BPGTF Agreement Point #7 and Westar Waiver Discussions

Cost Allocation Working Group (CAWG)
January 24, 2007
MOPC Action Items for BPGTF

Consider Base Plan Upgrade classification for upgrades due to ineffective Transmission Operating Directives (TODs)

- Determine cost to replace all Operating Directives

Consider Base Plan Upgrade status for upgrades meeting NERC TPL-003 Reliability Standards
TODs in the 2006-2016 STEP

Review of 2006-2016 STEP shows that 24 Transmission Operating Directives (TODs) are required to maintain reliability standards in the planning horizon.

Reliability projects amounting to less than $6M of E&C costs are required to address ineffective TODs in 2006-2016 planning horizon.

If SPP were to eliminate all necessary TODs in the 2006-2016 planning horizon, it is estimated that members would require upgrades that amount to $118M of E&C costs.

BPGTF Recommendations on TODs

The BPGTF determined that TODs shall be handled according to eight agreement points:

1. If a Transmission Operating Directive (TOD) is in place and a Transmission Owner (TO) unilaterally withdraws the TOD before the TOD becomes ineffective, any consequences (upgrades) lie with the TO.
2. SPP Staff (transmission planning and tariff administration) to determine when a TOD is ineffective.
3. “TOD Planning Effectiveness Standards” should be developed by SPP Staff and endorsed by the TWG and ORWG.
4. TOD must be on file with the SPP.
BPGTF Recommendations on TODs

Agreement points (continued):

5. If a TOD is “effective”, it will continue to be used in evaluation of TSRs.

6. Upgrades associated with new TSRs associated with DRs that cause a TOD to become ineffective will be classified as Base Plan Upgrades.

7. TODs that are identified to be ineffective using the most current MDWG base case models will not result in Base Plan Upgrades.

8. TODs that are identified to be ineffective using the transaction scenario models based on the most current MDWG base case models (in the Transmission Expansion Planning Process) will result in Base Plan Upgrades.

MOPC Actions

Requested Staff to prepare a white paper to help stakeholders understand the differences between Agreement Points #7 and #8.

Suggested that CAWG review and provide any feedback regarding the BPGTF recommendations, in particular Agreement Point #7.
Background

Waiver requested Oct 13th in accordance with Section III.C.1 under SPP OATT Attachment J

Associated with OASIS Request 1086655 for new 20 year, 225 MW DNR at Spring Creek for Westar NITS

SPP recommending Rose Hill – Sooner 345 kV project to provide service, in lieu of 138 kV rebuilds of several flowgates between Northeast OK and Southeast KS

The 120 day deadline for responding to this waiver request expires Feb 10th
Staff Recommendation & MOPC Actions

Staff Assessment Regarding Waiver:
• Rose Hill – Sooner 345 kV project preferred due to:
  1. regional and long term benefits of project,
  2. increase in wholesale competition, and
  3. need for project to accommodate Red Rock outlet

Staff Recommendation
• MOPC approve SPP staff recommendation to provide full Base Plan funding of Rose Hill – Sooner 345 kV project

MOPC
• Motion to approve Staff Recommendation failed.
• MOPC requested that CAWG review Staff Recommendation on the waiver and provide feedback for MOPC consideration before BOD meeting.

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Jay Caspary
Director, Engineering
501.614.3220
jcaspary@spp.org
CAWG MEETING
Jan. 24, 2007
Hyatt Regency DFW
Dallas, TX
1:00 – 5:00 pm

AGENDA

1. Introductions 1:00 - 1:10

2. Tariff Changes Before the RTWG - overview 1:10 – 1:45
   Discussion Lead by Pam Kozlowski

3. Economic Planning 1:45 – 2:15
   Discussion lead by Jay Caspary

4. Westar Waiver Request 2:15 – 2:45
   Discussion lead by Jay Caspary

5. BPGTF Issue #7 2:45 – 3:00
   Discussion Lead by Jay Caspary

6. 15 minute break 3:00 – 3:15

7. Inter-zonal Cost allocation 3:15 – 3:30
   Recommendations presented by David Kays

8. Additional Feedback 3:30 -4:00
   Alternatives Approaches power point
   Discussions lead by Mike Proctor

9. Insufficient Competitive Resources Check List 4:00 – 4:30
   Discussions lead by Gene Anderson

10. SPC Schedule of Economic Upgrades 4:30 – 5:00
    Discussion lead by Les Dillahunty
Potential Expansion of SPP Transmission

CAWG

January 24, 2007

SPP Transmission Expansion Plan (STEP)

2006 – 2016 Horizon

Comprehensive reliability assessment

$1.4B of projects in study horizon

TWG & MOPC approved unanimously

Focus on project tracking
Economic Planning in STEP

- Screened 41 potential 230 kV+ projects based on 2011 summer models which reflected the reliability projects through the 2006-2016 horizon

- Very conservative analyses

- Incremental assessment of the impact of each project

- Projects included AEP proposed $2 billion 765 kV Overlay, as well as a 500 kV project across Ozarks into NW Arkansas
**STEP Economic Screening Results**

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<th>Benefit / Cost Ratio Percentage</th>
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<td>123.19 SWPS - Battlefield 161 kV</td>
<td>19.05 Sooner - Arcadia 345 kV</td>
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<td>18.14 Flint Creek - Brookline 345 kV</td>
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<td>15.66 Crockett - Cypress 500 kV</td>
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<td>39.82 Mena - Mount Ida 138 kV</td>
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<td>34.64 Brookline - Bullshoals - ISES 345 kV</td>
<td>184.21 Redbud 345/138 XF &amp; Redbud - Harrell 138 kV</td>
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<td>28.53 Fort Smith - NW Texarkana 345 kV</td>
<td>24.63 Clevenger Cove - Omaha 161 kV</td>
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**Conceptual 765 kV Overlay Option**

[Diagram of power grid with various projects marked]
Other Studies

Texas CREZs
Other ERCOT Studies
Ozarks
KETA
MISO/SPP Joint Plan
DOE Congestion Studies for NIETCs
SPP EHV Overlay Study

SPP CREZ Study Overview

Objective – Leverage 2006-2016 STEP and other SPP studies to benefit SPP and ERCOT customers.

SPP has significant existing facilities in best CREZs to collect wind energy and has plans which could deliver it to ERCOT and the Eastern Interconnection in a very cost effective manner and relieve congestion in DFW at the same time.

Plans developed to collect and deliver 1,500 – 4,500 – 9,000 MW of CREZs in SPP.

SPP Draft Report being finalized before filing with the PUCT.

Additional studies required to optimize plan for targeted CREZ development objectives.
CREZ Selection (ILLUSTRATIVE)

Hypothetical CREZ Package to achieve a total of 10,000 MW

Slide from Mike Sloan GCPA Luncheon November 2006
SPP CREZ Study Preliminary Results

SPP preliminary analyses look very promising

- Costs less than 20% of ERCOT Panhandle loop
- Injections into ERCOT projected to reduce congestion by $50M+ per year based on LMPs in SPP vs DFW
- Draft report shared with stakeholders 12/29/06
- Proposing detailed analysis to be completed in mid 2007
- Final plans will depend upon CREZ objectives
- Service across SPP for CREZs must follow our OATT, so need a transmission service request to determine final costs in absence of a special agreement between SPP, ERCOT and other affected parties

SPP 765 kV Supporting 9-10 GW of Texas Wind Development in CREZs 2, 3 & 4
Other ERCOT studies

Hugo II outlet & transmission service
- 400 MW HVDC & Hugo-Valley South 345 kV

SPP/ERCOT Coordinated Planning Study 9/05
- Premise that ERCOT wind outlet constraints may compliment SPP needs for support in SPS South
- Existing SPP system can support 400-600 MW of HVDC ties in Midland, Borden or Motley Counties

Entergy and SPP QPR Options
- 450 – 1,050 MW of HVDC ties for ERCOT QPR
- Costs approach $1B for ERCOT QPR

3+ GW of HVDC Ties to ERCOT? !

Potential for significant benefit of ties between SPP and Entergy to ERCOT
- Coordinated planning and operations
- AC systems provide reliability margin benefits and are self healing too...

Synchronous operations with ERCOT last evaluated in 1999 by the Synchronous Ties Committee in their Feasibility Investigation of AC Interconnection Between ERCOT and SPP/SERC Report to the 76th Texas Legislature.
- $300-350M in costs, but no conclusions...
Ozarks Long Range Study

SPP is facilitating a joint planning assessment for 2026 reliability needs in NW AR and SW MO with the cooperation of affected parties: AECC, AECI, AEP, EMDE, GRDA, Entergy and SWPA.

• Inadequate transmission today
• May need help from DOE and NIETCs
• Potential opportunity to replace/upgrade existing SWPA facilities which created 161 kV backbone over 50 years ago to 500 kV?

500 kV Overlay for the Ozarks

[Map of Arkansas showing 500 kV Overlay]
KETA Study

SPP Staff presenting a formal study proposal to KETA for detailed economic analysis of several 345 kV projects to facilitate wind development in KS and improve grid efficiencies

- Facilitate Governors goal of achieving 20% of KS electricity from wind by 2020
- Study to be funded by KETA
  - Scope approved early February
  - Results provided before June

KETA Study Options
Joint Planning

MISO/SPP Joint Study
- JOA Requirement
- Scope being finalized in 1Q07

Support of DOE Congestion Studies and NIETC designations
- Significant support provided to DOE
- ISO/RTO Council Planning Committee
  - ERAG to improve modeling & studies

SPP EHV Overlay Study

Background

SPP Transmission Expansion Planning process in place and effective in identifying reliability needs, least cost solutions and potential economic upgrades through the 10 year planning horizon

Need to identify long range vision for bulk power transmission network in SPP with input from independent entities with EHV experience

Monies approved for consulting services in 2007 to help with long range planning in SPP Engineering
Request for Proposal

Strawman drafted by Staff in 3rd Quarter 2006

Discussed at TWG meetings

Approved by TWG in November

Issued Dec 1st to dozen A/E firms with news release

4 comprehensive proposals received by Dec 29th deadline

SPP EHV Overlay Contractors

InfraSource®
Technology

PowerWorld Corporation
EHV Overlay Objectives

Create a blueprint for 345, 500, 765 kV or higher overlay needs in and around SPP

- Identify an approach to determine impacts on existing SPP Criteria, e.g., reliability margins

Approach to optimize existing assets in footprint

Recommendations on increased ties or synchronous operations with ERCOT and WECC

Next Steps

News Release issued Jan 16th
Kick-Off meeting in Little Rock Jan 22nd – 23rd
Completion slated for mid-June with interim milestones coordinated with SPP calendars
SPP Staff and contractors will work closely with TWG
Appreciate support of members and stakeholders throughout the assessment
Questions/comments to EHVOverlay@spp.org
Questions/Comments?

Jay Caspary
Director, Engineering
Voice: 501.614.3220
Email: jcaspary@spp.org
OMPA comments (we requested that the record reflect these comments)

OMPA cannot support this waiver request.

- OMPA is fundamentally opposed to the underlying reason for this waiver request, the relocation of the Spring Creek project to the Westar control area. OMPA believes that this relocation is contrary to Westar commitments to FERC. Furthermore, the relocation of Spring Creek to Westar will have serious negative impacts on OMPA's ability to support our Kansas (members).

- OMPA has only had this request for a few days. There is insufficient information available to evaluate whether these upgrades will adequately allow OMPA to support our KPP Cities.
Alternative Approaches to Economic Upgrades in SPP
CAWG Report to SPP RSC
January 29, 2007

Background

• At the October meeting of the SPP RSC the CAWG was directed to develop alternatives to the current policy of participant funding of Economic Upgrades.
• This was in conjunction with the SPP Strategic Planning Committees determination that Economic Upgrades to the transmission system were not getting built under the current policy, and that alternative approaches needed to be considered in order to expand construction of economic transmission in the SPP footprint.
Current Approach to Economic Upgrades

• Currently, SPP transmission planning for economic upgrades considers various proposals on a project by project basis.
• The Economic Modeling and Methods Task Force report details how proposed projects are screened:
  Section 2.2. Screening Analysis: “During the creation of each Plan, SPP Staff will analyze a wide variety of possible transmission upgrades identified by SPP Staff or suggested by market participants. The purpose of the screening analysis is to identify those potential upgrades that are most likely to produce positive benefits and which, therefore, will be subject to more detailed analysis as described in this protocol.”
  – This screening analysis is performed using a security constrained dispatch model for summer only and multiplied by two (2) to estimate annual savings that are then compared to the estimated cost of the project.
  – Projects are ranked by the Screening analysis based on the benefit to cost ratio of the projects.
• If an entity requests, SPP will then perform a more complete analysis involving a year-round, security constrained dispatch model to measure multi-year benefits from a candidate project.

Current Approach Continued

• The benefits calculated by SPP from the security constrained dispatch model are then compared to the cost of the project, and the distribution of benefits among the pricing zone generation owners are included in the report.
• With participant funding, the expectation is for those benefiting from a project to come forward and agree to fund upgrades that have proven to be cost beneficial.
  – This includes not only SPP members but also those outside the SPP who benefit from the proposed transmission upgrades.
Alternative 1: Portfolio Approach

- CAWG recommends that instead of SPP transmission planning being done on a project-by-project basis, that SPP develop a PORTFOLIO of economic projects that provides **region-wide benefits** for the entire SPP footprint.
  - Instead of focusing on a single project, the emphasis should be on a set of projects that together provide region-wide benefits.

Reasons for A Portfolio Approach

- A single project will have some load zones serving entities or pricing zones benefiting more than others.
  - Because of the difficulty of accurately estimating the distribution of benefits for various load zones over the life of a project, the allocation of costs for a specific project will become highly contentious.
- A portfolio of projects should be designed to distributes benefits **in a uniform fashion** on a region-wide basis.
  - There will be less contention regarding the distribution of benefits if all load zones are receiving fairly uniform benefits from a portfolio of projects.
Process Is Critical

- A regional planning process with the goal of developing a portfolio of projects that distributes benefits region wide should have a well designed process that allows stakeholders input at each stage.
- SPP should set out the various stages of its planning process, develop products/outputs for each stage, meet with stakeholders to obtain feedback and report back to stakeholders how their feedback was taken into account.
- Seams agreements with respect to determination of benefits and cost allocations for tier 1 entities is a crucial aspect of the process.

Timing Is Crucial

- This regional planning process should begin as soon as reasonably possible.
- The planning process should be completed in a one-year time period.
- A Portfolio of projects should span a multi-year time frame.
  - It is not likely that an entire portfolio of projects can be implemented all at the same time.
  - We suggest that SPP provide a portfolio for implementation approval over at least a 5 7-to-10 year period (i.e., A Five 7-to-10 Year Plan)
  - Each year, the Five 7-to-10 Year Plan can be revised with new or changed circumstances.
Alternative 2: Higher Voltage Emphasis

- The emphasis of the SPP regional planning process should be on the development of Higher Voltage (345 kV or above) projects that are designed to better integrate the power grid within the SPP region and with its neighbors.
- However, a portfolio of economic upgrades will likely include lower voltage upgrades that are needed to deliver and distribute the benefits from these higher voltage projects.

Discussed at 1-24-06 CAWG Meeting

Alternative 3: Benefit Metrics

- The CAWG has reviewed several measures being used by other RTOs for measuring benefits.
  - Currently, the CAWG can recommend the use of what is called Adjusted Production Cost Savings (APCS):  
    - Overall, APCS measures the savings in production cost for the entire SPP footprint, including outside transmission systems directly connected to SPP (1st tier systems), where adjustments to production costs are made for imports into and exports out of SPP.
    - APCS can also be measured for each utility (load-serving entity) as the change in production costs adjusted for changes in off-system purchases or sales of energy.

Discussed at 1-24-06 CAWG Meeting
Development of Other Benefit Metrics is Essential

- Today’s economic upgrades will mitigate future reliability upgrades.
  - It is essential to go beyond the shorter term benefits achieved by APCS in order to determine the long-term ramifications of economic upgrades.
- A more highly integrated power grid may result in lower levels of planning reserves needed to meet a targeted level of resource adequacy as measured by loss of load expectation.
- Increased transmission capability throughout the SPP footprint will likely result in greater levels of wholesale competition and reduce market power concerns.

Sensitivity Analysis is Critical

- Measures of APCS depend heavily on several key driver variables.
  - Fuel Costs
  - Nat’l Renewable Portfolio Standard
  - Carbon Tax
  - Location and MW of New Generation
  - Location and MW of New Load, including demand-side resources.
- It is important in its evaluation of economic upgrades that SPP develop measures of the robustness of the benefits with respect to the key driver variable.
Alternative 4: Cost Allocation

• Cost allocation on a project-by-project basis is a contentious issue.
  – This is because specific projects are not seen as providing region-wide benefits. Thus, any discussion of a region-wide rate, whether it is for 20% (MISO) or 33% (SPP) raises significant concerns that some loads will be allocated more in costs than they can expect to receive in benefits.
  – This is also because dollar estimates of benefits are seen as short term, and allocations of costs are seen as long term.

4A: Severe Congestion

• SPP needs to first identify “severe” congestion that is limiting the proper functioning of the market.
  – The benefits from addressing this type of congestion may make it difficult for SPP to plan a balanced portfolio of projects.
  – If so, the most difficult task facing the CAWG will be how to allocate the costs of projects needed to first bring the SPP system up to a level playing field.
4B: Cost Allocation Should Wait Until the SPP Has Developed A Portfolio

- The CAWG recommends that no final determination be made on cost allocation until a portfolio of economic projects that provide region-wide benefits is developed.
  - Having a portfolio of projects will move the focus away from concerns that specific projects do not provide region-wide benefits and provide a basis for inclusion of a region-wide rate component.
  - This will also allow time for the development of long-term measures of benefits that will help to address concerns over just using short-term benefits to allocate long-term costs.
  - The CAWG will not wait for SPP to develop a portfolio to discuss various cost allocation alternatives, but does recommend that a final decision not be made until such a portfolio is available.
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