Entergy Operating Companies’ Comments on MISO-PJM JOA Sections 9.1, 9.2 and 9.3 modifications proposed for compliance with FERC Order 1000 Interregional Planning Process requirements

Submitted February 27, 2013

9.1 Administration; Committees.
No Comments

9.2 Data and Information Exchange

This section references inputs for powerflow and production models such as “planned generation development” and “planned transmission facilities.” Please elaborate on what is considered “planned” by each party. Is there a specific threshold that will be applied (e.g., generators with signed interconnection agreements, projects approved for construction by each RTO, etc.)?

9.3 Coordinated System Planning.

9.3.1 Single Party Planning.
Each Party shall engage in such transmission planning activities, including expansion plans, system impact studies, and generator interconnection studies, as are necessary to fulfill its obligations under its OATT or as it otherwise shall deem appropriate. Such planning shall conform to applicable reliability requirements of NERC, applicable regional reliability councils, or any successor organizations, and any and all applicable requirements of federal, state, or provincial laws or regulatory authorities. …

Entergy comment:
Should the listing above not include local transmission planning criteria of transmission owners, or is this implied in the highlighted statement?

9.3.3 Analysis of Interconnection Requests.
The current reference to “manuals” in the introductory paragraph of this section is vague. Specification of the type of manual would be beneficial, and, if this does not refer to the Business Practice Manuals of the two RTOs, the paragraph should also indicate whether the “manual” is publically available.

(b) Reference to “the posting” in this section is unclear; is this intended to refer to the request for interconnection service?
Draft as of 02/08/13 – Proposed redlines against currently effective MISO-PJM JOA Section 9.1

(c) The term “results” in this section is unclear; suggest “Following the completion of the study (or analysis).”

(j) Entergy requests definition regarding the periodicity of the presentation of the lists at the IPSAC meetings.

9.3.4 Analysis of Long-Term Firm Transmission Service Requests.

(e) Although this section did not contain any proposed revisions, it indicates that the potentially impacted system has two options for participation in the coordinated study, but only indicates one option, to provide input to the studies to be performed by the Party receiving the request.