November 8 EIPC Response to RUWG Questions

RUWG Comments to EIPC October 14, 2010 [as of October 19, 2010]

RUWG has reviewed the September 24, 2010 draft of the 2020 Roll-Up Model Report and have the following comments for incorporation in the next issue of the Report. We have also listed questions that were asked during the October 4 Webinar to which we request formal answers.

RUWG's intent is to understand the 2020 Roll-Up Model and not to change the integration of the regional plans described as Task 2 in the Statement of Project Objectives.

Information requested in the 2020 Roll-Up Model Report

1. The process followed by each Planning Authority for identifying and approving transmission and generation projects. If there is more than one process within a Planning Authority, then these should be detailed also. The description should include the agencies and jurisdictions that have a role in the processes.

This question is addressed in Section 2.5 and 2.7 of the revised report

2. The status of each project within the above processes. RUWG is open to a discussion of only including "major" projects with agreement on the definition of "major". [from Wil Burns] Definitions should be provided for all terminology used to describe project status.

This question is addressed in Section 2.5 and 2.7 of the revised report and also in the revised tables of Appendices B and C.

3. Indicate Approval Status of the project separately from project status (has the transmission line or generation project received approvals from PA, State IRP process, State, EPA, or Other Approval?). What approval was received? RUWG is open to a discussion of only including "larger" projects with agreement on the definition of "larger". [from Wil Burns]

This question is addressed in Section 2.5 and 2.7 of the revised report and also in the revised tables of Appendices B and C.

4. The in-service dates of all "major" larger [from Wil Burns] projects included in the Roll-Up Model. Existing projects as of summer, 2010 should be identified.

Service dates of all major projects have been included for all projects listed in the Appendices. Appendices list only projects that are not yet in service.

5. A list, by year and Planning Authority, of generation retirements.

This is addressed in Section 2.7 by each PA if applicable.

6. The cost of transmission projects at or above 345 kV. --Most of the Control Areas in Zone C (Northeast) of the intended modeling, have VERY little transmission that has anything greater than a 345KV rated facility. I suspect another small Zone is in a similar situation. I would recommend the inclusion of 345KV facilities in the requested answers. --BRUCE Mc Kinnon

This is not available on an EIPC wide basis

7. The source and vintage of load forecasts by Planning Authority. If there is more than one forecast within a Planning Authority, then these should be provided also. If a load forecast is based on an econometric forecast, the vintage of that econometric forecast should be provided also [from Paul Peterson].

This question has been addressed to the extent possible in Section 2.2 of the revised report.

8. The process for rolling up each reporting entity's load forecast to create a coincident peak for the Planning Authority.

This question has been addressed by each PA in Section 2.2 of the revised report.

9. The process for rolling up each Planning Authority's load forecast to create a coincident peak for the Eastern Interconnection.

This question has been addressed in Section 2.2 of the revised report.

10. The amount separate amounts [from Paul Peterson] of Energy Efficiency and Demand Response included in each forecast, by year and treatment (i.e., load reducer or resource). The source of the EE and DSM numbers for each PA (such as market, forecast, state/ regional mandate, other source). And, separately for EE and DSM numbers - how/ if the numbers were used in the plan that was rolled up, whether load reducer or resource or other use. [from Wil Burns]

This question has been addressed in Section 2.3 of the revised report.

11. The status of each reporting entity's compliance with RPS mandates. Describe what was done to comply with RPS mandates. Identify the generation and

transmission added to the PAs' plans for use in the roll-up as a result of RPS mandates.

RPS requirements are generally reflected in mandates applicable to load serving entities. They also are taken into account in new investment decisions by competitive generation providers. The RPS mandate typically requires the LSE to purchase or otherwise utilize a portfolio containing a certain level of renewable generation (with renewable generation defined differently in different states). Planning Authorities have varying approaches to planning transmission to meet RPS requirements. In general, LSEs and generators identify their portfolio needs as a result of RPS and the planners incorporate those needs by incorporating in the transmission plan the upgrades associated with new generation in the interconnection queue.

12. Identify transmission or generation added to or removed from the PAs' plans as a result of other Federal, State or local laws. Describe how or if the generation and transmission included, or the dispatch in each PA were affected, by modeling potential effects of Federal or State laws or policies? Are existing or planned Federal or State laws that may reduce demand or affect dispatch factored into the PA's plans (that were included in the roll-up)? How?

The roll-up is based on current laws and contractual obligations, and is also based on the input of others especially with respect to resources included. The PAs assume that these inputs from others are in accordance with Federal, State, and local laws. The responsibility for ensuring that a project obtains the necessary permits remains with the project developer be it a generation or transmission developer.

13. Identify changes made to the PAs' plans to get the case to solve. What was changed? Identify inconsistencies among plans or assumptions in plans that had to be resolved, and how these were resolved.

No changes to the plans were needed to get the case to solve. The Gap analysis underway seeks to identify any inconsistencies in plans and to identify potential facilities which could resolve those inconsistencies.

14. Please provide the solved roll-up case in electronic format for our experts to analyze if needed.

The case will be made available when finalized and can be obtained consistent with the CEII requirements documented at http://www.eipconline.com/Documents/EIPC_Process_Stakeholder_Access_CEII_Data.p http://www.eipconline.com/Documents/EIPC_Process_Stakeholder_Access_CEII_Data.p

15. A tabular summary of RPS used as need drivers for transmission projects with respect to: use of REC, percent of intra state sourcing, cost caps, firm capacity v annual energy contribution.

The PA's generally do not have this information since it is not used to develop their regional transmission plans. Refer to the response to question 11.

16. The status of proposed and conceptual transmission projects with respect to siting, certification, ROW acquisition, initiation of construction, and probability of completion by their assumed in service dates.

Transmission projects have been re-categorized with respect to State/Budget approval status, and regional process completion or approvals. These status categories are described in Section 2.5 of the report. All future projects have been assigned a status category in Appendix B. Beyond these categorizations, the PAs have no basis to modify these input assumptions for the probability of completion.

17. Any indication as to the inter-regional transfer capability if conceptual and/or proposed projects without firm TO support were omitted?

Projects are included in the regional plans based on established criteria set forth in tariff's and the NERC reliability criteria. As a result, there is not a specific decision point based on the undefined category "T.O. Support.

18. A clarification from the EIPC regarding the aggregation of non-coincident PA or regional models (and modeling assumptions such as load forecasts) versus a coincident power flow model would be helpful.

This issue is addressed in Section 2.2 of the report.

19. Have local transmission upgrades been included to mitigate the impact of generation retirements that could cause transmission constraints?

To the extent that any generation retirements are publically known, they have been incorporated into the plans of the PAs, including any upgrade requirements required to maintain reliable transmission system performance through the 10 year planning horizon. See section 2.7 of the report.

20. Have any of the PA or the responsible Resource Planners considered repowering at plants targeted for retirement either to replace generation capacity or to mitigate transmission constraints? [from Wil Burns]

The PAs do not have this information. Decisions about whether generation capacity should be repowered rather than retired are decisions made by generation owners based on the particular economics of each plant. Such decisions are not made by transmission planners who must ensure that the system is in compliance with NERC standards. Typically, individual states address this issue for bundled utilities who would be reviewing retirement vs. repowering decisions with their state PUCs.