

Rockland Electric Company Position Paper

Role of Transmission Owners in the Eastern Interconnection Planning Collaborative (7-02-09)

- The Eastern Interconnection Planning Collaborative (EIPC) is intended to coordinate planning on an inter-connection wide basis using the bottom-up approach. Its steering committee should be comprised of ISO/RTO representatives and transmission owner representatives from each region to ensure appropriate consideration of that particular region's needs.
- While it is important to have the independent regional organizations represented on the steering committee, it is equally important that transmission owners have proper representation on the steering committee.
 - TOs have the responsibility and obligation to maintain reliability and provide energy to customers at just and reasonable rates. As the entities that would carry out the EIPC recommendations, TOs must have the ability to make sure that these obligations are carefully considered as recommendations are developed.
 - TOs must have the ability to confirm that recommendations from the EIPC are compatible with and can be integrated with their local reliability plans.
 - TOs are the entities that will be responsible for addressing identified "gaps" across the wider regions through additional project implementation.
 - The outcome of the EIPC will need to be integrated into regional plans in some manner, and the TOs need to be part of that process to ensure an overall seamless planning effort.
- In partnership with the RTO/ISOs, the TOs will provide valuable guidance in developing and analyzing potential projects that effectively meet broader regional needs with minimal impacts on the local criteria.
 - TOs envision a process where TOs and ISOs/RTOs collaborate together to develop suggested enhancements that can be carried out jointly, and still considers all regional efforts.
 - TOs are required to carry out programs on their local systems under state jurisdiction. Such programs may include energy efficiency, customer-side solar, smart metering, and other investments. Each needs to be properly reflected and accounted for in the EIPC evaluation.
- To ensure balanced TO representation associated with ISO/RTO regions, each ISO/RTO should have a TO member on the steering committee to allow appropriate and necessary representation.
 - A comparable approach needs to be developed for the non-ISO/RTO areas.
 - The TO member representative should be selected by the TOs in the region
- A process should be designed that appropriately documents major positions and minor positions that are raised so that complete information is available for the regions to consider.
 - This information will be important for the FERC to understand, and will allow it to more appropriately evaluate individual regional plans, and understand the results of the EIPC that are or are not included.