

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Puget Sound Energy, Inc.	Docket Nos.	ER19-2760-000
NorthWestern Corporation		ER19-2762-000
PacifiCorp		ER19-2763-000
Avista Corporation		ER19-2764-000
MATL LLP		ER19-2765-000
Idaho Power Company		ER19-2766-000
Portland General Electric Company		ER19-2768-000

NOTICE OF CONFERENCE CALL

(November 18, 2019)

On Monday, November 25, 2019, Commission staff will hold a conference call with the captioned parties (Enrolled Parties) beginning at 2:00 pm (Eastern Time). The purpose of the conference call is to further explore the Enrolled Parties' proposed revisions to their respective Open Access Transmission Tariff Attachment Ks, which are intended to create a new transmission planning region called NorthernGrid. Please be advised that the questions listed in the Appendix to this notice, as well as possible follow-up questions, will be discussed during the conference call.

All interested parties are invited to listen by phone. The conference call will not be webcasted or transcribed. However, an audio listen-only line will be provided. Those wishing to access the listen-only line must email Gie-Hae Choi at Gie-Hae.Choi@ferc.gov by 5:00 pm (Eastern Time) on Thursday, November 21, 2019, with your name, email, and phone number, in order to receive the call-in information before the conference call. Please use the following text for the subject line, "ER19-2760-000 listen-only line registration."

Commission conferences are accessible under section 508 of the Rehabilitation Act of 1973. For accessibility accommodations, please send an email to accessibility@ferc.gov or call toll free 1 (866) 208-3372 (voice) or (202) 208-1659 (TTY), or send a FAX to (202) 208-2106 with the required accommodations.

For additional information, please contact Gie-Hae Choi by phone at (202) 502-8013 or by email at Gie-Hae.Choi@ferc.gov.

Kimberly D. Bose,  
Secretary.

## APPENDIX

### 1. Submittal Window Timeframe

- a. Under the proposed NorthernGrid regional transmission planning process, other than the Submittal Window in the first quarter of the planning cycle,<sup>1</sup> please explain whether stakeholders and nonincumbent transmission developers have an opportunity to submit transmission project proposals in response to the Enrolled Party Needs that are identified and evaluated in the second quarter Study Scope phase.
  - i. If not, explain why, under the proposed process, transmission project proposals are submitted before regional transmission needs are identified in the process.
  - ii. To the extent Enrolled Parties believe that this proposal is consistent with Commission-approved Order No. 1000 regional transmission planning constructs in other transmission planning regions, please identify those regions and the Commission orders approving those constructs.
- b. In their answer, the Enrolled Parties state, “[u]nder the NorthernGrid planning process, [p]otential project sponsors have access to information about the Enrolled Parties’ transmission needs.”<sup>2</sup> Please elaborate on what specific information potential project sponsors will have access to regarding the Enrolled Party Needs that project sponsors must identify and include in any transmission project proposal they submit during the first quarter of the transmission planning cycle. At what point in the transmission planning process will potential project sponsors have access to this information?
- c. In their answer, the Enrolled Parties state that potential project developers could obtain information from Enrolled Parties’ local transmission planning processes and prior regional transmission plans.<sup>3</sup> To what extent do Enrolled Parties believe that this historical information will provide potential project sponsors with current, accurate information that is sufficient to meet the requirement to identify and include in any project proposal a list of the Enrolled Party Needs that a proposed transmission project will address?
- d. Please explain whether the proposed NorthernGrid regional transmission planning process can identify regional transmission needs that are not

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<sup>1</sup> See, e.g., Proposed PacifiCorp Attachment K, § 5.2.

<sup>2</sup> Enrolled Parties Answer at 7.

<sup>3</sup> Enrolled Parties Answer at 7-8.

already identified in the local transmission planning processes. Please answer this separately for regional transmission needs driven by public policy requirements, reliability, or economic considerations. Explain whether this is different than the existing regional transmission planning process conducted by either ColumbiaGrid or Northern Tier Transmission Group (NTTG).

## 2. Website Posting

- a. It appears Idaho Power Company (Idaho Power), NorthWestern Corporation (NorthWestern), and Portland General Electric Company (Portland General) propose to delete from their existing, Commission-approved local transmission planning processes language that requires each of them to post on their websites explanations of how transmission needs driven by public policy requirements introduced by stakeholders in their local transmission planning processes were considered during the identification stage and why they were not selected for further evaluation. For example, the Proposed Idaho Power Local Planning Process, section 3.2.1 currently states that “Transmission Provider will post on its OASIS website the an explanation of transmission needs driven by Public Policy Requirements that will be evaluated for potential solutions in the biennial transmission planning process and an explanation of why other suggested transmission needs driven by public policy will not be evaluated” but Idaho Power proposes to remove “and an explanation of why other suggested transmission needs driven by public policy will not be evaluated.” Are these public utility transmission providers proposing to no longer post this information? If so, what is the basis for this proposal?
  - b. Alternatively, if language on posting the aforementioned explanations is located elsewhere in the proposed Attachment Ks, please provide those section references.
- ## 3. Determination of a Project for Inclusion in the Draft Regional Transmission Plan
- a. Explain whether the Cost Allocation Task Force determines which of the Eligible Cost Allocation Projects will be included in the Draft Regional Transmission Plan as Cost Allocation Projects.
  - b. Explain the methodology and criteria that will be used to determine which of the Eligible Cost Allocation Projects are chosen.

## 4. Stakeholder Participation

- a. Please explain why the current proposal excludes stakeholder participation in the initial review of the development of the Study Scope, Draft Regional Transmission Plan, and Draft Final Transmission Plan.<sup>4</sup>
    - i. Will the comments provided by the Enrolled Parties and States Committee to the Enrolled Parties Planning Committee regarding subsequent modifications either be available to stakeholders for review or be subsequently disclosed to stakeholders? If not, please explain why not.
    - ii. When the Enrolled Parties Planning Committee schedules a public meeting to review the draft Study Scope, Draft Regional Transmission Plan, and Draft Final Transmission Plan, and to solicit comments from stakeholders, will these draft documents include the comments and revisions made in the initial review by the Enrolled Parties and States Committee to the Enrolled Parties Planning Committee? If not, please explain why not.
  - b. Please explain why the Cost Allocation Task Force charter does not allow stakeholders to attend meetings.<sup>5</sup>
5. Time Horizons of the Cost and Benefit Calculations
- a. In calculating the benefit-to-cost ratio, Enrolled Parties propose to consider the total cost of a project, but will only consider the benefits of a project gained during the 10-year regional planning horizon.<sup>6</sup> To what extent do Enrolled Parties believe that this asymmetry between the time period to measure the estimated costs and benefits of a potential regional solution will not result in excluding transmission projects with positive net benefits from being eligible to be selected in the Final Regional Transmission Plan for purposes of cost allocation?

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<sup>4</sup> *See, e.g.*, Proposed PacifiCorp Attachment K, § 6.2 (Review and Comment; Consideration of Comments; Update Study Scope); § 6.4 (Review and Comment; Consideration of Comments; Update Draft Regional Transmission Plan); § 9.2 (Review and Comment; Consideration of Comments; Update Draft Final Regional Transmission Plan; Regional Transmission Plan).

<sup>5</sup> Exhibit A Cost Allocation Task Force Charter; Exhibit B Enrolled Parties Planning Committee Charter, Art. 2.3 (Stakeholder Participation; Eligibility to Vote); Exhibit C Enrolled Parties and States Committee Charter, Art. 2.3 (Stakeholder Participation).

<sup>6</sup> *See, e.g.*, Proposed PacifiCorp Attachment K, §§ 8.2, 8.4, and 8.5.2.

(continued ...)

- b. Please explain how this proposal is consistent with Commission precedent ensuring “that all of the benefits and all of the costs of proposed [] projects [be] calculated over the same time horizon.”<sup>7</sup>
6. Additional Information Requests to Developers
  - a. The proposed Attachment Ks provide that if the Enrolled Parties Planning Committee determines that additional information is necessary or appropriate for a proposed solution, it may request additional information at any time and the Project Sponsor must promptly provide such information. Please answer the following questions.
    - i. What types of information could be needed that are not included in Table A?<sup>8</sup>
    - ii. How much time will a stakeholder, such as a Project Sponsor, have to provide this additional information?
    - iii. Will the Enrolled Parties Planning Committee continue with the assessment if the stakeholder is unable to provide the additional information, or if the Enrolled Parties Planning Committee determines the additional information is insufficient?
7. Definitions Missing in the Attachment Ks
  - a. Please explain why certain definitions are not included in various Enrolled Parties’ Attachment K section 1. For example, Puget Sound Energy, Inc., NorthWestern, and MATL LLP do not include definitions for Demand Response (§ 1.2) and LTP Study Request (§ 1.4)).
  - b. Please explain why Idaho Power and Portland General have definitions for Demand Response, but do not define LTP Study Request, while Portland General does not define Merchant Transmission Project (§ 1.4.1).
8. Public Policy Requirements
  - a. Please elaborate how transmission needs driven by Public Policy Requirements will be evaluated pursuant to the Development of Draft Regional Transmission Plan section.<sup>9</sup>

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<sup>7</sup> *Tampa Elec. Co.*, 148 FERC ¶ 61,172, at P 305 (2014).

<sup>8</sup> *See, e.g.*, Proposed PacifiCorp Attachment K, § 5.2.3.5.

<sup>9</sup> *See, e.g.*, Proposed PacifiCorp Attachment K, § 6.