote from the DOE study clearly states that a large regional concentration of new nuclear capacity would require regional or inter-regional transmission planning to determine what new transmission facilities would be required to move large amounts of electricity to market.
- This concern is also applicable to concentrations of new clean coal and natural gas fired generation capacity.
- DOE’s definition of a region is much more aligned with the Stakeholder’s definition than it is with the definition proposed in the “Inter-Regional Participation White Paper.”

## Intra-Regional Transmission Constraints in the Southeast



U.S. Department of Energy, National Electric Transmission Congestion Study, August 2006, p 24  
 Southern Company Services, "Regional Planning Stakeholders Group 'RPSG', Economic Planning Studies", August 15, 2007

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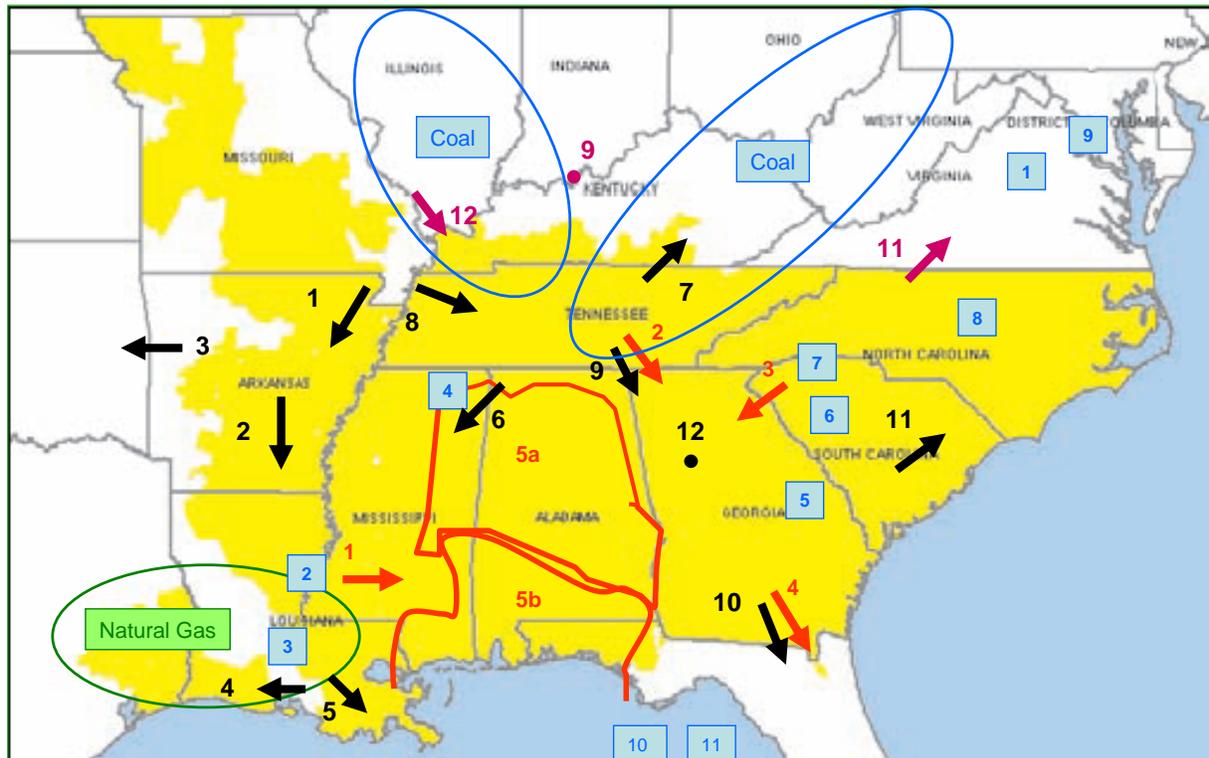
- This slide shows the intra-regional transmission constraints within the SERC region identified by the DOE study. They are in black.

- The slide also shows the transmission congestion that the Regional Planning Stakeholders Groups (RPSG) asked the Southern Company to study late this past winter. These are in red.

1. Entergy to Southern Company
2. TVA to Georgia ITS
3. VACAR to Georgia ITS
4. Georgia ITS to Florida (FRCC)
5. NWW to Georgia ITS

- The numbering convention from the studies has been retained so that you can readily refer back to them if you want.

## Inter and Intra Regional Transmission Constraints in the Southeast and Locations of Proposed New Nuclear, Coal and Gas Capacity in SE US



- U.S. Department of Energy, National Electric Transmission Congestion Study, August 2006, pp 23, 24
- Southern Company Services, "Regional Planning Stakeholders Group 'RPSG', Economic Planning Studies", August 15, 2007
- U.S. Department of Energy, National Electric Transmission Congestion Study, August 2006, pp 50, 58

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- This slide shows the inter and intra-regional transmission constraints within and around the SERC region identified by the DOE study. The additional inter-regional constraint points are in purple.
- The concentrations of planned nuclear and natural gas capacity additions in SERC as well as the planned coal fired capacity additions in the mid-west are also shown.
- Again, the numbering conventions have been kept constant so you can easily refer back to the original studies.
- Clearly their needs to be a significant amount of Regional Planning and Inter-regional coordination in order to identify and build the transmission needed to bring the planned capacity additions behind the congestion points to the load.

## FERC Guidance on Regional and Sub-Regional Planning

"527.... *In very large regions, there may well be both sub-regional and regional processes. For example, in the West there are various sub-regional processes in addition to a WECC regional planning process.* We believe that such an approach can work, provided that there is adequate scope to the sub-regional processes and adequate coordination between sub-regions. We expect sub-regions to coordinate as necessary to share data, information and assumptions as necessary to *maintain reliability and allow customers to consider resource options that span the sub-regions.*"

" 7. *Regional Participation (P 523-528)*

The *regional participation principle provides that, in addition to preparing a system plan for its own control area on an open and nondiscriminatory basis, each transmission provider is required to coordinate with interconnected systems* to (i) share system plans to ensure that they are simultaneously feasible and otherwise use consistent assumptions and data and (ii) identify system enhancements that could relieve congestion or integrate new resources. The Commission stated that the specific features of the regional planning effort should take account of and accommodate, where appropriate, existing institutions, as well as physical characteristics of the region and historical practices.....

... In drafting their Attachment K, Staff recommends that transmission providers address the following issues:

*Identify the entities with which the transmission provider engages in regional planning and the responsibilities of each entity in the planning process.*

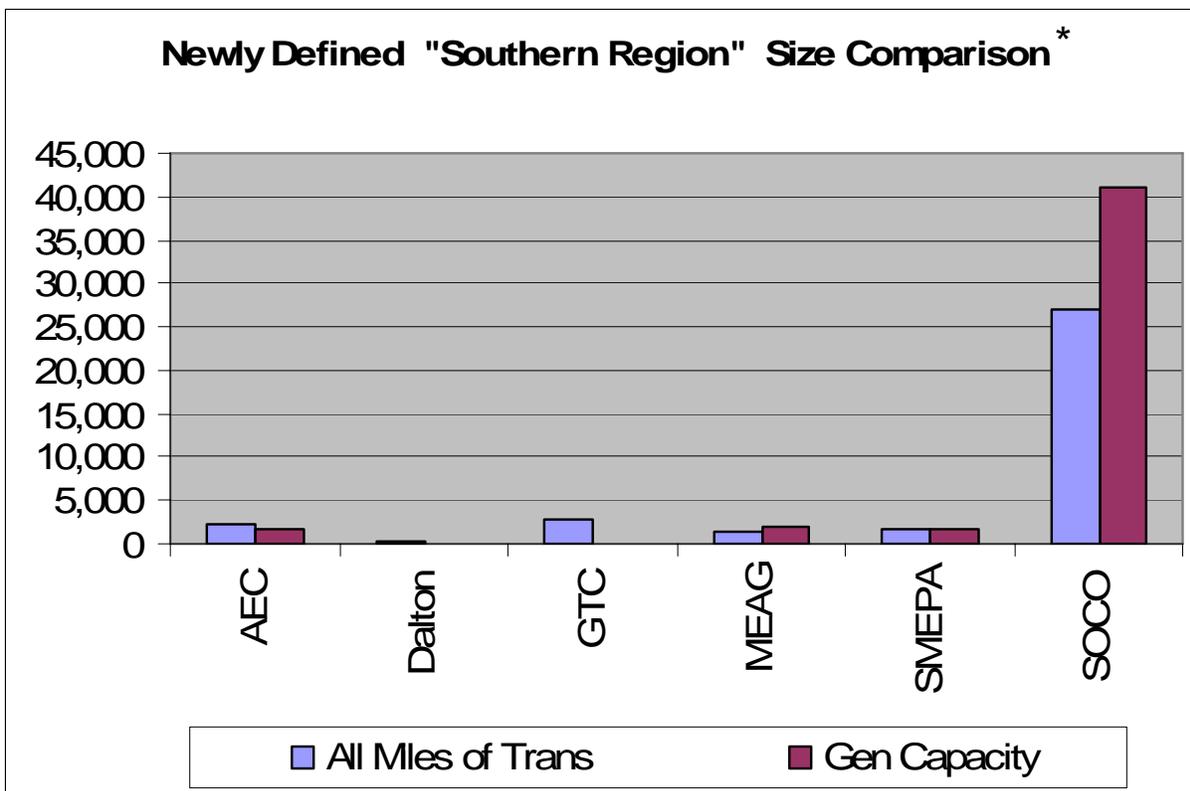
*Transmission providers should identify the interconnected systems with which they will coordinate regional plans.....*"\*\*

\* FERC Order 890, ¶ 527

\*\*Order No. 890 Transmission Planning Process Staff White Paper, August 2, 2007, pp 12-13

- We're OK with having local, sub-regional and regional processes as defined in the Order and FERC White Paper given circumstances that exist like those in the WECC.
- We believe, however, that FERC clearly states in 890 and their White Paper that transmission providers should engage in a regional planning process that meets the standards outlined for Coordination, Openness, Transparency, Information Exchange, Regional Participation and Economic Planning Studies in order to achieve comparability for transmission customers within the Region.
- This regional planning process should allow non-transmission load serving entities the ability to look beyond the generation resources offered to them by the generation affiliates of the TP to which they are mainly, directly interconnected when they plan for their own reliability needs. This is one of the major reasons for 890.
- This requires that TPs engage in more than reliability planning for their own control area.

## It's Business as Usual; System Planning



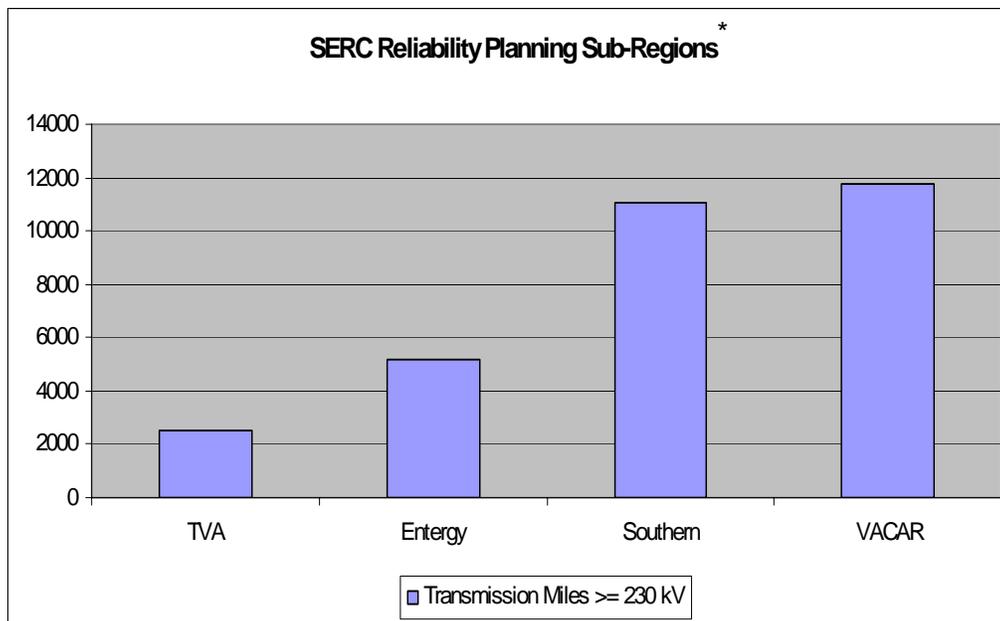
\* Compiled from presentations of sponsors at 2006 Regional Transmission Planning Summit, November 15, 2006 available at [www.weboasis.com/OASIS/SOCO/Misc/2006PlngSummit/SummitOpeningPresentation.pdf](http://www.weboasis.com/OASIS/SOCO/Misc/2006PlngSummit/SummitOpeningPresentation.pdf)

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- What are the peer to peer sub-regions?
- Where are local planning processes applied?
- Who is making a market at all these delivery points so I can *“access competitive sources of supply, rather than relying exclusively on local generation, including resources owned by their [my] local transmission provider?”* \*
- It's equivalent to scheduling football games between the Atlanta Falcons and local high school football teams and claiming you've created a new NFL Division.
- The shear difference in scale between the Southern Company and the other small TPs in this newly defined “region” will only facilitate business as usual and not implementation of the 890 Principals within SERC.
- Three of the requested studies were between the GA ITS and other historically termed SERC sub-regions as well as NERC region, FRCC.
- Only one of the requested studies from the RPSG was for congestion between SoCo and another member of this proposed “region” – GA ITS . Behind this constraint is islanding in the NWQ due to stability limits. Shorter term solutions to this issue should possibly be addressed in the normal course of reliability planning, or in a customer requested System Impact Study as per ¶ 978 of Order 890.

\* FERC Order 890, ¶ 524

## Peer Planning Sub-Regions within SERC



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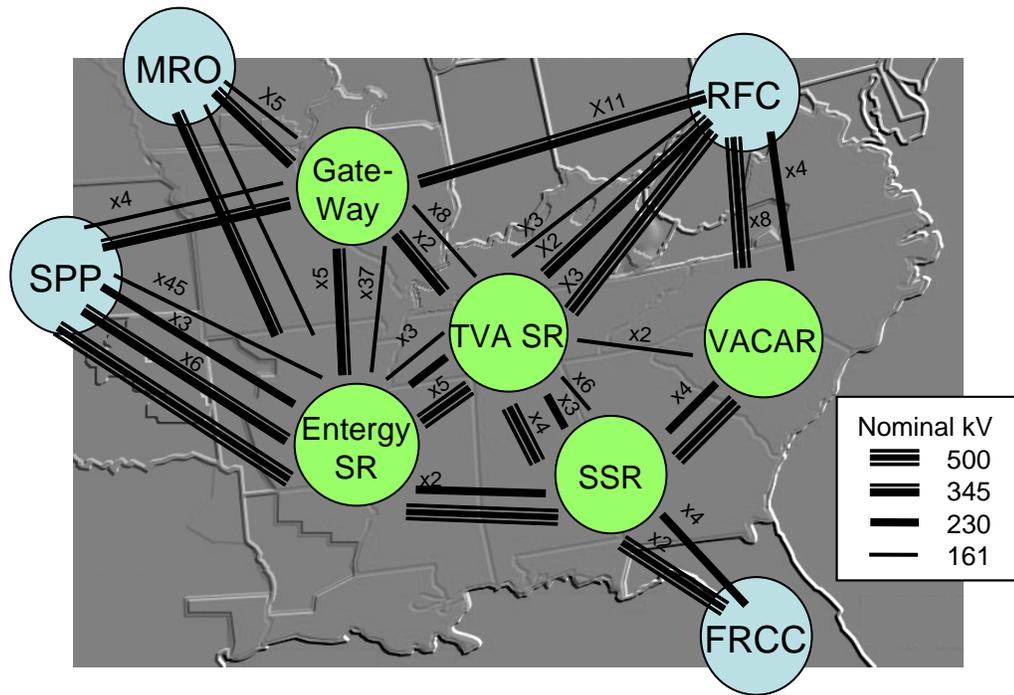
\* Southeastern Infrastructure Assessment, Southeastern Association of Regulatory Commissioners, May 8, 2002, p 12

- This data is a little stale but a spot check of some of the numbers showed they haven't changed that much.
- The large scale transmission providers within SERC are shown here. This is the sub-regional peer group that needs to coordinate as necessary to share data, information and assumptions as necessary to *"maintain reliability and allow customers to consider resource options that span the sub-regions."* \*
- Their coordination activities, processes and procedures need to meet the standards for all the Principals of 890 and not just the loose guidelines for inter-regional planning in the FERC White Paper.
- The term "inter-regional" is not used at all in the Commission Determinations on the 9 Planning Principals in Order 890 and only five times, on pages 14 and 15, in the FERC Planning White Paper.

\* FERC Order 890, ¶ 527



***SERC Inter- and Intra-Regional Interconnections*** \*



**SERC Reliability Corporation**

\* "SERC INFORMATION SUMMARY", July 2007, p 17

- We've come full circle here. Again referencing documents from the organization in which the TPs that collaborated on the "Inter-Regional Participation White Paper" are members for the purpose of planning and coordinating for transmission reliability within the southeast.
- This organization titled this map as "SERC Inter- and Intra- Regional Interconnections"
- Clearly the large TPs that participated in the drafting of the "Inter-Regional Participation White Paper" are sub-regions when it comes to planning for reliability in the southeast as well as within the context of ¶ 524 of Order 890.

## Promotion of Sub Regions to Regions Creates Safe Harbor from 9 Principals

Inter-Regional Participation White Paper	FERC Guidance Re: Regional Planning
<p>"The Inter-Regional Participation Process will be conducted over a two year cycle."</p>	<p><u>Order 890</u> 494. ....develop a <b>transmission system plan</b> that (1) meets the specific service requests of its transmission customers and (2) <b>otherwise treats similarly-situated customers (e.g., network and retail native load) comparably in transmission system planning.</b></p>
<p>"These Economic Planning Studies <b>shall be confined to sensitivity requests for bulk power transfers.</b> In addition, these Economic Planning Studies shall also be <b>for a future year that is at least five years or more from the then-current year,</b> based upon the assumption that the upgrades necessary to accommodate such bulk power transfers would require at least five years to construct."</p>	<p><u>White Paper</u> Transparency; Pg 7. Staff recommends identifying in Attachment K the frequency of transmission plans and the planning study horizons used. <b>Study periods should be consistent with those used to plan the system for native load customers</b></p>
<p>" The purpose of these training and interactive sessions is to facilitate Stakeholders' ability <b>to produce similar transmission</b> planning study results to those of the Transmission Provider"</p>	<p><u>Order 890</u> 471 This information should enable customers, other stakeholders, or an independent third party to <b>replicate the results of planning studies</b> and thereby reduce the incidence of after-the-fact disputes regarding whether planning has been conducted in an unduly discriminatory fashion.</p>
<p>"Study results that are inter-regional in nature will be reported to the RPSG and interested Stakeholders and posted as they become available from the Inter-Regional Participation Process."</p>	<p><u>White Paper</u> Coordination; Pg 4. Describe the frequency of meetings to be held and other planning-related communications.... ...Staff recommends that <b>the schedule for such meetings, or other planning-related communication, provide an opportunity for input regarding:</b> •data gathering and customer input into study development; •<b>review of study results;</b> •review of draft transmission plans; and •coordination of draft plans with those of neighboring transmission providers.</p>

- This is not a matter of semantics. It has real consequences for transmission customers in the southeast.
- Again, the guidance in Order 890 and the FERC White Paper is directed towards Regional Participation, not Inter-Regional Coordination.
- There are many glaring variations from the FERC guidance on the 9 Principals in the "Inter-Regional Participation White Paper". Some are listed in this slide.
- Under the proposed planning process, non-transmission owning LSEs and their potential non-TP affiliated energy suppliers will be a year behind planning for their reliability needs, relative to the generation affiliates of the TPs.
- Not only are these non TP affiliated LSEs a year behind in planning for a least cost portfolio of generation and transmission services to meet their reliability needs but they are not afforded the same planning horizon.
- In addition study requests are limited to bulk power transfers as well as having no set schedule for releasing study results.
- How does this achieve "**comparability in planning between that conducted for a transmission provider's retail native load and its similarly-situated transmission customers?**" \*
- There is also the potential for continued discrimination in favor of the TPs' affiliated generation companies as critical information will be made available to them a year earlier than the TPs' customers.

\* FERC Order 890, ¶ 502

## We're Moving Backwards!

- Inter-Regional Participation White Paper

“The Inter-Regional Participation Process will be conducted over a two year cycle.”

- Recent RPSG Planning Cycle

March 7<sup>th</sup>, 2007 RPSG selected 5 congestion points to study.

1. Entergy to Southern Company
2. TVA to Georgia ITS
3. VACAR to Georgia ITS
4. Georgia ITS to Florida (FRCC)
5. NWQ to Georgia ITS

April 6<sup>th</sup>, 2007 TPs responded with Draft of Sensitivity Assumptions for review

August 15<sup>th</sup>, 2007 TPs responded with Potential Solutions

- Three of these studies would be deemed inter-regional and one would be deemed “external” if the new regional definitions are accepted.
- What took less than 6 months would now take two years for three congestion points and an indeterminate time for another as there are no specified time frames for “external” studies.

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- Current regional planning participants are worse off under the procedures outlined in the “Inter-Regional Participation White Paper” for the reasons outlined here.

Current Cost Allocation Models for Reliability Benefits are Limited to TP's Own Projects

**A Regional Reliability Project on system of two TPs solves reliability issue for both TPs\***

(1) Transmission Provider	(2) Total Project Cost to Meet Reliability Needs on a Stand Alone Basis (MM)	(3) Cost of Regional Reliability Project (MM)	(4) Avoided Stand alone Transmission Project Cost (MM)	(5) Project Costs to Meet Reliability Needs on a Regional Basis (MM) <b>(2) + (3) - (4)</b>	(6) TP True Up	(7) Final Cost Responsibility (MM)
Company A	\$500	\$25	\$30	\$495	\$2	\$497.00
Company B	\$400	\$20	\$20	\$400	(\$2)	\$398.00
Total	\$900	\$45	\$50	\$895	\$0	\$895.00
<b>(7) Final Cost Responsibility (MM)</b>		<b>(2) - 4 + [(4) / Sum (4)] * SUM (3) or;</b>				
		Your cost, minus your avoided cost plus your percentage of total avoided costs, times the total costs of regional reliability projects				

\* Adapted from North Carolina Transmission Planning Collaborative, TAG Meeting, 9/17/07, p 34.

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- To date, all illustrations of cost allocation methods have been limited to reliability projects shared among TPs. This slide is adapted from the North Carolina Transmission Planning Collaborative's cost allocation methodologies.

- The process shown is pretty straightforward. If a shared transmission project can produce the same level of reliability, at a lower total cost, than projects included in each individual TP's plan it will be constructed.

- Each TP will avoid costs embedded in their own plans, share the construction cost of the joint project and financially true up the difference between their costs in the joint project and their received benefit.

- The benefit to the TPs' customers is that the overall transmission costs to them are reduced by \$5 MM, or the difference between the total costs of the individual projects avoided and the cost of the joint project.

Promotion of Sub Regions Pre-empts Equitable Cost Allocation for Economic Projects

<b>Economic Transmission Project Contributes to Regional Reliability</b>						
(1) Transmission Provider	(2) Total Project Cost to Meet Reliability Needs on a Stand Alone Basis (MM)	(3) Cost of Regional Reliability Project (MM)	(4) Avoided Stand alone Transmission Project Cost (MM)	(5) Project Costs to Meet Reliability Needs on a Regional Basis (MM) <b>(2) - (4)</b>	(6) TP True Up	(7) Final Cost Responsibility (MM)
Duke	\$500.0	<del>\$25.0</del>	\$30.0	\$470.0	\$24.0	\$494.0
Progress	\$400.0	<del>\$15.0</del>	\$20.0	\$380.0	\$16.0	\$396.0
<b>Total Reliability</b>	\$900.0	<del>\$45.0</del>	\$50.0	\$850.0	<b>\$40.0</b>	\$890.0
Economic Project	\$300.0				<b>-\$40.0</b>	\$260.0
<b>Total</b>	\$1,200.0				\$0.0	\$1,150.0
<b>(7) Final Cost Responsibility (MM):</b>						
<b>TPs</b>	(2) - 4 + [(4) / Sum(4)] * ( lesser of total of reliability projects or reliability component of economic upgrade) or;					
	Your cost, minus your avoided cost plus your percentage of total avoided costs, times least cost of reliability.					
<b>Economic Project</b>	(2) - (6) or;					
	Project Cost minus Payment from TPs					

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•This slide illustrates an example of how the reliability component of an economic project can be included in reliability plans for TPs and how cost allocation across economic and reliability projects can benefit customers of both non-transmission planning LSEs and TPs.

•In this example a economic project is substituted for the \$45 MM joint reliability project from the previous slide and given a \$40 MM credit. The TPs' customers benefit an additional \$5 MM from the earlier example and the economic project costs \$40 MM less.

•Unfortunately, promotion of sub regions to regions pre-empts equitable cost allocation for economic projects for a variety of reasons.

•First. All language in the FERC Order and White Paper refers to cost allocation for regional, not inter-regional projects.

•Second. The one year difference between the TPs' own reliability planning studies and the studies conducted under the process outlined in the "Inter-Regional Participation White Paper" significantly impedes the ability to include the economic study results in the solution set for the TPs' individual, or joint, reliability planning.

•This delay combined with the different planning horizons and limitations to studying only bulk power transfers will mean that the customers on non-transmission owning LSEs will be on a one way street when it comes to cost allocation.

•While the "Inter-Regional Participation White Paper" gives mention to cost allocation between reliability and economic transmission projects there is virtually no explanation of how this would happen. Nothing comes close to providing the "*ex ante certainty regarding cost allocation*" required by FERC in page 18 of their White Paper

Rationale for Regional Definitions in “Inter-Regional Participation White Paper”?

FERC White Paper

Regional Participation, p14

“Describe any *inter-regional planning* activities in which the transmission provider or regional entity participates.

Staff encourages parties to identify planning activities that can be performed on an inter-regional basis. Among other things, inter-regional coordination should strive for consistency in planning data and assumptions and address system enhancements that could relieve transmission congestion across multiple regions could be identified. For example, *long-range studies can be used to identify multi-state backbone projects to enhance reliability and address shifting load and generation patterns.*”

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- I searched Order 890 and the FERC White Paper for any language that would support redefining the SERC sub-regions as regions for purposes of compliance with the Order.
- The only language I could find that *might* be used as a rationale was this language from the White Paper on Regional Participation.
- By the way, this paragraph contains three of the five uses of the term “inter-regional” in the FERC White Paper
- However, I argue that if is used used to support the redefinition it’s based upon faulty logic.

## Incorrect Inference?

Inference: is the act or process of deriving a conclusion based solely on what one already knows.

Known: *All cows are animals*

Correct inference: *Some animals are cows*

Incorrect inference: *All animals are cows*

Even if all “inter-regional projects” are “multi-state backbone transmission projects”

Caveats; Generation Siting, Re-Dispatch, Demand Resources

Not all “multi-state backbone projects” are “inter-regional projects”

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- This faulty logic is termed an incorrect inference.

## Need to See Transmittal Letter Accompanying Schedule K

“Staff therefore recommends that each transmission provider describe, as part of the *transmittal letter* to its compliance filing:

- The *forms of subregional or regional planning that occur today* in the transmission provider's region;
- The *modifications or improvements* to such processes that are being proposed as part of compliance with Order No. 890;
- *The reasons why a particular subregion or region was chosen to address compliance with Principle No. 7;*
- The process by which the proposed subregional or regional planning processes can evolve over time as stakeholders gain experience with them..”\*

\*Order No. 890 Transmission Planning Process Staff White Paper, August 2, 2007 p15

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- I guess we'll need to wait for the Transmittal Letter that will accompany the TPs' Schedule Ks for a reason, since none has been given so far.
- They will have to explain the major modifications to the current SERC definitions of sub-regions used for reliability planning as well as why they've decided to use what are largely single or dual system control areas for regional planning.
- I also take the point of view that they will have to explain the major changes in between the current processes in place for conducting RSPG studies and those outlined in the “Inter-Regional Participation White Paper”

## Need Further Clarification From FERC

- Are Southern Company, Entergy, VACAR, TVA, etc. considered individual Regions under 890?
- Is the SERC footprint a Region under 890 as it is for Reliability Planning?
- Do the proposed Inter-Regional Planning Processes have to adhere to the nine Principals of 890?
- Do the proposed External Planning Processes have to adhere to the nine Principals of 890?
- Are Economic Planning Studies limited to those for Bulk Power Transfers?