



# FEDERAL ENERGY REGULATORY COMMISSION

July 17, 2008

Commissioner Marc Spitzer

**Docket Nos.** OA08-30-000, OA08-34-000, OA08-47-000, OA08-48-000, OA08-33-000, OA08-38-000, OA08-35-000, OA08-23-000, OA08-55-000, OA08-55-001, OA08-55-002, OA08-28-000, OA08-54-000, OA08-54-001, OA08-54-002, OA08-31-000, OA08-31-001, OA08-56-000, OA08-56-001, OA08-56-002, OA08-40-000, OA08-57-000, OA08-57-001, OA08-57-002, OA08-43-000, OA08-99-000, OA08-99-001, OA08-118-000, NJ08-5-000, OA08-25-000 and OA08-26-000

**Item Nos.** E-1, E-2, E-3 and E-4

## Statement of Commissioner Marc Spitzer on Open Access Transmission Tariff Planning

"One of the core components of Order No. 890 is "Attachment K" of the *pro forma* tariff – the requirement of a coordinated, open and transparent planning process. In these Agenda Items, the Commission continues its evaluation of entities' Attachment K compliance filings.

In Order No. 890, the Commission granted transmission providers the flexibility to develop planning processes that work best for their systems. Consistent with this flexibility, the Attachment K proposals before us demonstrate the variety in the manner in which transmission providers and interested stakeholders conduct the planning process. I continue to support this flexibility; a one-size-fits-all approach is not appropriate for transmission planning.

While transmission providers should be free to structure their planning processes in the way that best suits their needs and those of their customers and other stakeholders, tariff rules must be specific and clear. This is to ensure compliance by transmission providers and put customers on notice of their rights and obligations. The foundation of the planning process is a tariff that provides a sufficient level of detail for customers and other stakeholders to understand how the transmission provider will perform transmission planning and the method by which they may participate in the transmission planning process. While we accept many elements of the various proposals before us today, each proposal is subject to further compliance. Those compliance requirements notwithstanding, the proposals demonstrate the efforts of transmission providers towards an open and inclusive planning process. Accordingly, I support these Orders.

Notably, the batch of Attachment K orders before us today highlights the importance of sub-regional planning efforts. Order No. 890 acknowledged that in very large regions, there may be both sub-regional and regional transmission planning processes. The planning processes conditionally accepted in these orders are examples of how this plays out in the Western Interconnection. In addition to their local transmission planning processes, each transmission provider also coordinates its transmission planning with sub-regional groups. The transmission providers describe a multitude of sub-regional groups, including: the Southwest Area Transmission Planning Group, the Colorado Coordinated Planning Group and the Sierra Coordinated Planning Group of WestConnect, the Northern Tier Transmission Group, the Northwest Transmission Assessment Committee and ColumbiaGrid. Further, each transmission provider coordinates its planning process on a regional basis through membership in WECC and participation in WECC's Transmission Expansion Planning Policy Committee, a regional economic planning process. This of course is in addition to efforts to coordinate with the CAISO, whose transmission planning process we



## STATEMENT

conditionally approved at last month's open meeting.

My experience with transmission planning in Arizona gives me faith that this can be accomplished.

While the transmission providers must supplement their Attachment K filings, I am encouraged by the work to date. Therefore, I am pleased to support the orders.

Finally, I would like to thank staff for their on-going efforts to ensure thorough and consistent compliance with Order No. 890."