

RPPTF Meeting Materials
June 13, 2013
Comments of Randy Rismiller
Illinois ICC

From: Rismiller, Randy [mailto:rrismill@icc.illinois.gov]
Sent: Wednesday, June 12, 2013 1:22 PM
To: Barrett, Fran S.
Cc: Mathias, Richard L.
Subject: RE: RPPTF :Informational Materials

Fran—

Thanks for your quick response. While the State of Illinois does not have money to send me to the RPPTF meetings, I try to listen in on the phone and share your perception that the multi-driver discussions have dragged on a long time. You have a difficult task at which you've done a good job.

Essentially, I have only two points for this week's RPPTF meeting: (1) the description of the status quo on page 4 of the slide deck is incomplete as written because it does not capture the context of the findings made in FERC's March 22 Order. As a consequence, the polling question regarding the status quo will likely produce skewed responses; and (2) voting question 1 regarding "integrating" public policy projects into PJM's planning processes should be rewritten because FERC has ruled in the March 22 Order that public policy is already integrated into PJM's planning process. Both of these points could be tackled through discussion and revision of the description of the status quo on slide 4. If you think it would be helpful, you may share these two points with the RPPTF (and the excerpts from FERC's Order that support them).

I would be happy to discuss these two points with you prior to the RPPTF meeting if you think that would be helpful. I will be in the office from 2:00-5:00 Central Time today. My number is 217-785-4046.

From: barretfs@pjm.com [mailto:barretfs@pjm.com]
Sent: Tuesday, June 11, 2013 1:41 PM
To: Rismiller, Randy
Cc: Hanson, Mark; greg@opsi.us; mathir@pjm.com; herling@pjm.com
Subject: RE: RPPTF :Informational Materials

Randy:

Thank you for reaching out to me. I also thank you for your citations and perspectives regarding the upcoming member vote on the topic of a Multi-Driver Approach (MDA). I wish to begin by assuring you that the RPPTF has been meeting for more than a year with vigorous discussion and debate on the topic of MDA. As you can understand, it is extremely difficult to reduce the breadth of content and context into a short voting instrument. Additionally, I can also assure you that each of the issues below have received repeated discussion and awareness.

With that being said – I'd like to ask two questions of you:

- 1) May I share your points below with the RPPTF Stakeholders?
- 2) Can we (Rich Mathias and I) arrange for a brief call with you in advance of the meeting to ensure we understand each of your points?

As the facilitator for this body – I strive to ensure that every voice and perspective is offered and heard as part of our proceedings. I welcome and encourage your participation in Thursday's meeting and wish to ensure your points are clear to others.

Thank you,

Fran
(610) 666-8888

From: Rismiller, Randy [<mailto:rrismill@icc.illinois.gov>]
Sent: Monday, June 10, 2013 5:20 PM
To: Barrett, Fran S.
Cc: Hanson, Mark; Greg Carmean; Mathias, Richard L.
Subject: RE: RPPTF :Informational Materials

Fran—

The *status quo* slide (slide 4) in the multi-driver deck needs further discussion and revision. Nothing that is stated on slide 4 is, on its face, false or incorrect (the “one-off” remark in the last bullet comes closest to being incorrect). But what is stated on slide 4 does not capture the extent and context of the *status quo*. The *status quo* was extensively described in FERC's March 22 Order in Dkt. No. ER13-198 (142 FERC 61,214). Following are some excerpts from that Order that describe the *status quo*. I recommend that you incorporate the content of these excerpts into your description of the *status quo* on slide 4 and attach them in an Appendix. To do otherwise would be misleading by omission.

- Paragraph 111: “By incorporating public policy requirements and initiatives at the assumptions stage of the RTEP process and as part of its enhancement and expansion studies, PJM considers how public policy requirements and initiatives contribute to transmission system needs. PJM, along with the TEAC, ISAC, and Subregional RTEP Committees, facilitates assumptions meetings, during which PJM develops the assumptions it will use to evaluate and analyze potential enhancements and expansions to the transmission system. Through PJM's sensitivity studies and scenario analyses, the assumptions that PJM and its stakeholders develop yield specific transmission system needs. From this set of transmission system needs, which reflects PJM's consideration of public policy requirements and initiatives, PJM evaluates potential solutions and selects “the optimal reliability and market efficiency projects” for an identified transmission need.”

- Paragraph 119: “We disagree with protestors that argue that PJM must implement a multi-driver approach for compliance with Order No. 1000. Order No. 1000 does not require PJM to implement a distinct planning process or cost allocation method specifically for public policy transmission projects. PJM has integrated consideration of transmission needs driven by public policy requirements into its transmission planning process by incorporating those needs into the sensitivity studies, modeling assumption variations and scenario planning analyses on which PJM relies to identify the need for reliability and economic transmission projects. As discussed above, by considering public policy requirements in developing the transmission enhancement and expansion studies, including in future scenarios, PJM factors transmission needs driven by public policy requirements into the selection of the optimal reliability and market efficiency transmission projects. However, we note that PJM commits to continue to develop a multi-driver approach with its stakeholders, and thus we encourage PJM and its stakeholders to explore future enhancements to improve the regional transmission planning process.
- Paragraph 117: “Finally, Order No. 1000 requires that PJM, in consultation with stakeholders, establish procedures in its OATT to evaluate at the regional level potential transmission solutions to identified transmission needs driven by public policy requirements. These procedures must address the evaluation of transmission facilities stakeholders propose to satisfy an identified transmission need driven by public policy requirements and provide stakeholders an opportunity to provide input during the evaluation of potential transmission solutions to identified transmission needs. We find that PJM complies with this obligation because PJM has a Commission-approved process for evaluating potential transmission solutions, including those proposed by stakeholders, to the transmission needs driven by public policy requirements that result when it performs its studies.
- Paragraph 112: “. . . we find that PJM’s proposal satisfies the requirements of Order No. 1000 with respect to consideration of transmission needs driven by public policy requirements in the regional transmission planning process, because PJM’s proposal obligates it to affirmatively “consider, in the transmission planning process, the effect that public policy requirements may have on local and regional transmission needs.” PJM’s regional transmission planning process provides that PJM shall both identify and evaluate potential enhancements and expansions for the purpose of supporting public policy requirements. In Order No. 1000, we noted the benefits to flexible planning criteria for identifying transmission needs driven by public policy requirements, such as facilitating an inclusive long-term transmission planning process.”
- Paragraph 142: “PJM’s State Agreement Approach supplements, but does not conflict or otherwise replace, PJM’s process to consider transmission needs driven by public policy requirements as required by Order No. 1000 addressed above.”

For the same reason that the description of the *status quo* on slide 4 is incomplete, the multi-driver voting question 1 on slide 5 is also incomplete. Question 1 speaks in terms

of “the integration of public policy projects” within “PJM’s existing regional planning processes.” But, in Paragraph 119 of its March 22 Order, FERC explains that PJM has already “integrated consideration of transmission needs driven by public policy requirements into its transmission planning process.” So, Question 1 is misleading in that it asks members whether they support or oppose something that FERC has found to already exist.

Thanks for the opportunity to comment. I plan to be on the phone for the June 13 RPPTF meeting.

From: Regional Planning Process Task Force [<mailto:PJM-RPPTF@LISTSERV.PJM.COM>] **On Behalf Of** Fran Barrett
Sent: Monday, June 10, 2013 3:04 PM
To: PJM-RPPTF@LISTSERV.PJM.COM
Subject: [PJM-RPPTF] RPPTF :Informational Materials
Importance: High

Dear RPPTF Stakeholders:

Following are several informational points for your awareness. The three topics below outline our agenda for Thursday’s meeting. An agenda (in native format for note taking) and presentation materials will be posted tomorrow.

1) Multi-Driver - On Friday, we shared a PowerPoint deck of proposed voting language regarding our Multi-Driver Approach dialog. This deck is also posted to the RPPTF Website. The presentation outlines i) the three previously “polled” MDA questions, ii) today’s status quo and iii) a draft “poll” question for your review. Kindly review and, if there is any clarification required – please advise me by **4 p.m. on Tuesday, June 11th**. Assuming no major revisions – **we will strive to open a formal vote of eligible PJM members in good standing on Wednesday, June 12 and keep the vote open until Tuesday, June 18th**

2) Order 1000 - Compliance Filing responses. We thank those parties submitting their comments to us. PJM and counsel have been preparing responses in a working document (please see attachment above) to permit your review in advance of the RPPTF. The language in the document is organized into three columns:

- Column 1 - March 22 Order Compliance Requirement
- Column 2 - Suggested Compliance OA/Tariff Changes
- Column 3 - Further Explanation

You will see that some items in Column 2 are marked “Still in Development.” The document may not yet contain all redline OA or OATT text but, rather, provides the reader with the direction, logic and content of the planned PJM responses. I’ve asked the team drafting the working document to plan to release additional versions as more of the work is completed. Therefore, we will periodically mail and post updates. As you review the working document – I welcome your calls or e-mails to identify areas we should focus upon in our next couple RPPTF meetings prior to the filing.

3) Order 1000 - Interregional Planning. This item requires filing on or before July 10th. The PJM Team will provide up-to-the-minute status on issues and actions to complete this work in time for filing.

If you have any questions - please reach out to me. Thank you.

Regards,

Fran
(610) 666-8888