

150 FERC ¶ 61,044
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
Norman C. Bay, and Colette D. Honorable.

Duke Energy Carolinas, LLC Duke Energy Florida, Inc.	Docket Nos. ER13-1922-000
Florida Power & Light Company	ER13-1929-000
Tampa Electric Company	ER13-1932-000
Orlando Utilities Commission	NJ13-11-000
Duke Energy Carolinas, LLC Duke Energy Progress, Inc.	ER13-1928-000
Louisville Gas and Electric Company	ER13-1930-000
Ohio Valley Electric Corporation	ER13-1940-000
Alabama Power Company	ER13-1941-000
South Carolina Electric & Gas Company	ER13-1935-000

ORDER ON COMPLIANCE FILINGS

(Issued January 23, 2015)

Paragraph Numbers

I. Background	6.
II. Compliance Filings	8.
A. Florida Filing Parties-SERTP Filing Parties Compliance Filings	8.
B. South Carolina-SERTP Filing Parties Compliance Filings.....	10.
III. Notices of Filings and Responsive Pleadings.....	11.
A. Duke Florida Compliance Filing (Docket No. ER13-1922-000).....	11.

B. FP&L Compliance Filing (Docket No. ER13-1929-000)	13.
C. Tampa Electric Compliance Filing (Docket No. ER13-1932-000).....	15.
D. Orlando Commission Compliance Filing (Docket No. NJ13-11-000)	17.
E. South Carolina Compliance Filing (Docket No. ER13-1935-000)	18.
F. Duke Carolinas Compliance Filing (Docket No. ER13-1928-000).....	20.
G. Southern Companies Compliance Filing (Docket No. ER13-1941-000)	22.
H. LG&E/KU’s Compliance Filing (Docket No. ER13-1930-000)	24.
I. OVEC Compliance Filing (Docket No. ER13-1940-000).....	26.
IV. Discussion	28.
A. Procedural Matters	28.
B. Substantive Matters	30.
1. Interregional Transmission Coordination Requirements.....	32.
a. General Requirements	32.
i. Compliance Filings.....	33.
ii. Commission Determination.....	37.
b. Implementation of the Interregional Transmission Coordination Requirements ...	41.
i. Data Exchange and Identifying Interregional Transmission Facilities	41.
(a) Compliance Filings	43.
(b) Protests/Comments	49.
(c) Answers.....	52.
(d) Commission Determination	63.
ii. Procedure for Joint Evaluation	74.
(a) Compliance Filings	77.
(b) Protests/Comments	82.
(c) Answers.....	89.
(d) Commission Determination	97.
iii. Transparency and Stakeholder Participation.....	106.
(a) Compliance Filings	108.
(b) Protests/Comments	110.
(c) Answers.....	112.
(d) Commission Determination	116.
2. Cost Allocation	122.
a. Compliance Filings.....	135.
b. Protests/Comments.....	156.
c. Answers	167.
d. Commission Determination	182.
3. Other	203.
a. Compliance Filings	203.
b. Commission Determination	204.

1. On July 10, 2013, Tampa Electric Company (Tampa Electric), Florida Power & Light Company (FP&L), Duke Energy Florida, Inc. (Duke Florida),¹ and Orlando Utilities Commission (Orlando Commission)² (collectively, Florida Filing Parties) separately submitted, pursuant to section 206 of the FPA, revisions to their respective OATTs³ to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000, with respect to the public utility transmission providers that are enrolled in the neighboring Southeastern Regional Transmission Planning (SERTP) region. Florida Filing Parties are enrolled in the Florida Reliability Coordinating Council, Inc. (FRCC) transmission planning region.

2. On July 10, 2013, South Carolina Electric & Gas Company (South Carolina), submitted, pursuant to section 206 of the FPA, revisions to its OATT to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000, with respect to the public utility transmission providers that are enrolled in the

¹ Duke Energy Carolinas, LLC filed on behalf of its affiliate, Duke Florida. Duke Florida is a subsidiary of Duke Energy Corporation and shares a joint open access transmission tariff (OATT) with Duke Energy Carolinas, LLC. Duke Florida Compliance Filing at 2 n3.

² Orlando Commission submitted revisions to its safe harbor OATT transmission planning process under section 206 of the Federal Power Act (FPA), 16 U.S.C. § 824e (2012) in compliance with Order No. 1000 (*Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh'g*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014)). However, Orlando Commission is not a public utility under section 201 of the FPA, 16 U.S.C. § 824 (2012), and is not subject to the requirements of FPA sections 205, 16 U.S.C. § 824d (2012), and 206; therefore, we will review Orlando Commission's proposed revisions to its transmission planning and cost allocation process under the reciprocity standard to determine whether such revisions substantially conform or are superior to the *pro forma* OATT, as it has been modified by Order No. 1000.

³ Tampa Electric, FP&L, and Orlando Commission submitted changes to Attachment K of their OATTs, and Duke Florida submitted changes to Attachment N-1 of Duke Energy Carolinas, LLC's OATT. Tariff records filed by all parties are listed in Appendix D to this order.

neighboring SERTP region. South Carolina is enrolled in the South Carolina Regional Transmission Planning (SCRTP) transmission planning region.

3. On July 10, 2013, pursuant to section 206 of the FPA, Duke Energy Carolinas LLC and Duke Energy Progress, Inc. (Duke Carolinas);⁴ Southern Company Services, Inc. acting as agent for Alabama Power Company, Georgia Power Company, Gulf Power Company, and Mississippi Power Company (collectively, Southern Companies); Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E/KU); and Ohio Valley Electric Corporation (OVEC) (collectively, SERTP Filing Parties), separately submitted revisions to their respective OATTs to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000, with respect to the public utility transmission providers that are enrolled in the neighboring FRCC transmission region and the neighboring SCRTP transmission planning region. SERTP Filing Parties are enrolled in the SERTP transmission planning region.

4. Each of the SERTP Filing Parties submitted in its single compliance filing separate tariff records to comply with the Order No. 1000 interregional transmission coordination and cost allocation requirements with respect to the public utility transmission providers in all five of the SERTP transmission planning region's neighboring transmission planning regions: FRCC; SCRTP; Midcontinent Independent System Operator, Inc. (MISO); PJM Interconnection LLC (PJM); and Southwest Power Pool, Inc. (SPP). In this order, we address together the SERTP Filing Parties' substantially similar tariff records related to the FRCC and SCRTP regions and that are listed in Appendix D.⁵ We clarify that, although we address SERTP Filing Parties' separate compliance filings with the neighboring FRCC transmission region and the neighboring SCRTP transmission planning region together in this order for purposes of administrative ease, we do not intend to combine these compliance filings.

5. In this order, the Commission conditionally accepts SERTP Filing Parties' and Florida Filing Parties' compliance filings and conditionally accepts SERTP Filing Parties' and South Carolina's compliance filings, subject to further compliance filings. As discussed below, SERTP Filing Parties and Florida Filing Parties and, separately, SERTP Filing Parties and South Carolina are required to submit further compliance filings within 60 days of the date of issuance of this order.

⁴ Duke Carolinas states that its Order No. 1000 interregional compliance filing is submitted under protest. Duke Carolinas Compliance Filing at 3 (citing Duke Carolinas, Request for Rehearing, Docket No. ER13-83-001 (filed March 25, 2013)).

⁵ We address SERTP Filing Parties' tariff records related to MISO, PJM, and SPP in separate orders.

I. Background

6. In Order No. 1000, the Commission adopted a package of reforms addressing transmission planning and cost allocation that, taken together, are designed to ensure that Commission-jurisdictional services are provided at just and reasonable rates and on a basis that is just and reasonable and not unduly discriminatory or preferential. In particular, the Commission determined that the transmission planning requirements of Order No. 890⁶ were too narrowly focused geographically and failed to provide for adequate analysis of the benefits associated with interregional transmission facilities in neighboring transmission planning regions.⁷ The Commission concluded that interregional transmission coordination reforms were necessary.⁸ Thus, the Commission required each public utility transmission provider to establish further procedures with each of its neighboring transmission planning regions for the purpose of: (1) coordinating and sharing the results of the respective regional transmission plans to identify possible interregional transmission facilities that could address regional transmission needs more efficiently or cost-effectively than separate regional transmission facilities;⁹ and (2) jointly evaluating those interregional transmission

⁶ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 369.

⁸ *Id.* P 370.

⁹ While the Commission required public utility transmission providers to establish further procedures with each of its neighboring transmission planning regions to coordinate and share the results of their respective regional transmission plans to identify possible interregional transmission facilities that could address regional transmission needs more efficiently or cost-effectively than separate regional transmission facilities, the Commission neither required nor precluded public utility transmission providers from conducting interregional transmission planning. *See, e.g.*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 399 (clarifying that “the interregional transmission coordination requirements that [the Commission] adopt[s] do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan” and, “[t]o the extent that public utility transmission providers wish to participate in processes that lead to the

(continued ...)

facilities that the pair of neighboring transmission planning regions identify, including those proposed by transmission developers and stakeholders.¹⁰ The Commission defined an interregional transmission facility as “one that is located in two or more transmission planning regions.”¹¹ Furthermore, the Commission required each public utility transmission provider to describe the methods by which it will identify and evaluate interregional transmission facilities and to include a description of the type of transmission studies that will be conducted to evaluate conditions on neighboring systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional facilities.¹² Consistent with the requirement that public utility transmission providers must describe the methods by which they will identify and evaluate interregional transmission facilities, the Commission explained that “each public utility transmission provider must explain in its OATT how stakeholders and transmission developers can propose interregional transmission facilities for the public utility transmission providers in neighboring transmission planning regions to evaluate jointly.”¹³

development of interregional transmission plans, they may do so and, as relevant, rely on such processes to comply with the requirements of this Final Rule.”). The Commission also required that “the developer of an interregional transmission project to first propose its transmission project in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located.” *Id.* P 436.

¹⁰ Order No 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). The Commission clarified that “the requirement to coordinate with neighboring regions applies to public utility transmission providers within a region as a group, not to each individual public utility transmission provider acting on its own. For example, within an [Regional Transmission Organization (RTO)] or [Independent System Operator (ISO)], the RTO or ISO would develop an interregional cost allocation method or methods with its neighboring regions on behalf of its public utility transmission owning members.” Order No. 1000-A, 139 FERC ¶ 61,132 at P 630 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 584).

¹¹ Order No 1000-A, 139 FERC ¶ 61,132 at P 494 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 482 n.374).

¹² *Id.* (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398).

¹³ *Id.* P 522.

7. In addition, in Order No. 1000, the Commission required that each public utility transmission provider in a transmission planning region have, together with the public utility transmission providers in its own transmission planning region and a neighboring transmission planning region, a common method or methods for allocating the costs of a new interregional transmission facility among the beneficiaries of that transmission facility in the two neighboring transmission planning regions in which the transmission facility is located.¹⁴ The Commission also required that each public utility transmission provider's interregional cost allocation method or methods satisfy six interregional cost allocation principles.¹⁵ To be eligible for interregional cost allocation, an interregional transmission facility must be selected in the relevant transmission planning regions' regional transmission plans for purposes of cost allocation.¹⁶

II. Compliance Filings

A. Florida Filing Parties-SERTP Filing Parties Compliance Filings

8. Florida Filing Parties¹⁷ and SERTP Filing Parties¹⁸ submitted separate but coordinated interregional compliance filings in which they propose to revise their respective regional transmission planning processes to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000. Florida Filing Parties and SERTP Filing Parties state that their individual compliance filings each contain a common transmittal letter and common tariff language, with each filing party individually submitting relevant revised common tariff language to its respective

¹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 578, 582, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

¹⁵ *Id.* P 603.

¹⁶ *Id.* P 400.

¹⁷ Florida Filing Parties filed their respective compliance filings in Docket Nos. ER13-1922-000 (Duke Florida), ER13-1929-000 (FP&L), ER13-1932-000 (Tampa Electric), and NJ13-11-000 (Orlando Commission).

¹⁸ SERTP Filing Parties filed their respective compliance filings in Docket Nos. ER13-1928-000 (Duke Carolinas), ER13-1941-000 (Southern Companies), ER13-1930-000 (LG&E/KU), and ER13-1940-000 (OVEC).

OATT.¹⁹ In this order, we refer to Florida Filing Parties and SERTP Filing Parties together as Florida Filing Parties-SERTP Filing Parties and refer to their common proposal as the Florida Filing Parties-SERTP Filing Parties proposal or compliance filing.

B. South Carolina-SERTP Filing Parties Compliance Filings

10. South Carolina²⁰ and SERTP Filing Parties submitted separate but coordinated interregional compliance filings in which they propose to revise their respective regional transmission planning processes to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000. South Carolina and SERTP Filing Parties state that their individual compliance filings each contain a common transmittal letter and common tariff language, with each filing party individually submitting relevant revised common tariff language to its respective OATT.²¹ In this order, we refer to South Carolina and SERTP Filing Parties together as South Carolina-SERTP Filing Parties and refer to their common proposal as the South Carolina-SERTP Filing Parties proposal or compliance filing.

¹⁹ *See, e.g.*, FP&L Compliance Filing, Docket No. ER13-1929-000, at 2-3; Southern Companies Compliance Filing, Docket No. ER13-1941-000 at 3. Given this uniformity, the Commission will cite to Southern Companies' transmittal letter and OATT when referencing SERTP Filing Parties' proposal and will cite to FP&L's transmittal letter and OATT when referencing Florida Filing Parties' proposal. However, Florida Filing Parties-SERTP Filing Parties note that the common tariff language is not absolutely identical across all of their compliance filings; instead it reflects slight variations in terminology used in the corresponding OATTs. *See, e.g.*, FP&L Compliance Filing, Docket No. ER13-1929-000, at 3 n.5; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 5. Where differences between or among the filings are addressed, we cite to that individual filing party's OATT, as appropriate.

²⁰ South Carolina filed its compliance filing in Docket No. ER13-1935-000.

²¹ *See, e.g.*, South Carolina Compliance Filing, Docket No. ER13-1935-000 at 2; Southern Companies Compliance Filing, Docket No. ER13-1941-000 at 3. Given this uniformity, the Commission will cite to Southern Companies' transmittal letter and OATT when referencing SERTP Filing Parties' proposal and will cite to South Carolina's transmittal letter and OATT when referencing South Carolina's proposal. Where differences between or among the filings are addressed, the Commission will cite to that individual filing party's filing as appropriate.

III. Notices of Filings and Responsive Pleadings

A. Duke Florida Compliance Filing (Docket No. ER13-1922-000)

11. Notice of Duke Florida's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,197 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order.²² Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

12. Answers to the Duke Florida compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

B. FP&L Compliance Filing (Docket No. ER13-1929-000)

13. Notice of FP&L's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,197 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

14. Answers to the FP&L compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

C. Tampa Electric Compliance Filing (Docket No. ER13-1932-000)

15. Notice of Tampa Electric's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,197 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

16. Answers to the Tampa Electric compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

²² The entity abbreviations listed in Appendices A, B, and C are used throughout this order.

D. Orlando Commission Compliance Filing (Docket No. NJ13-11-000)

17. Notice of Orlando Commission's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,197 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. No comments or protests were filed.

E. South Carolina Compliance Filing (Docket No. ER13-1935-000)

18. Notice of South Carolina's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,192 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

19. Answers to the South Carolina compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

F. Duke Carolinas Compliance Filing (Docket No. ER13-1928-000)

20. Notice of Duke Carolinas' compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,192 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

21. Answers to the Duke Carolinas compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

G. Southern Companies Compliance Filing (Docket No. ER13-1941-000)

22. Notice of Southern Companies' compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,192 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

23. Answers to the Southern Companies compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

H. LG&E/KU's Compliance Filing (Docket No. ER13-1930-000)

24. Notice of LG&E/KU's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,192 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

25. Answers to the LG&E/KU compliance filing were filed by the entities listed in Appendix C to this order and are addressed below.

I. OVEC Compliance Filing (Docket No. ER13-1940-000)

26. Notice of OVEC's compliance filing was published in the *Federal Register*, 78 Fed. Reg. 43,192 (2013), with interventions and protests due on or before August 26, 2013, which the Commission subsequently extended to September 9, 2013. The entities that filed notices of intervention and motions to intervene are listed in Appendix A to this order. Protests and comments were filed by the entities listed in Appendix B to this order and are addressed below.

27. Answers to the OVEC compliance filing were by the entities listed in Appendix C to this order and are addressed below.

IV. Discussion

A. Procedural Matters

28. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the notices of intervention and timely, unopposed motions to intervene serve to make the entities that filed them parties to these proceedings. In addition, given the early stage of these proceedings and the absence of undue prejudice or delay, we grant PPL Electric Utilities' late-filed motions to intervene in the Duke Carolinas, LG&E/KU, OVEC, and Southern Companies Compliance Filings and in the South Carolina and Florida Parties Compliance Filings.

29. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2014), prohibits an answer to a protest or an answer unless otherwise ordered by the decisional authority. We accept the answers filed in these proceedings because they have provided information that assisted us in our decision-making process.

B. Substantive Matters

30. We find that the Florida Filing Parties-SERTP Filing Parties proposal partially complies with the interregional transmission coordination and cost allocation

requirements adopted in Order No. 1000. Accordingly, we accept Tampa Electric's, FP&L's, Duke Florida's, and SERTP Filing Parties' respective compliance filings to be effective January 1, 2016, subject to further compliance filings as discussed below. We direct Tampa Electric, FP&L, Duke Florida, and SERTP Filing Parties to submit further compliance filings within 60 days of the date of issuance of this order. We also find that Orlando Commission's revised OATT is essentially the same as Tampa Electric's, FP&L's, and Duke Florida's revised OATTs. Thus, subject to the modifications discussed below, Orlando Commission's revised OATT fulfills the interregional transmission coordination and cost allocation requirements of Order No. 1000.

31. We also find that the South Carolina-SERTP Filing Parties proposal partially complies with the interregional transmission coordination and cost allocation requirements adopted in Order No. 1000. Accordingly, we accept South Carolina-SERTP Filing Parties' respective compliance filings to be effective January 1, 2015, subject to further compliance filings as discussed below. We direct South Carolina-SERTP Filing Parties to submit the further compliance filings within 60 days of the date of issuance of this order.

1. Interregional Transmission Coordination Requirements

a. General Requirements

32. The Commission required each public utility transmission provider, through its regional transmission planning process, to coordinate with the public utility transmission providers in each of its neighboring transmission planning regions within its interconnection to implement the interregional transmission coordination requirements adopted in Order No. 1000.²³ The Commission also required public utility transmission providers in each pair of neighboring transmission planning regions to develop the same language to be included in each public utility transmission provider's OATT that describes the interregional transmission coordination procedures for that particular pair of regions.²⁴ Alternatively, if the public utility transmission providers so choose, the Commission allowed these procedures to be reflected in an interregional transmission coordination agreement among the public utility transmission providers within neighboring transmission planning regions that is filed with the Commission.²⁵

²³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 415.

²⁴ *Id.* P 475; *see also id.* P 346; Order No. 1000-A, 139 FERC ¶ 61,132 at P 223.

²⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 346, 475, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 223.

i. Compliance Filings

33. SERTP Filing Parties state that they have five neighboring transmission planning regions, two of which are FRCC and SCRTP.²⁶ SERTP Filing Parties explain that they are the public utility transmission providers that sponsor the SERTP transmission planning region.²⁷ SERTP Filing Parties state that the non-public utility transmission providers that sponsor the SERTP region the SERTP Filing Parties' interregional compliance filings.²⁸ SERTP Filing Parties state that the sponsors of the SERTP region are referred to collectively as the SERTP Sponsors.²⁹ Florida Filing Parties state that the FRCC transmission planning region has one interregional interface with the SERTP region.³⁰ South Carolina states that the SCRTP region borders only the SERTP transmission planning region.³¹

34. SERTP Filing Parties state that they have been able to reach complete agreement on all substantive points to develop and adopt parallel tariff language with the public utility transmission providers in the FRCC and SCRTP transmission planning regions for their mutual seams.³² Likewise, Florida Filing Parties and South Carolina state that they have each agreed on a common approach and parallel tariff language with SERTP Filing Parties in their respective OATTs to satisfy Order No. 1000's interregional transmission coordination and cost allocation requirements for their respective seams with SERTP. However, Florida Filing Parties-SERTP Filing Parties state that their proposed tariff

²⁶ Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 2.Southern Companies Compliance Filing, Docket No. ER13-1941-000 at

²⁷ *Id.*

²⁸ *Id.* at 3.

²⁹ *Id.* at 1-2.

³⁰ FP&L Compliance Filing, Docket No. ER13-1929-000, at 2.

³¹ *See, e.g.*, FP&L Compliance Filing, Docket No. ER13-1929-000 at *id.*; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 2.

³² Southern Companies Compliance Filing, Docket No. ER13-1941-000, Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 2-3.

revisions are not identical across their filings as they reflect slight variations in terminology used in the corresponding OATTs.³³

35. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that for a transmission project to be considered for interregional cost allocation within their respective neighboring transmission planning regions, the transmission project must be interregional in nature. For a transmission project to be interregional in nature, they propose that the transmission project must: (1) be located in both the SERTP and FRCC regions or SERTP and SCRTP regions; (2) interconnect to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional planning process; and (3) meet the criteria for transmission projects potentially eligible to be included in the regional transmission plans for purposes of cost allocation in both the SERTP and FRCC regions or SERTP and SCRTP regions, pursuant to their respective regional transmission planning processes.³⁴

36. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties request that their proposed changes become effective in the transmission planning cycle after their Order No. 1000 regional transmission planning processes became effective, assuming the Commission does not require extensive changes to the regions' transmission planning processes.³⁵

³³ For example, some filing parties use the term "Transmission Owner" while others use the term "Transmission Provider." *See, e.g.*, FP&L Compliance Filing, Docket No. ER13-1929-000, at 3 n.5; Southern Companies Compliance Filing, Docket No. ER13-1935-000, at 5.

³⁴ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1 A; FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1 A.

³⁵ FP&L Compliance Filing, Docket No. ER13-1929-000, at 20; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 14; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 49. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties, respectively state that, for example, if Florida Filing Parties', South Carolina's, and SERTP Filing Parties' respective regional transmission planning OATT provisions are effective in 2014, then Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties interregional OATT provisions would become effective on January 1, 2015. However, should the Commission require extensive changes, Florida Filing Parties, South Carolina, and SERTP Filing Parties each state that it may not prove feasible to effectuate those changes to the interregional transmission planning process by January 1, 2015.

ii. Commission Determination

37. We find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties partially comply with the general interregional transmission coordination requirements of Order No. 1000. Specifically, we find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' respective compliance filings comply with the requirement to coordinate with the neighboring public utility transmission providers within their interconnection to implement the interregional transmission coordination requirements adopted in Order No. 1000. FRCC and SERTP as well as SCRTP and SERTP are neighboring transmission planning regions in the same interconnection, and these regions have proposed procedures to coordinate with each neighboring transmission region, including each other.

38. We also find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties have submitted common OATT language, which complies with Order No. 1000's requirement to develop the same language to be included in each OATT that describes the interregional transmission coordination procedures for that particular pair of regions.³⁶

39. We find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed criteria for defining a transmission project as interregional in nature partially complies with Order No. 1000's definition of an interregional transmission facility as one that is located in two or more transmission planning regions.³⁷ Specifically, the requirement that the transmission project must interconnect to the transmission facilities of one or more SERTP Filing Parties and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process is overly limiting and inconsistent with Order No. 1000. While the Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposal to allow interconnecting interregional transmission facilities to be

³⁶ See Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 475; *see also id.* P 346; *see also* Order No. 1000-A, 139 FERC ¶ 61,132 at P 223. We also note that while Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose tariff language in their respective compliance filings that is substantially similar, their respective proposals contain several differences that are not minor variations in terminology. We address the differences in the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties proposals in the relevant sections of this order.

³⁷ Order No. 1000-A, 139 FERC ¶ 61,132 at P 494 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 482 n.374).

eligible for interregional cost allocation is consistent with the requirements of Order No. 1000, limiting this interconnection to only those transmission projects that will interconnect to an enrolled member of the SERTP and FRCC transmission planning regions or the SERTP and SCRTP transmission planning regions is unduly limiting. Order No. 1000 did not limit stakeholders and transmission developers to proposing only interregional transmission facilities that would interconnect to *existing* transmission facilities of *an existing* transmission owner, or a transmission owner *enrolled* in the respective transmission planning regions.³⁸ The proposed language would preclude interregional transmission facilities from interconnecting with transmission facilities that are selected in the regional plan for purposes of cost allocation but that are currently under development by a transmission developer who has not yet become a sponsor in SERTP or an enrolled member of the FRCC or SCRTP transmission planning regions. Thus, we find that this proposed definition does not comply with Order No. 1000.³⁹ Accordingly, we direct South Carolina, SERTP Filing Parties, Tampa Electric, FP&L, and Duke Florida to submit further compliance filings to include a definition of an interregional transmission facility that is consistent with Order No. 1000, which defines an interregional transmission facility as one that is located in two or more transmission planning regions. Likewise, Orlando Commission should also submit a further compliance filing to address this issue.

40. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties request effective dates for their proposed revisions in the transmission planning

³⁸ In its orders on compliance with the regional transmission and cost allocation requirements of Order No. 1000, the Commission required regions to remove or clarify proposals that required a transmission provider to own, control, or provide service over transmission facilities with the respective regions in order to enroll in the respective region, finding that this logic appears circular in nature. *See* SERTP Regional Rehearing and Compliance Order, 147 FERC ¶ 61,241 at P 53 (2014); *Tampa Elec. Co.*, 148 FERC ¶ 61,172, at P 43 (2014).

³⁹ We note that the Commission found other definitions of an interregional transmission facility to comply with Order No. 1000. For example, in its December 2014 order, the Commission found Western Filing Parties' proposal to define an interregional transmission project as a proposed new transmission project that would directly interconnect electrically to existing or planned transmission facilities in two or more planning regions, and that would be submitted into the regional transmission planning process of all such planning regions consistent with Order No. 1000. *Public Service Company of New Mexico*, 149 FERC ¶ 61,247, at P 24 (2014) (Western Interregional Order).

cycle that takes place subsequent to when their Order No. 1000 regional transmission planning processes become effective.⁴⁰ South Carolina also states that, consistent with the foregoing, it proposes an effective date in coordination with SERTP Filing Parties' proposed effective date. South Carolina's and SERTP Filing Parties' Order No. 1000 regional transmission planning processes became effective on April 19, 2013; and June 1, 2014, respectively.⁴¹ Thus, we find the proposed effective date of January 1, 2015 to be reasonable for the South Carolina-SERTP Filing Parties proposal and accept these compliance filings effective January 1, 2015.⁴² Florida Filing Parties' Order No. 1000 regional transmission planning processes became effective January 1, 2015,⁴³ thus we find the proposed effective date of January 1, 2016 to be reasonable for the Florida Filing Parties-SERTP Filing Parties proposal and accept these compliance filings effective January 1, 2016.

b. Implementation of the Interregional Transmission Coordination Requirements

i. Data Exchange and Identifying Interregional Transmission Facilities

41. In Order No. 1000, the Commission required each public utility transmission provider to establish procedures with each of its neighboring transmission planning regions to coordinate and share the results of their respective regional transmission plans

⁴⁰ For instance, Florida Filing Parties state that if both FRCC's and SERTP's regional planning proposals are effective in 2014, then the interregional proposals would become effective in 2015. Similarly, SERTP Filing Parties state that they assume their regional planning proposals will be effective January 1, 2014, meaning that the interregional proposals would become effective in 2015. FP&L Compliance Filing, Docket No. ER13-1929, at 20; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 49.

⁴¹ *S.C. Elec. & Gas*, 147 FERC ¶ 61,126 at P 36; SERTP Regional Rehearing and Compliance Order, 147 FERC ¶ 61,241 at P 52.

⁴² *See, e.g., Duke Energy Carolinas, LLC*, 145 FERC ¶ 61,059, at P 6 (2013). In the order, the Commission accepted the SERTP Public Utility Sponsors' proposal to adopt a June 1, 2014 effective date for implementation of their revised Order No. 1000 regional transmission planning and cost allocation processes.

⁴³ *Tampa Elec. Co.*, 148 FERC ¶ 61,172 at P 46; SERTP Regional Rehearing and Compliance Order, 147 FERC ¶ 61,241 at P 52.

to identify interregional transmission facilities.⁴⁴ As part of this requirement, the Commission required the public utility transmission providers to enhance their existing regional transmission planning process to provide for the identification of interregional transmission facilities that may be more efficient or cost-effective solutions to their respective regional transmission needs.⁴⁵ The Commission also required each public utility transmission provider to adopt interregional transmission coordination procedures that provide for the exchange of transmission planning data and information at least annually.⁴⁶ The Commission found that the interregional transmission coordination procedures must include the specific obligations for sharing transmission planning data and information rather than only an agreement to do so.⁴⁷ However, the Commission did not dictate the specific procedures or the level of detail for the procedures pursuant to which transmission planning data and information must be exchanged. The Commission allowed each public utility transmission provider to develop procedures to exchange transmission planning data and information, which the Commission anticipated would reflect the type and frequency of meetings that are appropriate for each pair of regions and will accommodate each pair of region's transmission planning cycles.⁴⁸

42. In addition, the Commission required the developer of an interregional transmission project to first propose its transmission project in the regional transmission planning processes of each of the neighboring transmission planning regions in which the transmission facility is proposed to be located.⁴⁹ Thus, the Commission required that each public utility transmission provider explain in its OATT how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation.⁵⁰

⁴⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). *See also* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 399 -436.

⁴⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396; *see also id.* P 398.

⁴⁶ *Id.* P 454.

⁴⁷ *Id.* P 455.

⁴⁸ *Id.*

⁴⁹ *Id.* P 436, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

⁵⁰ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

(a) **Compliance Filings**

43. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that through their regional transmission planning processes, they have adopted common interregional transmission coordination procedures that provide for the exchange of planning data and information. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to meet no less than once per year with the public utility transmission providers in the FRCC and SERTP or SCRTP and SERTP regions to facilitate the interregional transmission coordination procedures.⁵¹

44. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to review each other's current regional transmission plans and engage in data exchange and joint evaluation of proposed interregional transmission facilities biennially.⁵² Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that, at least annually, each transmission provider shall exchange power-flow models and associated data used in the regional transmission planning processes to develop their then-current regional transmission plans.⁵³ They state that this data exchange will typically occur by the beginning of each transmission planning region's transmission planning cycle and that additional transmission-based models and data may be exchanged between the transmission providers in the relevant transmission planning regions as necessary, and if requested.⁵⁴

45. In addition, South Carolina-SERTP Filing Parties propose to review each other's current *local* transmission plans⁵⁵ and to exchange power-flow models and associated

⁵¹ See, e.g., FP&L, FPL OATT, Attachment K-1 (0.0.0), § 1.1; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 1.1; Southern Companies, OATT, Ex. K-4 (0.0.0), § 1.1 and Ex. K-7 § 1.1.

⁵² *Id.*

⁵³ See, e.g., FP&L, FPL OATT, Attachment K-1 (0.0.0), § 2.1; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.1; Southern Companies, OATT, Ex. K-4 (0.0.0), §2.1, Ex. K-7, §2.1.

⁵⁴ *Id.*

⁵⁵ See, e.g., SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.1; Southern Companies, OATT, Ex. K-7 (0.0.0), §2.1.

data used in the transmission planning process to develop their then-current local transmission plans.⁵⁶

46. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that they will exchange their then-current regional transmission plans in accordance with their regional transmission planning processes. Specifically, they propose to post the SERTP regional transmission plans on SERTP's regional planning website, with notice to FRCC or SCRTP so those regions may retrieve the SERTP regional transmission plans, and that FRCC and SCRTP propose to exchange regional transmission plans in a similar manner.⁵⁷

47. In describing the methods by which Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will identify potential interregional transmission facilities, the parties propose that they will review one another's then-current regional plans⁵⁸ and if, through this review, they identify a potential interregional transmission project that could be more efficient or cost-effective⁵⁹ than transmission projects included in the regional (or local) transmission plans, the transmission providers in the relevant neighboring transmission planning regions will jointly evaluate the potential interregional transmission project.⁶⁰

48. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose OATT revisions that allow stakeholders to propose interregional

⁵⁶ *See, e.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), §§ 1.1, 2.1; Southern Companies, OATT, Ex. K-7 (0.0.0), §§ 1.1, 2.1.

⁵⁷ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.2; FP&L, FPL OATT, Attachment K-1 (0.0.0), § 2.2; Southern Companies, OATT, Ex. K-4 (0.0.0), §2.2, Ex. K-7, §2.2.

⁵⁸ In addition, South Carolina and SERTP Filing Parties propose to review one another's then-current *local* transmission plans to identify potential interregional transmission facilities. *See* SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.1; Southern Companies, OATT, Ex. K-7 (0.0.0), § 3.1.

⁵⁹ Florida Filing Parties propose to identify potential interregional transmission projects that may be "more efficient *and* cost-effective" rather than "more efficient *or* cost-effective." *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 3.1; Southern Companies, OATT, Ex. K-4 (0.0.0), §3.1.

⁶⁰ *See, e.g., id.*

transmission projects that may be more efficient or cost-effective than projects included in SERTP's and FRCC's regional transmission plans or SERTP's and SCRTP's regional or *local* transmission plans.⁶¹

(b) Protests/Comments

49. Four Public Interest Organizations argue that the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties compliance filings limit the type of data they propose to share to power flow models, associated data, “additional transmission-based models and data . . . as necessary and if requested.”⁶² They state that the phrase “as necessary and if requested” is open to interpretation and does not ensure data necessary for joint identification and evaluation will be shared between regions absent criteria around which to base related decisions.

50. Four Public Interest Organizations argue that the Commission should require Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties to include stability models and other models in the regions' transmission planning processes as part of Order No. 1000's requirement for the identification of interregional transmission facilities that may be more efficient or cost-effective transmission solutions than existing regional transmission planning needs. Four Public Interest Organizations argue that these clarifications are necessary to ensure a comprehensive data exchange so the transmission planning regions can effectively identify and evaluate more cost-effective interregional transmission solutions.⁶³

51. FMPA/Seminole state that the Florida Filing Parties-SERTP Filing Parties proposal fails to provide for sharing of information regarding the respective needs of each neighboring transmission planning region.⁶⁴ FMPA/Seminole assert that the Florida Filing Parties-SERTP Filing Parties compliance filing does not describe a formal procedure by which FRCC and SERTP members will share and consider regional needs

⁶¹ *See, e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), § 3.2; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.2; Southern Companies, OATT, Ex. K-4 (0.0.0), § 3.2 and Ex. K-7, § 3.2.

⁶² Four Public Interest Organizations Non-RTO Protest at 12 (citing Southern Companies, OATT, Ex. K-4 (0.0.0), § 2.1).

⁶³ *Id.* at 13-14.

⁶⁴ FMPA/Seminole Protest at 13.

as required by Order No. 1000.⁶⁵ FMPA/Seminole assert that the data exchange procedures lack sufficient detail. FMPA/Seminole dispute Florida Filing Parties-SERTP Filing Parties' claim that consideration of public policy or economic needs is not required at the interregional level.⁶⁶ FMPA/Seminole assert that the Commission clarified that, while it was not requiring consideration of transmission needs driven by public policy requirements as part of the interregional transmission process, such consideration is an essential part of the evaluation of an interregional transmission project as part of the relevant regional transmission planning process.⁶⁷ FMPA/Seminole argue that Florida Filing Parties-SERTP Filing Parties cannot rely solely on state-integrated resource planning processes to evaluate economic and public policy needs, since the Commission has already rejected that proposal.⁶⁸

(c) Answers

52. SERTP Joint Answering Parties and Florida Answering Parties argue that their data exchange proposal meets the requirements of Order No. 1000 and that Four Public Interest Organizations do not identify any Order No. 1000 requirement that the parties exchange stability models and other models used in the regional transmission planning process.⁶⁹ They assert that Order No. 1000 requires that parties exchange data sufficient to make neighboring transmission planning regions aware of each other's transmission plans and the assumptions and analysis that support those plans, which the Florida Filing Parties-SERTP Filing Parties proposal achieves through the exchange of the power-flow models and associated data that support each regional transmission plan.⁷⁰ Moreover, SERTP Joint Answering Parties and Florida Answering Parties state that, while power-flow models and associated data will be provided automatically each year, the Florida Filing Parties-SERTP Filing Parties proposal provides SERTP and its neighboring regions with the means to request additional information if needed. Thus, SERTP Joint

⁶⁵ *Id.*

⁶⁶ *Id.* at 17.

⁶⁷ *Id.* (citing Order No. 1000-A, 139 FERC ¶ 61,132 at 500).

⁶⁸ *Id.* at 14 (citing *Tampa Elec. Co.*, 143 FERC ¶ 61,254, at P 78, 82, 86-90 (2013)).

⁶⁹ SERTP Joint Answer at 15; Florida Answering Parties Answer at 14.

⁷⁰ *Id.*

Answering Parties and Florida Answering Parties conclude that the transmission planning regions are free to make such requests.⁷¹

53. Florida Answering Parties maintain that Order No. 1000 requires public utility transmission providers to exchange planning data and information, including any underlying assumptions and analysis that supports those plans, in a manner sufficient to make neighboring transmission planning regions aware of each other's transmission plans. Florida Answering Parties state that they meet the exchange of information and transmission planning data exchange requirements through the regions' exchange of power-flow models and associated data, which support the FRCC and SERTP regional transmission plans.⁷²

54. Florida Answering Parties maintain that the FRCC transmission planning region has an open transmission planning process through which neighboring transmission planning regions are free to request additional information on the models and data used in the regional transmission planning process. Florida Answering Parties therefore question Four Public Interest Organizations' arguments on the use of the phrase "as necessary and if requested." Florida Answering Parties and SERTP Joint Answering Parties claim that this language grants the FRCC and SERTP transmission planning regions sufficient flexibility to determine the type and quantity of additional information to be provided under a given set of circumstances, without having to determine in advance what those circumstances are or the type of information to be exchanged.⁷³

55. SERTP Joint Answering Parties state that Order No. 1000 did not require that regions exchange all information and every data point used or considered in developing their annual transmission plans.⁷⁴ SERTP Joint Answering Parties argue that, depending on the type of analysis included in the power-flow models, the "associated data" will likely include the type of stability information that Four Public Interest Organizations claim is lacking.⁷⁵

⁷¹ *Id.*

⁷² Florida Answering Parties Answer at 14.

⁷³ *Id.* at 15; SERTP Joint Answer at 16.

⁷⁴ SERTP Joint Answer at 16.

⁷⁵ *Id.*

56. In addition, SERTP Joint Answering Parties state that the regions exchange transmission-related data and planning information regularly through the SERC Reliability Corporation (SERC),⁷⁶ the Eastern Interconnection Reliability Assessment Group, the Multi-Regional Modeling Working Group, and other reliability-related processes.⁷⁷ SERTP Joint Answering Parties contend that these pre-existing activities will not be diminished or eliminated, but rather complemented by data exchanges pursuant to Order No. 1000 interregional transmission coordination requirements.⁷⁸ SERTP Joint Answering Parties argue that regions will not disregard data received through other means when reviewing their neighbors' regional transmission plans, as such actions are generally required in order for the utilities to effectively comply with their "duty to serve" requirements.⁷⁹

57. SERTP Joint Answering Parties state that each region must share data with several other neighboring transmission planning regions; by starting with the power-flow models and associated data, and then providing additional information as needed, the initial data being shared between and among the regions will be consistent, providing needed flexibility to conform data produced to the individual needs of each neighboring transmission planning region.⁸⁰ Therefore, SERTP Joint Answering Parties state that there is no basis to Four Public Interest Organizations' assertion that neighboring transmission planners will not cooperate with their interregional counterparts in providing useful and necessary data. SERTP Joint Answering Parties argue that assuming transmission planning is an inherently litigious process runs counter to the interregional transmission coordination policies of Order Nos. 890 and 1000, and is inconsistent with the cooperative nature of transmission planning in the Southeast, which operates in accordance with "duty to serve obligations."⁸¹

58. SERTP Joint Answering Parties argue that Four Public Interest Organizations' desire for a joint identification mandate exceeds the requirements of Order No. 1000.

⁷⁶ SERC is the regional entity responsible for promoting reliability and adequacy of the bulk power system in the area served by its member systems.

⁷⁷ SERTP Joint Answer at 16.

⁷⁸ *Id.*

⁷⁹ *Id.* at 16-17.

⁸⁰ *Id.* at 17.

⁸¹ *Id.* at 19-20.

SERTP Joint Answering Parties assert that Order No. 1000 only requires joint evaluation, not joint identification.⁸² SERTP Joint Answering Parties argue that their commitment to engage in identification of potential interregional transmission projects fully satisfies the Order No. 1000 requirement.⁸³

59. Moreover, SERTP Joint Answering Parties contend that, although Order No. 1000 requires “transmission planning” on a regional level, it only requires “transmission coordination” on an interregional level. SERTP Joint Answering Parties assert that Four Public Interest Organizations’ request appears to call for top-down, interregional transmission planning, where identification of transmission projects must be a joint effort.⁸⁴

60. SERTP Joint Answering Parties explain that, consistent with Order No. 1000’s requirements that a formal process be included, they commit to perform a biennial review in order to identify interregional transmission projects.⁸⁵ SERTP Joint Answering Parties further explain that in conjunction with that formal process, each transmission planning region, with input from their stakeholders, can identify interregional transmission projects at any time and bring them to the attention of the neighboring region.⁸⁶ SERTP Joint Answering Parties argue that the “identification process,” itself, is not described beyond the general timeframe and procedure because it is no different than the process for identifying regional transmission projects, local projects, or any sort of project.⁸⁷ SERTP Joint Answering Parties explain that, in SERTP, transmission planners review their transmission needs – which are transmission capacity requirements required to satisfy long-term transmission commitments such as network resource designations, firm long-term point-to-point reservations, generation commitments, and native load reliably – using models to analyze how such demands can be met.⁸⁸ SERTP Joint Answering

⁸² *Id.* at 5 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 394, 435, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 396).

⁸³ *Id.*

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.* at 5-6.

⁸⁷ *Id.* at 6.

⁸⁸ *Id.* at 6-7.

Parties argue that the existing OATTs already detail how transmission projects are identified through their bottom-up transmission planning processes⁸⁹ with the additional interregional transmission coordination required by Order No. 1000-A providing potentially another stimulus for the identification of new transmission projects.⁹⁰ SERTP Joint Answering Parties assert that, in addition to the identification of transmission projects by transmission providers, SERTP's regional transmission planning process also allows for stakeholders and transmission developers to identify transmission projects for consideration.⁹¹

61. SERTP Joint Answering Parties argue that requiring more prescriptive, detailed descriptions of exactly how transmission planning must be performed would limit the flexibility that transmission planners need to address specific circumstances, thereby harming SERTP Joint Answering Parties' (who are all load-serving entities) ability to plan and expand the transmission system to satisfy their load-serving needs.⁹²

62. FMPA/Seminole assert that Florida Filing Parties-SERTP Filing Parties fail to address any of the substantive interregional transmission coordination requirements of Order No. 1000 raised in FMPA/Seminole's protest. For example, FMPA/Seminole assert that Florida Filing Parties-SERTP Filing Parties fail to address, among other things, that public utility transmission providers must do more than commit to share their regional transmission plans and other transmission planning information. Further, FMPA/Seminole state that Florida Filing Parties-SERTP Filing Parties' approach to interregional transmission coordination is inadequate to the extent that it ignores the data sharing, needs identification, alternative identification, and joint evaluation requirements of Order No. 1000.⁹³ Finally, FMPA/Seminole reject Florida Filing Parties-SERTP Filing Parties' assertions that the proposed interregional transmission coordination procedures meet Order No. 1000 obligations through Florida Filing Parties' or SERTP

⁸⁹ *Id.* at 7 (citing Southern Companies, OATT, Attachment K (2.0.0) § 6.6.2, 6.6.3).

⁹⁰ *Id.*

⁹¹ *Id.* (citing Southern Companies, OATT, Attachment K (2.0.0) § 3.5.3.3, 15).

⁹² *Id.* at 7-8.

⁹³ FMPA/Seminole Answer at 2-4.

Filing Parties' existing integrated resource planning processes or through long-term firm transmission requests under the OATT.⁹⁴

(d) **Commission Determination**

63. We find that the interregional data exchange provisions and the procedures for identifying interregional transmission facilities proposed by Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties partially comply with Order No. 1000. Accordingly, we direct South Carolina, SERTP Filing Parties, Tampa Electric, FP&L, and Duke Florida to submit, within 60 days of the date of issuance of this order, further compliance filings, as explained further below. Likewise, Orlando Commission should also submit a further compliance filing.

64. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to exchange their then-current regional transmission plans in accordance with their regional transmission planning processes, specifically by posting the SERTP regional transmission plan on the SERTP regional planning website and by exchanging the FRCC and SCRTP regional transmission plans in a similar manner. We find that this proposal complies with Order No. 1000.⁹⁵ In addition, we find reasonable South Carolina-SERTP Filing Parties' proposal to exchange their *local* transmission plans as well as their respective regional transmission plans.⁹⁶ This proposal goes beyond the minimum requirements of Order No. 1000, which requires only that public utility transmission providers establish procedures with neighboring transmission planning regions to coordinate and share the results of their regional transmission plans.⁹⁷ Thus, both the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties compliance filings comply with the requirement to propose procedures to share the results of their regional transmission plans.

⁹⁴ *Id.* at 6.

⁹⁵ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.2; FP&L, FPL OATT, Attachment K-1 (0.0.0), § 2.2; Southern Companies, OATT, Ex. K-4 (0.0.0), § 2.2, and Ex. K-7, § 2.2.

⁹⁶ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), (4.0.0), § 2.2; Southern Companies, OATT, Ex. K-7 (0.0.0), § 2.2.

⁹⁷ Order No. 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396).

65. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to exchange the power-flow models and associated data used in the regional transmission planning process to develop their then-current regional transmission plans at least annually. They also propose to exchange additional transmission-based models and data annually, or as requested.⁹⁸ We find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties comply with the requirement to adopt interregional transmission coordination procedures that include specific obligations for sharing transmission planning data and information. In addition, we find reasonable South Carolina-SERTP Filing Parties' proposed OATT revisions to exchange transmission planning data and information used to develop their then-current local transmission plans at least annually.⁹⁹

66. We reject Four Public Interest Organizations' argument that the Commission should require stability models and other models to be exchanged in the regional transmission planning process in order to comply with the interregional requirements of Order No. 1000. Order No. 1000 requires an exchange of transmission planning data and information and does not dictate the specific type of transmission planning data and information, nor does it require the exchange of stability models.¹⁰⁰ We also note Florida Filing Parties-SERTP Filing Parties' statement that, while power-flow models and associated data will be provided automatically each year, the proposal enables transmission providers with the means to request additional transmission-based models and data if needed, and the transmission planning regions are free to make such requests for additional transmission-based models and data. In addition, SERTP Filing Parties state that the regions exchange transmission-related data and planning information regularly through SERC, the Eastern Interconnection Reliability Assessment Group, the Multi-Regional Modeling Working Group, and other reliability-related processes.

67. We disagree with FMPA/Seminole that the Florida Filing Parties-SERTP Filing Parties do not include a procedure for sharing information regarding regional transmission needs. Order No. 1000 requires each public utility transmission provider, through its regional transmission planning process, to establish further procedures with each neighboring transmission planning region to coordinate and share the results of their

⁹⁸ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.1; FP&L, FPL OATT, Attachment K-1 (0.0.0), § 2.1; Southern Companies, OATT, Ex. K-4 (0.0.0), § 2.1 and Ex. K-7, § 2.1.

⁹⁹ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.1; Southern Companies, OATT, Ex. K-7 (0.0.0), § 2.1.

¹⁰⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396.

respective regional transmission plans to identify possible interregional transmission facilities that could address transmission needs more efficiently or cost-effectively than separate regional transmission facilities.¹⁰¹ Florida Filing Parties-SERTP Filing Parties comply with this requirement by proposing procedures to exchange biennially their respective regional transmission plans, which will include information about their respective regional needs and the proposed regional solutions to those needs.

68. We disagree with Four Public Interest Organizations' concern that the proposed phrase "as necessary and if requested" for data exchange to occur between transmission providers is open to interpretation and does not ensure data necessary for joint identification and evaluation will be shared between regions absent criteria around which to base related decisions. We agree with SERTP Joint Answering Parties that this phrase allows neighboring transmission planning regions the flexibility to determine the type and quantity of additional information to be provided under a given set of circumstances without having to determine in advance what those circumstances are or the type of data to be exchanged.

69. With respect to the requirement to identify potential interregional transmission facilities, South Carolina- SERTP Filing Parties propose to review one another's then-current regional and local transmission plans to identify any potential interregional transmission facility that could be more efficient or cost-effective than projects included in the regional or local plans.¹⁰² If transmission providers in the SCRTP or SERTP regions identify a potential interregional transmission facility that could be more efficient or cost-effective than those transmission facilities included in their regional or local plans, the neighboring transmission planning regions will jointly evaluate the potential project.¹⁰³ We note that while Order No. 1000 required each public utility transmission provider to explain in its OATT how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation,¹⁰⁴ Order No. 1000 did not require public utility transmission providers to independently identify interregional transmission facilities. Thus, South Carolina- SERTP Filing Parties have proposed to go beyond this requirement of Order No. 1000. We find that the South Carolina-SERTP Filing Parties filings provide a clear process for identifying potential interregional

¹⁰¹ *Id.* P 493.

¹⁰² *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.1; Southern Companies, OATT, Ex. K-7 (0.0.0), § 3.1.

¹⁰³ *E.g., id.*

¹⁰⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

transmission facilities that could address regional transmission needs more efficiently or cost-effectively than regional transmission facilities. We also find reasonable the South Carolina-SERTP Filing Parties proposal to identify potential interregional transmission facilities that could be more efficient or cost-effective than transmission projects included in their *local* transmission plans, in addition to transmission projects included in their *regional* transmission plans.¹⁰⁵ While Order No. 1000 explicitly requires public utility transmission providers in neighboring transmission planning regions to establish procedures to coordinate and share the results of regional transmission plans to identify possible interregional transmission facilities that could address transmission needs more efficiently or cost effectively than separate *regional* transmission facilities,¹⁰⁶ we find that the South Carolina-SERTP Filing Parties proposal is consistent with Order No. 1000.¹⁰⁷

70. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose nearly identical tariff provisions to comply with the requirement to identify potential interregional transmission facilities. However, Florida Filing Parties-SERTP Filing Parties propose to review each other's then-current regional transmission plans to identify potential interregional transmission facilities that could be "more efficient *and* cost-effective" than projects included in their regional transmission plans. Order No. 1000 requires neighboring transmission planning regions to enhance their regional transmission planning processes to provide for "the identification and joint evaluation of interregional transmission facilities that may be more efficient *or* cost-effective solutions" to regional needs.¹⁰⁸ We therefore direct Tampa Electric, FP&L, Duke Florida, and SERTP Filing Parties to make this correction in their OATTs in a further compliance filing. Likewise, Orlando Commission should also submit a further compliance filing to address this issue.

¹⁰⁵ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.1; Southern Companies, OATT, Ex. K-7 (0.0.0), § 3.1.

¹⁰⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396.

¹⁰⁷ *Id.* P 399 ("our requirement is for public utility transmission providers to consider whether the local and regional transmission planning processes result in transmission plans that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions.").

¹⁰⁸ *Id.* P 396 (emphasis added).

71. We disagree with FMPA/Seminole's protest that the Florida Filing Parties-SERTP Filing Parties compliance filing lacks an affirmative attempt to identify potential interregional transmission facilities that may be more efficient or cost-effective. Order No. 1000 requires public utility transmission providers to identify interregional transmission facilities through their individual regional transmission planning processes and does not require them to conduct an independent interregional analysis to identify potential interregional transmission facilities. Instead, public utility transmission providers, through their regional transmission planning processes, may rely exclusively on proposals from transmission developers and stakeholders proposed in the regional transmission planning processes as their means to identify more efficient or cost-effective interregional transmission solutions to regional transmission needs.¹⁰⁹ However, Florida Filing Parties-SERTP Filing Parties propose to review one another's then-current regional and local transmission plans to identify interregional transmission facilities. We find that Florida Filing Parties-SERTP Filing Parties' compliance proposal meets and exceeds these requirements, except for their proposed "more efficient *and* cost-effective" language, as explained above.

72. We also dismiss Four Public Interest Organizations' contention that *procedures* for joint identification of interregional transmission facilities are vague and undefined in the proposal. We agree with SERTP Joint Answering Parties that the Order No. 1000 interregional transmission coordination requirements only necessitate joint evaluation, not joint identification of interregional transmission facilities.

73. Consistent with Order No. 1000's requirement to identify interregional transmission facilities, we accept the provisions in Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' OATTs that provide the ability for stakeholders and transmission developers to propose interregional transmission facilities and for the public utility transmission providers to use those proposals, along with their own professional judgment, to identify possible interregional transmission facilities that could address transmission needs more efficiently or cost-effectively than separate regional transmission facilities. However, the Commission required the developer of an interregional transmission facility to first propose its interregional transmission facility in the regional transmission planning processes of each of the neighboring regions in which the transmission facility is proposed to be located, which will trigger the procedure under which the public utility transmission providers, acting through their regional transmission planning process, will jointly evaluate the proposed interregional transmission project. While we accept the proposals to rely on the regional transmission planning processes as the forum for stakeholders and transmission developers to propose interregional

¹⁰⁹ *See supra* n.45.

transmission facilities for joint evaluation, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties have not explained how a proponent of an interregional transmission facility may seek to have its interregional transmission facility jointly evaluated by Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties by submitting the interregional transmission facility into the respective regional transmission planning processes. Accordingly, we direct Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties to submit, within 60 days of the date of issuance of this order, further compliance filings that include proposed revisions to their respective tariffs to satisfy these requirements.

ii. Procedure for Joint Evaluation

74. In Order No. 1000, the Commission required each public utility transmission provider to establish procedures with each of its neighboring transmission planning regions in its interconnection to jointly evaluate interregional transmission facilities.¹¹⁰ The submission of an interregional transmission project in each regional transmission planning process will trigger the procedure under which the public utility transmission providers, acting through their regional transmission planning processes, will jointly evaluate the proposed transmission project.¹¹¹

75. The Commission required that joint evaluation be conducted in the same general timeframe as, rather than subsequent to, each transmission planning region's individual consideration of the proposed interregional transmission project.¹¹² The Commission explained that, to meet the requirement to conduct the joint evaluation in the same general time frame, it expected public utility transmission providers to develop a timeline that provides a meaningful opportunity to review and evaluate through the interregional transmission coordination procedures information developed through the regional transmission planning process and, similarly, provides a meaningful opportunity to

¹¹⁰ Order No. 1000-A, 139 FERC ¶ 61,132 at P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396). *See also* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 435. As explained in the previous section of this order, a developer must first propose an interregional transmission project in each regional transmission planning processes in which the transmission facility is proposed to be located.

¹¹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

¹¹² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 506 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439).

review and use in the regional transmission planning process information developed in the interregional transmission coordination procedures.¹¹³

76. In addition, the Commission required that the compliance filing by public utility transmission providers in neighboring transmission planning regions include a description of the types of transmission studies that will be conducted to evaluate conditions on their neighboring transmission systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities.¹¹⁴ Additionally, the Commission directed each public utility transmission provider to develop procedures by which differences in the data, models, assumptions, transmission planning horizons, and criteria used to study a proposed interregional transmission project can be identified and resolved for purposes of jointly evaluating a proposed interregional transmission facility.¹¹⁵

(a) **Compliance Filings**

77. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that transmission providers in the FRCC and SERTP regions or in the SCRTP and SERTP regions shall act through their regional transmission planning processes to evaluate potential interregional transmission projects and determine whether the inclusion of any potential interregional transmission projects in each transmission planning region's regional transmission plan would be more efficient or cost-effective than transmission projects included in their then-current regional transmission plans.¹¹⁶

¹¹³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439. Order No. 1000 does not require that interregional transmission projects be evaluated simultaneously by both regions or in joint sessions of both regions' stakeholders. *Id.* P 438.

¹¹⁴ *Id.* P 398, order on reh'g, Order No. 1000-A, 139 FERC ¶ 61,132 at P 493. The Commission did not require any particular type of studies be conducted. *Id.* See also, e.g., SERTP First Regional Compliance Order, 144 FERC ¶ 61,054 at P 198; WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 283; *New York Independent System Operator, Inc.*, 148 FERC ¶ 61,044, at P 257 (2014).

¹¹⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 506, 510.

¹¹⁶ See e.g., FP&L, FPL OATT, Attachment K-1 (0.0.0), § 3.3; Southern Companies, OATT, Ex.K-4 (0.0.0), § 3.3. South Carolina and SERTP Filing Parties, respectively, propose to consider whether a potential interregional transmission project would be more efficient or cost-effective than transmission projects in their respective

(continued ...)

Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to make such analysis consistent with the transmission planning region's accepted transmission planning practices and methods used to produce its regional transmission plan.¹¹⁷

78. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that they may meet more than annually during the evaluation of transmission projects proposed for purposes of interregional cost allocation between FRCC and SERTP and between the SCRTP and SERTP regions.¹¹⁸ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties indicate that for new interregional proposals, the initial coordination activities will typically begin during the third quarter of the year. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that they will provide status updates for new and pending interregional transmission project proposals every six months, or as needed.¹¹⁹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties explain that these status updates will include, if applicable: (i) an update of the region's evaluation of the proposal; (ii) the latest calculation of Regional Benefits; (iii) the anticipated timeline for future assessments; and (iv) re-evaluations related to the proposal.¹²⁰ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to coordinate expected timelines and milestones associated with

then-current local transmission plans. *See e.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.3; Southern Companies, OATT, Ex. K-7 (0.0.0), § 3.3.

¹¹⁷ *See e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), § 3.3; Southern Companies, OATT, Ex. K-4 (0.0.0), § 3.3. South Carolina and SERTP Filing Parties, respectively, also propose that such analysis shall also be consistent with the methods utilized to produce each transmission planning region's respective *local* transmission plans. *See e.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 3.3; Southern Companies, OATT, Ex. K-7 (0.0.0), §3.3.

¹¹⁸ *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0); SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0); Southern Companies, OATT, Ex. K-4 (0.0.0) and Ex. K-7.

¹¹⁹ *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 1.2; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 1.2; Southern Companies, OATT, Ex. K-4 (0.0.0), § 1.2 and Ex. K-7, § 1.2.

¹²⁰ *See, e.g., id.*

the joint evaluation, study assumptions, and regional benefit calculations, as necessary between transmission planning regions.¹²¹

79. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that their proposals provide that if a transmission developer proposes an interregional transmission project in both the FRCC and SERTP regions, or in both the SCRTTP and SERTP regions, in order to be selected for purposes of interregional cost allocation in both regions, then the analysis of that project will be performed in the same manner as the analysis of the other interregional transmission projects identified by the public utility transmission providers through their interregional transmission coordination efforts described above.¹²²

80. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that the respective pair of neighboring transmission planning regions will coordinate assumptions and models, expected timelines and milestones, study assumptions and regional benefit calculations associated with the joint evaluation “to the extent possible and as needed.”¹²³

81. The Florida Filing Parties-SERTP Filing Parties proposal and South Carolina--SERTP Filing Parties proposal also provide specific circumstances under which an interregional transmission project may be removed from the FRCC and SERTP or SCRTTP and SERTP regional transmission plans for purposes of cost allocation. These circumstances include: (i) if the developer fails to meet developmental milestones; (ii) pursuant to the re-evaluation procedures specified in the regional transmission planning processes; or (iii) if the project is removed from one of the region’s regional transmission plans pursuant to the requirements of its regional transmission planning

¹²¹ *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 1.3; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 1.3; Southern Companies, OATT, Ex. K-4 (0.0.0), § 1.3 and Ex. K-7, § 1.3.

¹²² *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 3.4; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 3.4; Southern Companies, OATT, Ex. K-4 (0.0.0), § 3.4 and Ex. K-7, § 3.4.

¹²³ *See, e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), §§ 1.3, 3.3; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) §§ 1.3, 3.3; Southern Companies, OATT, E. K-4 (0.0.0), §§ 1.3, 3.3 and Ex. K-7, §§ 1.3, 3.3.

process.¹²⁴ These proposals specify that the FRCC and SERTP or SCRTP and SERTP transmission planning regions shall notify each other if an interregional transmission project or a portion thereof is likely to be and/or is removed from its regional transmission plan.¹²⁵

(b) Protests/Comments

82. Four Public Interest Organizations state that joint evaluation is a central tenet of Order No. 1000's interregional transmission coordination requirements, but they contend that the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties proposals do not include a formal procedure for joint identification and evaluation.¹²⁶ Similarly, FMPA/Seminole argue that the proposals fail to comply with Order No. 1000's directive to provide an adequate evaluation method for interregional transmission alternatives.¹²⁷ Four Public Interest Organizations maintain that the proposed procedures do not appear to include any joint evaluation process aside from slightly varying commitments "to the extent possible and as necessary" to coordinate assumptions and modeling.¹²⁸ In their view, the proposed joint evaluation involves the regions engaging in their own regional transmission planning process using assumptions that may be coordinated with the other relevant regions.¹²⁹

¹²⁴ See, e.g., FP&L, FPL OATT, Attachment K-1(0.0.0), § 4.6; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.6; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.6 and Ex. K-7 § 4.6.

¹²⁵ See, e.g., FP&L, FPL OATT, Attachment K-1(0.0.0), § 4.6.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 4.6.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.6.A and Ex. K-7 §4.6A.

¹²⁶ Four Public Interest Organizations Protest, Docket Nos. ER13-1922-000, ER13-1923-000, ER13-1928-000, ER13-1929-000, ER13-1930-000, ER13-1932-000, ER13-1935-000, ER13-1940-000, and ER13-1941-000, at 7-8 (filed Sept. 9, 2013) (hereinafter Four Public Interest Organizations Non-RTO Protest).

¹²⁷ FMPA/Seminole Protest at 16 (citing Order No. 1000, 126 FERC ¶ 61,051 at 398).

¹²⁸ Four Public Interest Organizations Non-RTO Protest at 9.

¹²⁹ *Id.*

83. FMPA/Seminole state that the deadlines for the interregional transmission planning process proposed by Florida Filing Parties-SERTP Filing Parties are vague and confusing.¹³⁰ FMPA/Seminole include the following components of the proposed OATT language as examples: FRCC and SERTP representatives will meet no less than once per year;¹³¹ FRCC and SERTP will biennially review each other's current regional plans and engage in data exchange and joint evaluation;¹³² initial coordination activities regarding new interregional proposals will occur during the third quarter of the year;¹³³ status updates will occur every six (6) months, or as needed;¹³⁴ the exchange of certain data used in the regional transmission planning processes will occur at least annually and typically by the beginning of each region's transmission planning cycle;¹³⁵ the initial evaluation of interregional transmission projects will begin typically during the third quarter of the year;¹³⁶ and the interregional cost allocation projects will be submitted in the timeframes outlined in the regional transmission planning processes.¹³⁷ Thus, FMPA/Seminole contend that the clear and discrete timelines that are necessary for meaningful coordination are missing from the interregional plan, just as they are missing from Florida Filing Parties-SERTP Filing Parties' regional plans.¹³⁸

84. FMPA/Seminole assert that the change of the review of regional plans and the data exchange and joint evaluation from an annual to a biennial review, after the issuance of a previous "strawman" proposal is troubling. They assert that under the proposal, FRCC and SERTP will engage in half as many transmission planning cycles as proposed in the

¹³⁰ FMPA/Seminole Protest at 19.

¹³¹ *Id.* at 20 (citing Attachment N-2 – SERTP, § 2).

¹³² *Id.* (citing Attachment N-2 – SERTP, § 1.1).

¹³³ *Id.* (citing Attachment N-2 – SERTP, § 1.2).

¹³⁴ *Id.*

¹³⁵ *Id.* (citing Attachment N-2 – SERTP, § 2.1).

¹³⁶ *Id.* (citing Attachment N-2 – SERTP, § 3.4).

¹³⁷ *Id.* (citing Attachment N-2 – SERTP, § 4.1.C).

¹³⁸ *Id.* (citing SERTP Regional Rehearing and Compliance Order, 147 FERC ¶ 61,241.

previous strawman proposal.¹³⁹ FMPA/Seminole state that, to adhere to Order No. 1000's interregional planning requirements, annual review and exchanges are preferred but FMPA/Seminole state that after several years Florida Filing Parties-SERTP Filing Parties can seek to change to a biennial process.¹⁴⁰

85. FMPA/Seminole state that the Florida Filing Parties-SERTP Filing Parties proposal also fails to comply with Order No. 1000's directive to provide an adequate evaluation method for interregional transmission alternatives, since the proposal does not "include a description of the type of transmission studies that will be conducted to evaluate conditions on their neighboring systems for the purpose of determining whether the interregional transmission facilities are more efficient or cost-effective than regional facilities."¹⁴¹ Instead, FMPA/Seminole state that Florida Filing Parties-SERTP Filing Parties defer to their regional transmission processes and that simply cross-referencing these regional processes cannot satisfy Order No. 1000 requirements, particularly because no Commission-approved regional transmission planning method is in effect in either the FRCC or SERTP transmission planning regions.¹⁴²

86. In addition, Four Public Interest Organizations are concerned that the compliance proposals lack procedures for identifying and resolving differences in data.¹⁴³ Four Public Interest Organizations state that Order No. 1000 requires transmission providers to "develop procedures by which such differences can be identified and resolved for purposes of jointly evaluating the proposed interregional transmission facility."¹⁴⁴ Four Public Interest Organizations argue that the Florida Filing Parties-SERTP Filing Parties and the South Carolina-SERTP Filing Parties proposals contain no specifics regarding how differences in data will be handled as part of joint evaluation and interregional transmission coordination besides language stating that assumptions and modeling will be coordinated.¹⁴⁵ Four Public Interest Organizations also contend that the Florida Filing

¹³⁹ *Id.* at 20-21.

¹⁴⁰ *Id.* at 21.

¹⁴¹ *Id.* at 16 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398).

¹⁴² *Id.*

¹⁴³ Four Public Interest Organizations Non-RTO Protest at 9.

¹⁴⁴ *Id.* at 11-12.

¹⁴⁵ *Id.* at 9.

Parties-SERTP Filing Parties and the South Carolina-SERTP Filing Parties proposals state that “[t]o the extent possible and as needed, assumptions and models will be coordinated,”¹⁴⁶ which is too vague and fails to ensure a minimum level of coordination for purposes of joint evaluation. Similarly, FMPA/Seminole state that proposed OATT language regarding coordination assumptions for joint evaluation, such as expected timelines/milestones, study assumptions, and regional benefit calculations, is not in harmony with the procedures required by Order No. 1000 which allow regional differences to be identified and resolved.¹⁴⁷

87. FMPA/Seminole assert that the Florida-Georgia Interface is critical to the reliability of both the FRCC and SERTP transmission planning regions and provides economic benefits to both, so it should be assessed, evaluated, and included as part of the planning of both transmission planning regions.¹⁴⁸ FMPA/Seminole also state that Florida Filing Parties-SERTP Filing Parties offer no description of how the existing Florida Interface Agreements¹⁴⁹ will interact with and accommodate the proposed interregional process, noting that the Florida Interface Agreements contain provisions and processes that are quite different from, and may present obstacles to, the Order No. 1000 interregional transmission planning process.¹⁵⁰ FMPA/Seminole state that Florida Filing Parties-SERTP Filing Parties should: (1) explain how the proposed interregional process and joint evaluation of non-incumbent projects will accommodate the Florida Interface Agreements and (2) clarify how the Florida Interface Agreements’ provisions for assigning increases and decreases in import or export capability will accommodate Order No. 1000’s requirements for allocating, through the regional process, the region’s costs

¹⁴⁶ *Id.* at 12 (citing FP&L, FPL OATT, Attachment K-1 (0.0.0), § 3.3; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), §3.3; Southern Companies, OATT, Ex. K-4 (0.0.0), § 3.3 and Ex. K-7, § 3.3).

¹⁴⁷ FMPA/Seminole Protest at 18-19 (citing Order No. 1000, 126 FERC ¶ 61,051 at 437).

¹⁴⁸ *Id.* at 8.

¹⁴⁹ FMPA/Seminole assert that each side of the Florida-Georgia Interface is governed by complex contractual arrangements. On the Florida side, they contend that a series of multi-party agreements govern the allocation of the Interface’s import and export capability, as it may change over time. On the Georgia side, they contend that planning for and allocation of Interface capability is governed by Integrated Transmission System Agreements (Florida Interface Agreements). *Id.* at 8-9.

¹⁵⁰ *Id.*

and benefits of interregional transmission facilities selected for interregional cost allocation.¹⁵¹

88. FMPA/Seminole specifically state that Florida Filing Parties-SERTP Filing Parties should explain how the provisions of the Florida Interface Agreements allow for and accommodate non-incumbent-planned transmission facilities selected through the interregional transmission planning process, the identification of benefits of proposed interregional transmission projects, and the allocation of the associated costs and benefits through the interregional and regional transmission planning processes.¹⁵²

FMPA/Seminole also question whether section 8.1 of the Import Allocation Agreement¹⁵³ requires an additional negotiation requirement beyond the procedures set forth in the Order No. 1000 interregional process. They further question how a non-incumbent transmission provider that is not an entity in Peninsular Florida is treated under this provision.¹⁵⁴

(c) **Answers**

89. In response to Four Public Interest Organizations' concerns, SERTP Joint Answering Parties argue that the Commission did not define joint evaluation as a single evaluation with one set of evaluation criteria and one outcome applicable to both regions. Rather, SERTP Joint Answering Parties argue that Order No. 1000 in no way requires that the process for jointly identifying and evaluating potential interregional transmission projects be entirely separate from the project identification and evaluation procedures already in place at the regional level, and actually requires the utilization of the regional transmission planning process.¹⁵⁵

¹⁵¹ *Id.* at 10.

¹⁵² *Id.*

¹⁵³ Section 8.1 of the Import Allocation Agreement provides for negotiations with “any entity in Peninsular Florida, not party to [the] Agreement” to establish a point of interconnection to a control area outside Florida regarding an agreement to allocate any additional import capability.

¹⁵⁴ FMPA/Seminole Protest at 10.

¹⁵⁵ SERTP Joint Answering Parties assert that the Commission explained that “[t]he submission of the interregional transmission project in each regional transmission planning process will trigger the procedure under which the public utility transmission providers acting through their regional transmission planning process will jointly evaluate

(continued ...)

90. SERTP Joint Answering Parties further contend that the approach proposed by Four Public Interest Organizations is not efficient, arguing that even if there were a joint evaluation with one set of criteria, such joint evaluation would have to be repeated by each region evaluating the project utilizing its own criteria to determine whether to proceed with the project.¹⁵⁶

91. SERTP Joint Answering Parties contend that their proposed tariff provisions include a process pursuant to which the applicable transmission planning regions will coordinate the assumptions and data that will be used when jointly evaluating an interregional transmission project. SERTP Joint Answering Parties assert that for both SCRTP and FRCC proposals, this includes coordination of expected timelines and milestones, study assumptions, and regional benefit calculations that will be used when jointly evaluating an interregional transmission project.¹⁵⁷

92. Additionally, SERTP Joint Answering Parties argue that Four Public Interest Organizations fail to recognize that the proposal's use of terms such as "as necessary" and "as needed" with regard to data coordination provides SERTP and neighboring transmission planning regions with flexibility to coordinate joint evaluation activities as circumstances dictate. SERTP Joint Answering Parties assert that their proposal allows a workable and efficient process that ensures a coordinated approach to selecting interregional transmission projects for purposes of cost allocation.¹⁵⁸

93. SERTP Joint Answering Parties argue that Four Public Interest Organizations incorrectly claim that there are no procedures for identifying and resolving differences in data. SERTP Joint Answering Parties assert that they and neighboring transmission planning regions have taken a proactive approach to harmonization of data that will be used in joint evaluation, and will use coordinated data and assumptions, making any need to resolve any differences of data unlikely.¹⁵⁹

the proposed transmission project." SERTP Joint Answer at 8-9 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

¹⁵⁶ *Id.* at 9.

¹⁵⁷ *Id.* at 18.

¹⁵⁸ *Id.* at 20.

¹⁵⁹ *Id.* at 19.

94. Finally, SERTP Joint Answering Parties state that Order No. 1000 does not require a dispute resolution procedure specifically for disputes regarding data and assumptions used in interregional transmission project evaluation, as requested by Four Public Interest Organizations. SERTP Joint Answering Parties claim that if such a dispute should occur, each region already has dispute resolution procedures, which can be deployed if necessary.¹⁶⁰

95. In response to FMPA/Seminole's argument that Florida Filing Parties-SERTP Filing Parties do not describe how the Florida Interface Agreements will interact with and accommodate the proposed interregional process, Florida Answering Parties argue that the identified agreements require no special treatment or consideration, since they are a small number of contracts that address the interconnected operation of the various systems that comprise the Eastern Interconnection. Florida Answering Parties explain that the Commission did not require that each regional transmission planning process describe how existing intra-regional or interregional interconnection agreements might interact with the Order No. 1000 process.¹⁶¹

96. Florida Answering Parties assert that the Florida Interface Agreements referenced by FMPA/Seminole are outside the scope of this proceeding and do not violate nor act as barriers to any principles or policies reflected in Order No. 1000. Florida Answering Parties assert further that Order No. 1000 is a rule relating to new transmission development, not existing facilities.¹⁶² Florida Answering Parties make similar assertions in response to FMPA/Seminole's inquiries regarding Florida Interface Agreements and clarify that an attempt to develop an interregional cost allocation approach that considers every single type of impact (adverse and beneficial) on an affected system would lead to endless litigation and would be next to impossible to achieve.¹⁶³ Florida Answering Parties assert that the provisions in the Florida Interface Agreements regarding the allocation of increases and decreases in capacity allocations do not relate to Florida Filing Parties-SERTP Filing Parties' proposal for FRCC evaluation of proposed interregional transmission facilities.¹⁶⁴

¹⁶⁰ *Id.* at 20.

¹⁶¹ Florida Answering Parties Answer at 37.

¹⁶² *Id.* at 38.

¹⁶³ *Id.* at 39.

¹⁶⁴ *Id.* at 39-40.

(d) Commission Determination

97. We find that the Florida Filing Parties-SERTP Filing Parties and the South Carolina-SERTP Filing Parties proposals partially comply with the joint evaluation requirements of Order No. 1000. Accordingly, we direct South Carolina, SERTP Filing Parties, Tampa Electric, FP&L, and Duke Florida to submit further compliance filings, as explained further below. Likewise, Orlando Commission should also submit a further compliance filing.

98. Specifically, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to review their regional transmission plans, and if potentially more efficient or cost-effective interregional transmission facilities are identified through this review, then Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will engage in joint evaluation of such transmission facilities.¹⁶⁵ After coordinating the assumptions that Florida-Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will use in their regional evaluations, the public utility transmission providers in the FRCC and SERTP or SCRTP and SERTP regions will evaluate through their regional processes whether the proposed interregional transmission facility would be a more efficient or cost-effective solution than transmission facilities included in their existing regional transmission plans. Thus, we find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties established procedures to jointly evaluate interregional transmission facilities and comply with, and go beyond, this requirement of Order No. 1000.

99. We find that the two pairs of neighboring transmission planning regions (i.e., FRCC and SERTP or SCRTP and SERTP) have developed a timeline to ensure that neighboring transmission planning regions conduct joint evaluation of a proposed interregional transmission facility, in the same general timeframe as each transmission planning region's individual consideration of a proposed interregional transmission facility, as required by Order No. 1000.¹⁶⁶ Specifically, we find that by memorializing that: (1) initial coordination activities regarding new interregional transmission facility proposals will typically begin during the third quarter of the year and (2) Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will exchange

¹⁶⁵ *See, e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), § 3.1; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 3.1; Southern Companies, OATT, Ex. K-4 (0.0.0), § 3.1 and Ex. K-7, § 3.1.

¹⁶⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439. Order No. 1000 does not require that interregional transmission projects be evaluated simultaneously by both regions or in joint sessions of both regions' stakeholders. *Id.* P 438.

status updates for new interregional transmission facility proposals or those under consideration every six months, or as needed, satisfy the Commission's expectation provided in Order No. 1000 that in developing a timeline to conduct joint evaluations, such timeline will provide a meaningful opportunity to review and evaluate through the interregional transmission coordination procedures information developed through the regional transmission planning process.¹⁶⁷ Moreover, biennial (or as needed) updates will also allow for evaluation of information developed through the regional transmission planning process, as the updates will include information regarding the interregional transmission facilities to be evaluated, analyses performed, and the results of such analyses.¹⁶⁸

100. However, we agree with FMPA/Seminole and find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties do not indicate the type of transmission studies that will be conducted to evaluate conditions on neighboring transmission systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities, as required by Order No. 1000.¹⁶⁹ Although Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties generally cross-reference the relevant regional transmission planning processes throughout their compliance filings, there is no description of the type of transmission studies that will be conducted. While the Commission does not require any particular type of study to be conducted, it does require public utility transmission providers to, at a minimum, indicate the type of transmission studies that will be conducted to evaluate conditions on neighboring transmission systems for the purpose of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities. We, therefore, direct South Carolina, SERTP Filing Parties, Tampa Electric, FP&L, and Duke Florida to submit further compliance filings within 60 days of the date of issuance of this order listing either the type of transmission studies that will be conducted or cross references to the specific provisions in the tariffs that reference such studies at the regional transmission planning level. Likewise, Orlando Commission should also submit a further compliance filing.

¹⁶⁷ *Id.* P 439.

¹⁶⁸ See FP&L, FPL OATT, Attachment K-1 (0.0.0), § 1.2; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 1.2; Southern Companies, OATT, Ex. K-4 (0.0.0), §1.2, Ex. K-7, §1.2.

¹⁶⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398.

101. We find that the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties proposed procedures by which differences in the data, models, assumptions, planning horizons, and criteria used to study a proposed interregional transmission facility can be identified and resolved for purposes of jointly evaluating a proposed interregional transmission facility comply with Order No. 1000. We find that both interregional proposals explain that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will coordinate assumptions used in joint evaluations, as necessary, including expected timelines/milestones associated with the joint evaluation, study assumptions, and regional benefit calculations.¹⁷⁰ The proposals also state that, at least annually, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties will exchange power-flow models and associated data used in their regional transmission planning processes. In addition, they may exchange additional transmission-based models and data as necessary and if requested.

102. We dismiss arguments that the provisions regarding data exchange and identification of interregional transmission facilities proposed by Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties lack procedures for identifying and resolving differences in data, models, assumptions, planning horizons and criteria. The Commission directed each public utility transmission provider, through its transmission planning region, to develop procedures by which such differences can be identified and resolved for purposes of jointly evaluating the proposed interregional transmission facility. However, it left each pair of neighboring transmission planning regions discretion in the way this requirement was designed and implemented, and did not require that any particular planning horizons or criteria be used.¹⁷¹

103. We dismiss Four Public Interest Organizations' argument that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals lack specific procedures for dispute resolution relating to coordination. Disputes concerning interregional transmission planning issues may be resolved consistent with the dispute resolution process contained in the Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' respective OATTs. We find this information provides a sufficient process to identify and resolve disputes in implementing the interregional transmission coordination requirements for data exchange.

¹⁷⁰ See FP&L, FPL OATT, Attachment K-1(0.0.0), § 1.3; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 1.3; Southern Companies, OATT, Ex.K-4 (0.0.0), §1.3, Ex. K-7, §1.3.

¹⁷¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437.

104. We also disagree with Four Public Interest Organizations that the proposed language providing that “[t]o the extent possible and as needed, assumptions and models will be coordinated” is too vague and possibly limits the coordination of joint evaluation. We agree with SERTP Joint Answering Parties that this phrase allows neighboring transmission planning regions with the flexibility to determine the type and quantity of additional information to be provided under a given set of circumstances without having to determine in advance what those circumstances are or the type of data to be exchanged.

105. We also find FMPA/Seminole’s concerns over the impact Order No. 1000 interregional transmission planning on existing agreements governing Florida interface agreements to be misplaced and outside the scope of this proceeding. While transmission planning in such regions could occur under the Order No. 1000 interregional transmission planning process, it is not a requirement.

iii. Transparency and Stakeholder Participation

106. The Commission required public utility transmission providers, either individually or through their transmission planning region, to maintain a website or e-mail list for the communication of information related to interregional transmission coordination procedures.¹⁷² While public utility transmission providers may maintain such information on an existing public utility transmission provider’s website or a regional transmission planning website, the information must be posted in a way that enables stakeholders to distinguish between information related to interregional transmission coordination and information related to regional transmission planning.¹⁷³

107. In order to facilitate stakeholder involvement, the Commission required public utility transmission providers, “subject to appropriate confidentiality protections and [Critical Energy Infrastructure Information] requirements,” to “make transparent the analyses undertaken and determinations reached by neighboring transmission planning regions in the identification and evaluation of interregional transmission facilities.”¹⁷⁴ The Commission also required that each public utility transmission provider describe in its OATT how the regional transmission planning process will enable stakeholders to

¹⁷² *Id.* P 458.

¹⁷³ *Id.*

¹⁷⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at P 520 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 465 n.365).

provide meaningful and timely input with respect to the consideration of interregional transmission facilities.¹⁷⁵

(a) **Compliance Filings**

108. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to post procedures for coordination and joint evaluation on their regional transmission planning region websites.¹⁷⁶ They propose that access to the data utilized will be made available through the regional transmission planning region websites, subject to the appropriate clearance (such as Critical Energy Infrastructure Information (CEII) and confidential non-CEII). Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to notify the transmission providers in the relevant transmission planning regions of such posting.¹⁷⁷ South Carolina-SERTP Filing Parties propose to post their local transmission plans on their websites, pursuant to their regional transmission planning processes.¹⁷⁸ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that these data be considered CEII for the public utility transmission providers in their pair of neighboring transmission planning regions.¹⁷⁹

109. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to make available, on their regional transmission planning websites, links for stakeholders to register (if applicable/available) for the stakeholder committees or

¹⁷⁵ *Id.* P 522.

¹⁷⁶ *See e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), § 5.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 5.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 5.A and Ex. K-7, § 5.A.

¹⁷⁷ *See, e.g.*, FP&L, FPL OATT, Attachment K-1(0.0.0), §§ 2.1, 2.2; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), §§ 2.1, 2.2; Southern Companies, OATT, Ex. K-4 (0.0.0), §§ 2.1, 2.2 and Ex. K-7, §§ 2.1, 2.2.

¹⁷⁸ *See, e.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 2.2; Southern Companies, OATT, Ex. K-7 (0.0.0), § 2.2.

¹⁷⁹ *See, e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 2.1; Southern Companies, OATT, Ex. K-4, § 2.1 (0.0.0), and Ex. K-7, § 2.1; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0) § 2.1.

distribution lists of the transmission planning regions.¹⁸⁰ They also propose to provide status updates of the interregional transmission planning activities during their regional transmission planning meetings, including facilities to be evaluated, analysis performed, determinations, and results.¹⁸¹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that stakeholders will have an opportunity to provide input and feedback within the regional transmission planning process related to interregional transmission facilities identified, analysis performed, and any determinations and results. They also propose that stakeholders may participate in either or both neighboring transmission planning regions' regional transmission planning processes to provide their input and feedback regarding interregional transmission coordination between the relevant transmission planning regions.¹⁸²

(b) **Protests/Comments**

110. Four Public Interest Organizations note that while both the Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties proposals state that updates will describe: “(i) facilities to be evaluated; (ii) analysis performed; and (iii) determinations/results,”¹⁸³ both proposals lack specifics. Four Public Interest Organizations believe that the transparency aspects of the compliance proposals are insufficient to comply with Order No. 1000's obligations and should be strengthened. They propose that: (1) each region should be required to post all of the studies and documents (subject to CEII and other confidentiality requirements) related to interregional transmission projects; (2) status updates should be provided at each stakeholder meeting regarding interregional transmission projects under construction

¹⁸⁰ See *e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 5.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 5.B; Southern Companies, OATT, Ex.K-4 (0.0.0), § 5.B, Ex. K-7, § 5.B.

¹⁸¹ See, *e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 5.C; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 5.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 5.C, Ex. K-7, § 5.C.

¹⁸² See, *e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 5.D; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 5.D; Southern Companies, OATT, Ex. K-4 (0.0.0), § 5.D and Ex. K-7, § 5.D.

¹⁸³ Four Public Interest Organizations Non-RTO Protest at 15 (citing *e.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 5.C; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 5.C; Southern Companies, OATT, Ex.K-4 (0.0.0), § 5.C and Ex. K-7, § 5.C.

throughout the planning cycle; (3) the ability of stakeholders to access shared data should be made explicit; and (4) summaries of the status updates provided at the stakeholder meetings should be posted on all of the regions' websites.¹⁸⁴

111. FMPA/Seminole state that Florida Filing Parties-SERTP Filing Parties cannot rely on the posting of transmission needs on a website since Order No. 1000 required additional procedures that provide for the sharing of information.¹⁸⁵

(c) Answers

112. SERTP Joint Answering Parties assert that exchanging all or virtually all information involved in regional transmission planning would be cumbersome for both the region providing the information and the region receiving it, particularly considering such information is frequently CEII and possibly confidential non-CEII and must be protected.¹⁸⁶

113. SERTP Joint Answering Parties state that their implementation of Order No. 1000's requirements will be made in accordance with SERTP's existing planning processes that have been found to comply with Order No. 890's open, transparent, and coordination planning principles. They assert that the Commission observed "stakeholders will have the opportunity to participate fully in the consideration of interregional transmission facilities during the regional [transmission] planning process," and that stakeholder participation in the various regional transmission planning processes will enhance the effectiveness of interregional transmission coordination."¹⁸⁷ SERTP Joint Answering Parties note that SERTP stakeholders that wish to understand a neighboring transmission planning region's evaluation of an interregional facility may participate in that region's planning processes.¹⁸⁸

114. SERTP Joint Answering Parties state that while the proposal references an annual update, there will be other opportunities to provide and receive information regarding

¹⁸⁴ Four Public Interest Organizations Non-RTO Protest at 15.

¹⁸⁵ FMPA/Seminole Protest at 14 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398).

¹⁸⁶ SERTP Joint Answer at 16.

¹⁸⁷ *Id.* at 22-23 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 465).

¹⁸⁸ *Id.* at 23.

potential interregional transmission projects through the regional transmission planning processes and updates may be more frequent if circumstances dictate. SERTP Joint Answering Parties note that SERTP and its neighbors have had several years of experience under Order No. 890 and other transmission planning requirements without complaints regarding insufficient data or explanation. SERTP Joint Answering Parties assert that Four Public Interest Organizations have provided no reason to believe that SERTP or its neighbors will not be open and transparent with regard to interregional evaluation of projects.¹⁸⁹

115. In addition, SERTP Joint Answering Parties state that it is not necessary to share all data or documentation in order for regions to understand and assess each other's transmission plans; or for stakeholders to understand analysis performed and determinations made during the interregional evaluation process. SERTP Joint Answering Parties argue that Four Public Interest Organizations overlook provisions in their proposal for posting of data regarding interregional evaluations on the regional websites. In addition, SERTP Joint Answering Parties claim that posting all interregional documents is unreasonable; would serve no purpose; and would potentially confuse stakeholders by commingling relevant materials with extraneous information. Finally, SERTP Joint Answering Parties state that Four Public Interest Organizations can point to no provision of Order No. 1000 that requires such a level of transparency.¹⁹⁰

(d) Commission Determination

116. We find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals comply with the relevant transparency and stakeholder participation requirements of Order No. 1000. We find that the regional planning websites are adequate means to post information related to interregional transmission coordination procedures. We find that, by posting on their respective regional transmission planning websites information regarding interregional transmission coordination and cost allocation procedures, documents related to joint evaluation of interregional transmission facilities, and status reports on interregional transmission facilities selected for purposes of interregional cost allocation, stakeholders may distinguish between information related to interregional transmission coordination and information related to regional transmission planning.

117. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to post these data on the pertinent regional transmission planning process'

¹⁸⁹ *Id.*

¹⁹⁰ *Id.* at 24.

website, consistent with the posting requirements of the regional transmission planning processes and subject to the applicable treatment of confidential data and CEII. We find that these provisions meet the transparency requirements of Order No. 1000, by allowing transmission providers to communicate information related to the interregional transmission coordination procedures and easily access data from their neighboring transmission providers for the purposes of identifying interregional transmission facilities.

118. We also find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties provide sufficient transparency with respect to disclosing the analyses undertaken and determinations reached in identifying and evaluating interregional transmission facilities. In addition to posting on the regional transmission planning website information related to interregional transmission coordination procedures, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to provide stakeholders an opportunity, within the FRCC and SERTP or SCRTP and SERTP regional transmission planning processes, to provide input and feedback related to interregional transmission facilities identified, analysis performed, and any determinations made from the interregional transmission coordination between the FRCC and SERTP or SCRTP and SERTP transmission planning regions. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose to provide stakeholders with status updates of proposed interregional transmission facilities during those regional processes. We find that these proposals regarding transparency meet the requirements set forth in Order No. 1000.

119. Furthermore, we find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties compliance proposals adequately describe in their OATTs, each region's regional transmission planning process that will allow stakeholders to provide meaningful and timely input and feedback with respect to the consideration of interregional transmission facilities. Further, stakeholders may participate in either or both regions' regional transmission planning processes to provide input and feedback regarding the interregional transmission coordination between SERTP and SCRTP or SERTP and FRCC.

120. We disagree with Four Public Interest Organizations that the transparency aspects of the compliance proposals are insufficient to comply with Order No. 1000 and should be strengthened. As stated above, we find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties provide sufficient transparency with respect to disclosing the analyses undertaken and determinations reached in identifying and evaluating interregional transmission facilities and that requiring additional transparency, as suggested by Four Public Interest Organizations, goes beyond the requirements of Order No. 1000. We agree with SERTP Joint Answering Parties that it is not necessary to share all data or documentation for regions to understand and assess each

other's transmission plans, or for stakeholders to understand analyses performed and determinations made during the interregional evaluation process. Additionally, Four Public Interest Organizations point to no provision of Order No. 1000 that requires the suggested level of transparency. Therefore, we find Four Public Interest Organizations' protest on this issue unpersuasive.

121. We disagree with Four Public Interest Organizations that, to ensure transparency, the regions should commit to providing status updates about all interregional transmission facilities identified and under consideration, not just those that have already been chosen. Order No. 1000 requires "public utility transmission providers to make transparent the analyses undertaken and determinations reached by neighboring transmission planning regions in the identification and evaluation of interregional transmission facilities."¹⁹¹ Providing the level of transparency proposed by Four Public Interest Organizations is therefore not required under Order No. 1000.

2. Cost Allocation

122. In Order No. 1000, the Commission required each public utility transmission provider in a transmission planning region to have, together with the public utility transmission providers in its own transmission planning region and a neighboring transmission planning region in its interconnection, a common method or methods for allocating the costs of a new interregional transmission facility among the beneficiaries of that transmission facility in the two neighboring transmission planning regions in which the transmission facility is located.¹⁹² The Commission found that the method or methods for interregional transmission cost allocation used by two transmission planning regions may be different from the method or methods used by either of them for regional transmission cost allocation.¹⁹³ The Commission added that the method or methods for allocating a region's share of the cost of an interregional transmission facility may differ from the method or methods for allocating the cost of a regional facility within that region.¹⁹⁴ The Commission clarified that it would not require each transmission planning

¹⁹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 465.

¹⁹² *Id.* P 578, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 626, 634.

¹⁹³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

¹⁹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

region to have the same interregional cost allocation method or methods with each of its neighbors, but rather that each pair of transmission planning regions could develop its own approach to interregional cost allocation that satisfied both transmission planning regions' transmission needs and concerns, as long as that approach satisfied the interregional cost allocation principles.¹⁹⁵

123. The Commission required that, for an interregional transmission facility to be eligible to receive interregional cost allocation, each of the neighboring transmission planning regions in which the interregional transmission facility is proposed to be located must select the facility in its regional transmission plan for purposes of cost allocation.¹⁹⁶ The Commission clarified that, if one of the regional transmission planning processes does not select the interregional transmission facility to receive interregional cost allocation, neither the transmission developer nor the other transmission planning region may allocate the costs of that interregional transmission facility under the provisions of Order No. 1000 to the region that did not select the interregional transmission facility.¹⁹⁷

124. The Commission required each public utility transmission provider to show on compliance that its cost allocation method or methods for interregional cost allocation are just and reasonable and not unduly discriminatory or preferential by demonstrating that each method satisfies the six interregional cost allocation principles described in Order No. 1000.¹⁹⁸ The Commission took a principles-based approach because it recognized that regional differences may warrant distinctions in cost allocation methods among transmission planning regions.¹⁹⁹ The Commission recognized that a variety of methods for cost allocation, including postage stamp cost allocation, may satisfy the set of general principles.²⁰⁰ The Commission stated that the cost allocation principles do not apply to

¹⁹⁵ Order No. 1000-A, 139 FERC ¶ 61,132 at P 627 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 580).

¹⁹⁶ *Id.* PP 628, 635 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

¹⁹⁷ *Id.* P 635.

¹⁹⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

¹⁹⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 604, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

²⁰⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 605, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 683.

other new, non-Order No. 1000 transmission facilities and therefore did not foreclose the opportunity for a developer or individual customer to voluntarily assume the costs of a new transmission facility.²⁰¹ The Commission also explained that Order No. 1000 permits participant funding but not as an interregional cost allocation method.²⁰²

125. The Commission stated that, in an RTO or ISO transmission planning region, the cost allocation method or methods must be filed in the RTO or ISO OATT; while, in a non-RTO/ISO transmission planning region, the method or methods must be filed in the OATT of each public utility transmission provider in the transmission planning region.²⁰³ The Commission stated that, in either instance, such cost allocation method or methods must be consistent with the interregional cost allocation principles in Order No. 1000.²⁰⁴ The Commission noted that, if public utility transmission providers in a region or pair of regions could not agree, the Commission would use the record in the relevant compliance filing proceeding(s) as a basis to develop a cost allocation method or methods that meets the Commission's requirements.²⁰⁵

126. Interregional Cost Allocation Principle 1 specifies that the costs of a new interregional transmission facility must be allocated to each transmission planning region in which that transmission facility is located in a manner that is at least roughly commensurate with the estimated benefits of that transmission facility in each of the transmission planning regions. In determining the beneficiaries of interregional transmission facilities, transmission planning regions may consider benefits including, but not limited to, those associated with maintaining reliability and sharing reserves, production cost savings and congestion relief, and/or meeting Public Policy

²⁰¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

²⁰² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 723-729, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 718, 726-737.

²⁰³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²⁰⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

²⁰⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 607, *order on reh'g*, Order No. 1000-B, 141 FERC ¶ 61,044 at P 66.

Requirements.²⁰⁶ Interregional Cost Allocation Principle 1 precludes an allocation where the benefits received are trivial in relation to the costs to be borne.²⁰⁷

127. Order No. 1000 does not prescribe a particular definition of “benefits” or “beneficiaries.”²⁰⁸ The Commission stated in Order No. 1000-A that, “while Order No. 1000 does not define benefits and beneficiaries, it does require the public utility transmission providers in each transmission planning region to be definite about benefits and beneficiaries for purposes of their cost allocation methods.”²⁰⁹ In addition, for a cost allocation method or methods to be accepted by the Commission as Order No. 1000-compliant, the method will have to specify clearly and definitively the benefits and the class of beneficiaries.²¹⁰ A benefit used by public utility transmission providers in an interregional cost allocation method or methods must be an identifiable benefit, and the transmission facility cost allocated must be roughly commensurate with that benefit.²¹¹ The Commission stated that, once beneficiaries are identified, public utility transmission providers would then be able to identify what is the more efficient or cost-effective transmission solution or assess whether costs are being allocated at least roughly commensurate with benefits.²¹² Each regional transmission planning process must provide entities who will receive interregional cost allocation an understanding of the identified benefits on which the cost allocation is based.²¹³ Order No. 1000-A stated that public utility transmission providers in each transmission planning region, in consultation with their stakeholders, may consider proposals to allocate costs directly to generators as beneficiaries that could be subject to interregional cost allocation, but any such allocation

²⁰⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 622, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 654, 681-682, 691.

²⁰⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 639.

²⁰⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 624, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 655, 674, 676-679.

²⁰⁹ Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

²¹⁰ *Id.* P 678.

²¹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 625.

²¹² Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

²¹³ *Id.* P 746 (noting that it would occur prior to the recovery of such costs through a formula rate).

must not be inconsistent with the generator interconnection process under Order No. 2003.²¹⁴

128. Interregional Cost Allocation Principle 2 specifies that a transmission planning region that receives no benefit from an interregional transmission facility that is located in that region, either at present or in a likely future scenario, must not be involuntarily allocated any of the costs of that transmission facility.²¹⁵ All cost allocation methods must provide for allocation of the entire prudently incurred cost of a transmission project to prevent stranded costs.²¹⁶ To the extent that public utility transmission providers propose a cost allocation method or methods that consider the benefits and costs of a group of new transmission facilities and adequately support their proposal, Interregional Cost Allocation Principle 2 would not require a showing that every individual transmission facility in the group of transmission facilities provides benefits to every beneficiary allocated a share of costs of that group of transmission facilities.²¹⁷

129. The Commission clarified in Order No. 1000-A that public utility transmission providers may rely on scenario analyses in the preparation of a regional transmission plan and the selection of new transmission facilities for cost allocation.²¹⁸ Interregional Cost Allocation Principle 2 would be satisfied if a project or group of projects is shown to have benefits in one or more of the transmission planning scenarios identified by public utility transmission providers in their Commission-approved Order No. 1000-compliant cost allocation methods.²¹⁹ The Commission clarified in Order No. 1000-B that, when it made this finding, it did not intend to remove the “likely future scenarios” concept from

²¹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 760, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 680.

²¹⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 637, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 684, 689, 691.

²¹⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 640, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 685; Order No. 1000-B, 141 FERC ¶ 61,044 at P 68.

²¹⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 641.

²¹⁸ Order No. 1000-A, 139 FERC ¶ 61,132 at P 690, *order on reh’g*, Order No. 1000-B, 141 FERC ¶ 61,044 at P 70.

²¹⁹ Order No. 1000-A, 139 FERC ¶ 61,132 at P 690, *order on reh’g*, Order No. 1000-B, 141 FERC ¶ 61,044 at P 70.

transmission planning and that likely future scenarios can be an important factor in public utility transmission providers' consideration of transmission projects and in the identification of beneficiaries consistent with the cost causation principle.²²⁰

130. Interregional Cost Allocation Principle 3 specifies that, if a benefit-to-cost threshold ratio is used to determine whether an interregional transmission facility has sufficient net benefits to qualify for interregional cost allocation, the ratio must not be so large as to exclude a transmission facility with significant positive net benefits from cost allocation.²²¹ Public utility transmission providers located in the neighboring transmission planning regions may choose to use such a threshold to account for uncertainty in the calculation of benefits and costs.²²² If adopted, such a threshold may not include a ratio of benefits to costs that exceeds 1.25 unless the pair of regions justify and the Commission approves a higher ratio.²²³

131. The Commission stated that Interregional Cost Allocation Principle 3 did not require the use of a benefit-to-cost ratio threshold.²²⁴ The Commission did not specify whether or how an interregional benefit-cost threshold should be applied when selecting a project in the regional transmission plan for purposes of cost allocation or which costs should be included when calculating a benefit-cost threshold to use in this selection process.²²⁵ However, if a transmission planning region chooses to have such a threshold, Interregional Cost Allocation Principle 3 limited the threshold to one that is not so high as to block inclusion of many worthwhile transmission projects in the regional transmission plan.²²⁶ The Commission allowed public utility transmission providers in a transmission planning region to use a lower ratio without a separate showing and to use a

²²⁰ Order No. 1000-B, 141 FERC ¶ 61,044 at P 72.

²²¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 646, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 692.

²²² *Id.*

²²³ *Id.*

²²⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 647, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at 693.

²²⁵ Order No. 1000-B, 141 FERC ¶ 61,044 at P 64.

²²⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 647, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at 693.

higher threshold if they justify it and the Commission approves a greater ratio.²²⁷ The Commission stated that, if the issue of whether any benefit-to-cost ratio threshold for an interregional transmission facility may supersede the ratio for a transmission planning region's regional transmission cost allocation should be presented on compliance, the Commission would address it then based on the specific facts in that filing.²²⁸

132. Interregional Cost Allocation Principle 4 specifies that costs allocated for an interregional transmission facility must assign costs only to the transmission planning regions in which the interregional transmission facility is located.²²⁹ Costs cannot be assigned involuntarily to a transmission planning region in which that interregional transmission facility is not located.²³⁰ However, interregional transmission coordination must identify consequences for other transmission planning regions, such as upgrades that may be required in a third transmission planning region and, if the transmission providers in the regions in which the interregional transmission facility is located agree to bear costs associated with such upgrades, then the interregional cost allocation method must include provisions for allocating the costs of such upgrades among the beneficiaries in the transmission planning regions in which the interregional transmission facility is located.²³¹ The Commission noted that, given the option for a transmission planning region in which an interregional transmission facility is not located to voluntarily be assigned costs, regions are free to negotiate interregional transmission arrangements that allow for the allocation of costs to beneficiaries that are not located in the same transmission planning region as any given interregional transmission facility.²³²

133. Interregional Cost Allocation Principle 5 specifies that the cost allocation method and data requirements for determining benefits and identifying beneficiaries for an interregional transmission facility must be transparent with adequate documentation to

²²⁷ *Id.*

²²⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 650.

²²⁹ *Id.* P 657; Order No. 1000-A, 139 FERC ¶ 61,132 at P 696.

²³⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 657, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 696.

²³¹ *Id.*

²³² Order No. 1000-A, 139 FERC ¶ 61,132 at P 629 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582).

allow a stakeholder to determine how they were applied to a proposed interregional transmission facility.²³³

134. Interregional Cost Allocation Principle 6 specifies that the public utility transmission providers located in neighboring transmission planning regions may choose to use a different cost allocation method for different types of interregional transmission facilities, such as interregional transmission facilities needed for reliability, congestion relief, or to achieve Public Policy Requirements.²³⁴ Each cost allocation method must be set out clearly and explained in detail in the compliance filing.²³⁵ If public utility transmission providers choose to have a different cost allocation method for each type of transmission facility, there can be only one cost allocation method for each type.²³⁶

a. Compliance Filings

135. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose a common interregional cost allocation method for interregional transmission projects located in the FRCC and SERTP regions or in the SCRTP and SERTP regions²³⁷ that quantifies a Regional Benefit based upon the transmission costs that each region is projected to avoid due to projects in the region's then-current regional transmission plan being displaced by the proposed interregional transmission project.²³⁸

²³³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 668.

²³⁴ *Id.* P 685.

²³⁵ *Id.*

²³⁶ *Id.* P 686, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 628. *See also* Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 581.

²³⁷ Florida Filing Parties-SERTP Filing Parties have submitted the same OATT language to reflect their common interregional cost allocation method proposal. South Carolina-SERTP Filing Parties have also submitted the same OATT language to reflect their common interregional cost allocation method proposal. While the interregional cost allocation method proposals submitted by Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties are substantially similar, there are several differences, which we will address in this section.

²³⁸ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.2.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.2.B and Ex. K-7, § 4.2.B.

Noting that Order No. 1000 stated that interregional transmission processes should complement local and regional transmission planning processes, not replace them, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties argue that an avoided cost-only method is the most consistent with the regions' existing transmission planning processes and will not disrupt their bottom-up and integrated resource planning processes.²³⁹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties assert that the avoided cost-only method considers more efficient or cost-effective transmission solutions to satisfy system needs identified in the regional transmission and integrated resource planning processes, while other methods focus on identifying other or alternative system needs by overriding the resource solutions and decisions incorporated in bottom-up planning processes. Florida Filing Parties, and South Carolina, and SERTP Filing Parties state that the use of production cost analyses, if applied at a regional or interregional level, would disrupt integrated resource and bottom-up transmission planning if it identified different solutions to address a load-serving entity's resource needs by altering dispatch patterns, assuming an alternate set of network resources or other changes would be made to resource plans.²⁴⁰

136. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that for a transmission project to be considered for interregional cost allocation within the FRCC-SERTP regions and the SCRTP-SERTP regions the transmission project must be interregional in nature, meaning that it must: (1) be located in the FRCC and the SERTP regions or the SCRTP and SERTP regions; (2) interconnect to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional planning process; and (3) meet the criteria for transmission projects to potentially be included in the regional transmission plans for purposes of cost allocation in the FRCC and SERTP or the SCRTP and SERTP regions.²⁴¹

²³⁹ FP&L Compliance Filing, Docket No. ER13-1929-000, at 5-6, 12; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 8 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401; South Carolina Compliance Filing, Docket No. ER13-1935-000 at 8 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 368, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 511)).

²⁴⁰ FP&L Compliance Filing, Docket No. ER13-1929-000, at 11-12; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 9-10.

²⁴¹ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.A, Ex. K-7, § 4.1.A.

137. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that, on a case-by-case basis, they will consider a transmission project for interregional cost allocation that does not satisfy all of these criteria defining a transmission project as interregional in nature but that: (1) meets the threshold criteria for a transmission project proposed to be included in the regional transmission plan for purposes of cost allocation in only one of the two relevant neighboring transmission planning regions; (2) would be located in both neighboring transmission planning regions; and (3) would be interconnected to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process.²⁴² Florida Filing Parties-SERTP Filing Parties also propose a fourth criterion to be eligible for this case-by-case consideration, i.e., a transmission project must also provide significant interregional benefits (i.e., a major transmission project effectuating significant bulk transfers between the FRCC and SERTP regions).²⁴³

138. Finally, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that for a transmission project to be considered for interregional cost allocation, it must also be proposed for purposes of cost allocation in the FRCC and SERTP regions or the SCRTP and SERTP regions.²⁴⁴ South Carolina-SERTP Filing Parties propose that the transmission developer and transmission project submittal must satisfy all criteria specified in the regional transmission processes and that the proposal should be submitted in the timeframes outlined in the regional transmission planning processes.²⁴⁵ Florida Filing Parties-SERTP Filing Parties propose that, *except for the case-by-case exception for project threshold criteria identified above*, the transmission developer and project submittal must satisfy all criteria specified in the regional

²⁴² FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.B, Ex. K-7, § 4.1.B.

²⁴³ *Id.*

²⁴⁴ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.C; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C, Ex. K-7, § 4.1.C.

²⁴⁵ SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.1.C.

transmission processes and that the proposal should be submitted in the timeframes outlined in the regional transmission planning processes.²⁴⁶

139. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that each region, acting through its regional transmission planning process, will evaluate proposals to determine whether the proposed interregional transmission project addresses transmission needs that are currently being addressed with transmission projects in its regional transmission plan and, if so, which transmission projects in the regional transmission plan could be displaced by the proposed interregional transmission projects.²⁴⁷ South Carolina-SERTP Filing Parties also propose to evaluate proposals to determine whether the proposed interregional transmission project addresses transmission needs that are currently being addressed with transmission projects in a *local* transmission plan and, if so, which transmission projects in the *local* transmission plan could be displaced by the proposed interregional transmission project.²⁴⁸ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that, based on each transmission planning region's evaluation, each region will quantify a Regional Benefit based on the transmission costs that each region is projected to avoid due to its regional and/or local transmission projects being displaced by the proposed interregional transmission projects.²⁴⁹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that the Regional Benefit is the total avoided capital costs of projects included in the then-current regional and/or local transmission plans that would be displaced if the proposed interregional transmission project was included.²⁵⁰ Florida Filing Parties-SERTP Filing Parties and

²⁴⁶ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C.

²⁴⁷ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.2.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.2.A.

²⁴⁸ Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.2.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.A.

²⁴⁹ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.2.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.2.B and Ex. K-7 § 4.2.B.

²⁵⁰ SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.2.B.

South Carolina-SERTP Filing Parties propose language stating that the Regional Benefit is not necessarily the same as benefits used for purposes of regional cost allocation.²⁵¹

140. South Carolina-SERTP Filing Parties propose that each region will calculate a regional benefit-to-cost ratio consistent with its regional process and compare the ratio to its respective threshold to determine if the interregional transmission project appears to be more efficient *or* cost-effective than those projects included in its current regional and local transmission plans.²⁵² Florida Filing Parties-SERTP Filing Parties similarly propose that each region will calculate a regional benefit-to-cost ratio consistent with its regional process and compare the benefit-to-cost ratio to its respective threshold to determine if the interregional transmission project appears to be more efficient *and* cost-effective than those projects included in its current regional transmission plan.²⁵³ Under these proposals, to calculate the regional benefit-to-cost ratio, each region shall utilize the benefit calculations as defined in the region's regional transmission planning process (which are not necessarily the same as the Regional Benefits calculated using the interregional transmission coordination procedures described above).²⁵⁴ In addition, they propose that each region shall use the cost calculation as defined in each region's regional transmission planning process and the anticipated percentage allocation of costs of the interregional transmission project to each region shall be based upon the ratio of the transmission planning region's Regional Benefit to the sum of the Regional Benefits identified for the SCRTP and SERTP regions or FRCC and SERTP regions.²⁵⁵ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose to calculate the regional benefit-to-cost assessments in accordance with each

²⁵¹ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.2.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.2.B and Ex. K-7 § 4.2.B.

²⁵² SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.3; Southern Companies, OATT, Ex.K-7 (0.0.0), § 4.3.

²⁵³ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.3.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.3.A.

²⁵⁴ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), §§ 4.3, 4.2.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.3, 4.2B.

²⁵⁵ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.3B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.3B.

region's regional transmission planning process, including but not limited to subsequent calculations and re-evaluations.²⁵⁶

141. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to include an interregional transmission project proposed for interregional cost allocation in the regional transmission plans for purposes of cost allocation after each region has performed all evaluations, as prescribed in its regional transmission planning process, necessary for a project to be included in its regional transmission plan for purposes of cost allocation, including any regional benefit-to-cost ratio calculations performed pursuant to the provisions above.²⁵⁷ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose that, to be included in the regional transmission plans for purposes of cost allocation, all approvals and agreements for an interregional transmission project, as prescribed in each respective regional transmission planning process, necessary for a project to be included in the regional transmission plan for purposes of cost allocation must be obtained.²⁵⁸

142. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that the FRCC and SERTP regions or the SCRTP and SERTP regions will be allocated a portion of an interregional transmission project's costs in proportion to each region's ratio of Regional Benefits to total Regional Benefits identified by the FRCC and SERTP regions, or the SCRTP and SERTP regions.²⁵⁹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to base the Regional Benefits used for this determination on the last Regional Benefit calculation performed pursuant to the interregional transmission coordination provisions described above, before each transmission planning region included the interregional transmission project in its regional transmission plan for purposes of cost allocation and as approved

²⁵⁶ *E.g., id.*; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.3.B and Ex. K-7, § 4.3.B.

²⁵⁷ *E.g.,* FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.4.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.4.A.

²⁵⁸ *E.g.,* FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.4.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.4.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.4.B and Ex. K-7 § 4.4.B.

²⁵⁹ *E.g.,* FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.5; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.5; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5 and Ex. K-7, § 4.5.

by each transmission planning region.²⁶⁰ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties further propose that the costs allocated to each transmission planning region shall be further allocated within each region pursuant to the cost allocation method contained in each respective regional transmission planning process.²⁶¹

143. Florida Filing Parties-SERTP Filing Parties also propose an additional provision stating that, should one region be willing to bear more costs of the interregional transmission project than those costs identified pursuant to the method described above, the FRCC and SERTP regions may voluntarily agree, subject to applicable regional approvals, to an alternative cost sharing arrangement.²⁶²

144. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that an interregional transmission project may be removed from a transmission planning region's regional transmission plan for purposes of cost allocation: (1) if the developer fails to meet development milestones; (2) pursuant to the re-evaluation procedures specified in the regional transmission planning process; or (3) the interregional transmission project is removed from one of the transmission planning region's regional transmission plans pursuant to the requirements of the regional transmission planning process.²⁶³ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose the relevant transmission providers notify

²⁶⁰ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.5.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.5.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5.A and Ex. K-7§ 4.5.A.

²⁶¹ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.5.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.5.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5.B and Ex. K-7, § 4.5.B.

²⁶² *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.5.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5.C.

²⁶³ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.6; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.5.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5.B and Ex. K-7, § 4.5.B.

each other if an interregional transmission project or a portion thereof is likely to be removed from its regional transmission plan.²⁶⁴

145. South Carolina-SERTP Filing Parties propose an additional provision stating that, if an interregional transmission project is abandoned, the impacted transmission providers may seek to complete the interregional transmission project (in accordance with all applicable laws and regulations) or to propose alternative projects (including non-transmission alternatives) that will ensure that any reliability need is satisfied in an adequate manner. South Carolina-SERTP Filing Parties propose to require NERC Registered Entities to submit a mitigation plan to the appropriate entity if the NERC Registered Entity believes that abandonment will cause a specific NERC Reliability Standard to be violated, and if the transmission providers have not chosen to complete the interregional transmission project in order to prevent the violation, or if the NERC Registered Entity cannot complete such a project in a timely fashion.²⁶⁵

146. Regarding the six interregional cost allocation principles, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that the proposed avoided cost-only method meets Cost Allocation Principle 1 because costs are allocated in proportion to the quantifiable benefits of avoided/displaced transmission. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties note that in the context of cost allocation within a planning region, the Commission has found that a cost allocation that includes avoided costs “could be a reasonable approach for allocating costs in a manner that is roughly commensurate with benefits.”²⁶⁶

²⁶⁴ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.6; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.6; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.6 and Ex. K-7, § 4.6.

²⁶⁵ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.7; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.7.

²⁶⁶ Southern Companies Compliance Filing, Docket No. ER13-1941-000 at 12 (citing *Avista Corp.*, 143 FERC ¶ 61,255, at P 300 (2013) (citing *S.C. Elec. & Gas Co.*, 143 FERC ¶ 61,058, at P 232 (2013); WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 312). Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties note that the Commission specifically approved an avoided cost-only approach for allocating the cost of reliability projects within a region, finding that it “reasonably captures the benefits of such projects.” FP&L Compliance Filing, Docket No. ER13-1929-000, at 9; South Carolina Compliance Filing, ER13-1935-000 at 9; Southern Companies Compliance Filing, Docket No. ER13-1941-000 at 12 (citing WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 312).

147. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that utilizing an avoided/displaced cost allocation metric facilitates the comparison of the costs of an interregional transmission project with a project(s), which has already been determined to provide benefits to the planning region. Therefore, according to Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties, replacing an already existing project with a comparable, or a more efficient or cost-effective interregional transmission project ensures that the cost and benefits are roughly commensurate in a manner that identifies efficient or cost-effective solutions to address transmission needs.²⁶⁷

148. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties assert that an avoided cost-only method for interregional cost allocation is particularly appropriate given that Order No. 1000 requires interregional transmission coordination rather than interregional planning. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties note that under Order No. 1000-A, the Commission's interregional transmission coordination reforms do not require the establishment of interregional transmission planning processes to develop integrated interregional plans, but rather call upon public utility transmission providers to consider "whether the local and regional transmission planning processes result in transmission plans that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions."²⁶⁸ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties, therefore, assert that the purpose of interregional transmission coordination is "to determine whether an interregional [transmission] project might beneficially displace one or more projects included in regional or local plans."²⁶⁹ As a result, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties aver that "the cost of the displaced

²⁶⁷ FP&L Compliance Filing, Docket No. ER13-1929-000, at 9; Southern Companies Compliance, Docket No. ER13-1941-000 Filing, at 12; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 8-9.

²⁶⁸ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 9; FP&L Compliance Filing, Docket No. ER13-1929-000, at 9; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 12 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 511).

²⁶⁹ South Carolina Compliance Filing, Docket No. ER13-1941-000, at 9; FP&L Compliance Filing, Docket No. ER13-1929-000, at 9; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 12.

projects represents a reasonable measure of the benefits of the interregional [transmission] project” for purposes of cost allocation.²⁷⁰

149. South Carolina-SERTP Filing Parties state that the use of an avoided cost-only approach is particularly appropriate given the bottom-up transmission planning employed in the two regions. They state that the avoided cost-only method is the most consistent, if not the only, cost allocation method that is consistent with, and avoids significant disruption to, their bottom-up and Integrated Resource Planning (IRP) Process. South Carolina-SERTP Filing Parties explain that this is because the avoided cost-only method looks to see if a more efficient or cost-effective transmission solution satisfies *system need(s) identified in the IRP and other bottom-up planning* processes, as opposed to other methods that might look to identify other or alternative system needs by overriding the resource solutions and decisions incorporated in those bottom-up transmission planning processes.²⁷¹

150. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that they recognize that the Commission has found that an avoided cost-only method does not comply with the six regional cost allocation principles because such a method does not account for economic or public policy benefits. However, they argue that these findings are not determinative or relevant to their interregional filing because the avoided cost methodology captures transmission needs driven by public policy requirements and economic criteria assessed in the regional processes. They argue that Order No. 1000 does not require consideration of public policy or economic benefits to be repeated at the interregional level.²⁷² Moreover, they argue that the avoided cost-only method is appropriate since each region may choose not to select an interregional transmission project in its regional plan for cost allocation purposes if the proposed project is not cost-effective for that region.²⁷³ Florida Filing Parties-SERTP Filing

²⁷⁰ South Carolina Compliance Filing, Docket No. ER13-1935-000 at FP&L Compliance Filing, Docket No. ER13-1929-000 at *Id.* Southern Companies Compliance Filing, Docket No. ER13-1941-000, at *Id.*

²⁷¹ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 9-10.

²⁷² South Carolina Compliance Filing, Docket No. ER13-1935-000, at n.29; FP&L Compliance Filing, Docket No. ER13-1929-000, at 10; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 13.

²⁷³ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 10 (quoting Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582); FP&L Compliance Filing, Docket No. ER13-1929-000, at 10 (quoting Order No. 1000, FERC Stats. & Regs. ¶

Parties and South Carolina-SERTP Filing Parties conclude that an avoided cost-only method, which allocates the costs of an interregional transmission project in proportion to the costs of the displaced regional transmission project(s), accounts for the “essentially voluntary nature of interregional transmission coordination,” and results in a close “alignment of transmission planning and cost allocation,” which they assert was a “central underpinning” of Order No. 1000’s interregional transmission coordination reforms.²⁷⁴

151. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties assert that the proposed cost allocation method complies with Cost Allocation Principles 2 and 4 because a facility is eligible for interregional cost allocation only if it is selected in the regional transmission plan of the SERTP region *and* in the FRCC and SCRTCP regional transmission plans. In addition, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that by only allocating costs to regions that are able to avoid costs, the agreed-upon approach (i.e., the avoided cost-only method) assures that there will be no allocation to a region that does not benefit.²⁷⁵ Regarding Cost Allocation Principle 4, the Florida Filing Parties-SERTP Filing Parties and the South Carolina-SERTP Filing Parties proposals do not provide for the sharing of costs of upgrades that might be required in a region in which an interregional facility is not located.²⁷⁶

152. Specifically, according to Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties, their proposed tariff revisions provide that the costs of the interregional transmission project will only be allocated to a region that has selected

31,323 at P 582); Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 13 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 512).

²⁷⁴ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 10 (quoting Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582); FP&L Compliance Filing, Docket No. ER13-1929-000, at 10 (quoting Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582); Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 13-14 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582).

²⁷⁵ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 10-11; FP&L Compliance Filing, Docket No. ER13-1929-000, at 10; Southern Companies Compliance Filing, ER13-1941-000, at 14.

²⁷⁶ South Carolina Compliance Filing, Docket No. ER13-1935-000 at *Id.* FP&L Compliance Filing, Docket No. ER13-1929-000 at Southern Companies Compliance Filing, Docket No. ER13-1941-000 at *Id.*

the project in its regional transmission plan for purposes of cost allocation.²⁷⁷ In addition, they state that neither the Florida Filing Parties-SERTP Filing Parties nor the South Carolina-SERTP Filing Parties proposals are responsible for compensating another planning region for required upgrades or for any other consequences in another planning region associated with interregional transmission projects identified in the interregional transmission coordination process.²⁷⁸

153. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that the proposed avoided cost-only method complies with Interregional Cost Allocation Principle 3 because it does not establish a benefit-cost threshold for interregional cost allocation.²⁷⁹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that the avoided/displaced cost method satisfies this principle because the FRCC-SERTP and SCRTP-SERTP seams do not apply an interregional cost-benefit analysis.²⁸⁰ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that their proposal provides that proposed interregional cost allocation projects must be accepted in the regional processes; thus if a regional transmission planning process requires a benefit-to-cost ratio threshold, the portion of the project allocated to such region would be required to satisfy such threshold.²⁸¹ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties similarly state that each region will calculate the regional benefit-to-cost ratio consistent with its regional process and compare the benefit-to-cost ratio to its respective threshold to determine if the interregional transmission project appears to be more efficient or cost-effective than those projects included in its current regional or local transmission plans.²⁸²

²⁷⁷ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.C; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C and Ex. K-7, § 4.1.C.

²⁷⁸ FP&L Compliance Filing, Docket No. ER13-1929-000, at 10.

²⁷⁹ FP&L Compliance Filing, Docket No. ER13-1929-000, at 11; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 11; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 14.

²⁸⁰ FP&L Compliance Filing, Docket No. ER13-1929-000, at 10; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 11.

²⁸¹ FP&L Compliance Filing, Docket No. ER13-1929-000, at 11.

²⁸² South Carolina Compliance Filing, Docket No. ER13-1935-000, at 11.

154. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties assert that the proposed cost allocation method also complies with Cost Allocation Principle 5 because the benefits that form the basis of cost allocation under the avoided cost-only method are readily quantifiable, and therefore the cost allocation method and data requirements for determining benefits and identifying beneficiaries would be transparent. In addition, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties assert that there would be sufficient documentation to allow stakeholders to determine how the cost allocation method was applied to a proposed interregional transmission facility.²⁸³

155. Finally, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that the proposed cost allocation method complies with Cost Allocation Principle 6 because it would apply to all transmission facilities proposed for interregional cost allocation.²⁸⁴

b. Protests/Comments

156. Four Public Interest Organizations assert that both the Florida Filing Parties-SERTP Filing Parties and the South Carolina-SERTP Filing Parties proposals fail to meet the requirements of Order No. 1000 because: (1) they do not include an actual interregional cost allocation method and (2) the proposed avoided cost-only method fails to satisfy the first cost allocation principle of Order No. 1000, namely, that costs must be allocated in a manner roughly commensurate with benefits.²⁸⁵

157. Regarding their assertion that both proposals fail to include an actual interregional cost allocation method, Four Public Interest Organizations state that both proposals are “missing the Order No. 1000-required step in which a clearly defined interregional method is applied in the same manner by the involved regions before each region then divides its regional share according to its chosen Order No. 1000-compliance method.”²⁸⁶

²⁸³ FP&L Compliance Filing, Docket No. ER13-1929-000, at 11; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 11; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 14-15.

²⁸⁴ FP&L Compliance Filing, Docket No. ER13-1929-000, at 11; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 11; Southern Companies Compliance Filing, Docket No. ER13-1941-000, at 15.

²⁸⁵ Four Public Interest Organizations Non-RTO Protest at 15.

²⁸⁶ *Id.* at 23.

They assert that, without an interregional cost allocation method, the benefits and beneficiaries of a proposed interregional transmission project will be not captured fully.²⁸⁷ They contend that allowing each region to determine its own *pro rata* share of the costs and benefits of an interregional transmission project, instead of utilizing a shared mechanism to allocate costs roughly commensurate with benefits among the regions, may not account for all benefits and costs, fails to satisfy Order No. 1000's obligation, and will not result in just and reasonable rates and the avoidance of undue discrimination.²⁸⁸

158. Four Public Interest Organizations and FMPA/Seminole argue that the Florida Filing Parties-SERTP Filing Parties' and the South Carolina-SERTP Filing Parties' cost allocation proposals fail to sufficiently consider all of the benefits that may accrue from an interregional transmission project, and therefore do not comply with Interregional Cost Allocation Principle 1.²⁸⁹ In Four Public Interest Organizations' view, focusing only on the avoided costs of regional transmission projects oversimplifies the analysis of benefits and ignores the fact that the selected interregional transmission project may address regional transmission needs but may have "different attributes, functions, and even location than the displaced regional [transmission] projects" and, therefore, a different benefit profile than the displaced regional transmission projects.²⁹⁰ They note that the proposed cost allocation method does not consider the public policy benefits of regional transmission projects when estimating avoided costs of an interregional transmission project.²⁹¹

159. Similarly, FMPA/Seminole state that the interregional facility benefits are evaluated by each affected region based on its own regional criteria, for which the Commission rejected the avoided cost-only method as the sole basis for evaluating benefits for purposes of regional project selection.²⁹² Thus, FMPA/Seminole assert that there is no assurance that the Florida Filing Parties-SERTP Filing Parties' proposal will result in a cost allocation for interregional transmission projects that is roughly

²⁸⁷ *Id.* at 16.

²⁸⁸ *Id.*

²⁸⁹ *Id.* at 16-17; FMPA/Seminole Protest at 22-24.

²⁹⁰ Four Public Interest Organizations Non-RTO Protest at 21.

²⁹¹ *Id.*

²⁹² *Id.* at 25.

commensurate with benefits, as required by Cost Allocation Principle 1.²⁹³ FMPA/Seminole state that, as a result, individual regions may reject an interregional transmission alternative for regional cost allocation—and thus, interregional cost allocation—even if the alternative provides clear benefits for the two regions as a whole.²⁹⁴

160. FMPA/Seminole state that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' inclusion of Regional Benefit, narrowly defined as only the avoided cost of displaced regionally planned transmission facilities, cannot change the requirement to correctly consider the benefits of interregional transmission alternatives, including the benefits that must be considered on a regional level.²⁹⁵ FMPA/Seminole state that the regional needs as required by Order No. 1000 and the associated benefits for addressing those needs, not just the avoided cost of regionally planned facilities, should be the basis for selecting interregional transmission alternatives and allocating their costs.²⁹⁶

161. Additionally, Four Public Interest Organizations and FMPA/Seminole assert that the Commission has rejected an avoided cost-only approach in several regional compliance filings, including those of SERTP Filing Parties, because such an approach does not allocate costs in a manner that is roughly commensurate with benefits.²⁹⁷ Four Public Interest Organizations further assert that, while an avoided cost-only method may be appropriate when applied to reliability-driven transmission projects under certain circumstances, it is not appropriate to address all potential drivers of transmission needs at the interregional level because some benefits of the more efficient or cost-effective interregional transmission solution will not be allocated to beneficiaries. They conclude that arguing that Cost Allocation Principle 1 should be applied differently at the

²⁹³ *Id.*

²⁹⁴ *Id.*

²⁹⁵ *Id.* at 26.

²⁹⁶ FMPA/Seminole Protest at 26.

²⁹⁷ Four Public Interest Organizations Non-RTO Protest at 22 (citing SERTP First Regional Compliance Order, 144 FERC ¶ 61,054); FMPA/Seminole Protest at 25.

interregional level “amounts to a post hoc disagreement with [Order No. 1000’s] requirements for interregional cost allocation.”²⁹⁸

162. Four Public Interest Organizations also argue that the Commission rejected SERTP Filing Parties’ perspective that an avoided cost-only approach to cost allocation is “the most consistent, if not the only, cost allocation method that is consistent with, and avoids disruption to, their bottom-up and [integrated resource] planning.”²⁹⁹ Four Public Interest Organizations argue that the Commission implicitly rejected this perspective in two instances: (1) when it prohibited an avoided cost-only approach to allocation in the regional compliance filings and (2) in applying the cost allocation principles to interregional transmission coordination in the Order No. 1000 Final Rule. Four Public Interest Organizations contend that the decisions about efficient or cost-effective regional or interregional solutions to identified Commission-jurisdictional grid needs do not serve to undermine this state planning; to the contrary, they help to facilitate state resource planning priorities.³⁰⁰

163. In response to Florida Filing Parties-SERTP Filing Parties’ and South Carolina-SERTP Filing Parties’ assertion that Order No. 1000 does not require the consideration of public policy or economic benefits at the interregional level, Four Public Interest Organizations claim that Order No. 1000 does not limit the consideration of benefits at the interregional level to meeting regional reliability needs.³⁰¹ Rather, Four Public Interest Organizations state that the Commission’s intention for interregional transmission coordination “is to ensure that transmission providers can ‘identify more efficient or cost-effective solutions to the individual needs identified in their respective local and regional transmission planning processes.’”³⁰² Four Public Interest Organizations conclude that if regional transmission planning processes consider transmission needs driven by economics and public policy requirements, the interregional cost allocation method must be appropriate to apply to potential interregional transmission solutions that can more efficiently and cost effectively meet regional transmission needs (i.e., it must reasonably consider these types of benefits). Four Public

²⁹⁸ Four Public Interest Organizations Non-RTO Protest at 22-23 (citing WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 312).

²⁹⁹ *Id.* at 21.

³⁰⁰ *Id.*

³⁰¹ *Id.* at 20.

³⁰² *Id.*

Interest Organizations argue that otherwise, Order No. 1000's first cost allocation principle is violated and the Commission's intent in requiring a default interregional cost allocation method—to ensure that the most efficient or cost-effective transmission solutions to grid needs are the ones chosen in regional transmission plans – is undermined.³⁰³

164. Four Public Interest Organizations assert that the Commission's statement that, in the regional context, accounting for the costs avoided by replacing a local transmission project with a regional transmission project fails to ensure that all the benefits of the regional transmission project are captured, applies equally in the context of interregional transmission projects replacing a planned regional transmission project.³⁰⁴ Specifically, Four Public Interest Organizations state that interregional transmission projects chosen for purposes of cost allocation that may end up in separate regional plans instead of a distinct interregional plan have no bearing on the reality of the transmission project's benefits.³⁰⁵ Four Public Interest Organizations also contend that the proposals appear to only consider interregional transmission projects that displace specific regional transmission projects and effectively prohibit consideration of interregional transmission projects that would address other regional system needs for which "local or regional" projects are not currently planned.³⁰⁶

165. FMPA/Seminole assert that the sole reliance on an avoided cost-only method could be particularly pernicious with respect to the Georgia-Florida interface. FMPA/Seminole note that many of the transmission alternatives to increase transmission capability across the interface would require upgrades in both the FRCC and SERTP regions and, absent assurance that a complementary project will be proposed on the opposite side of the interface, each region will have little incentive to include such a project in its own regional transmission plan.³⁰⁷ FMPA/Seminole state that, as a result, it is unclear whether regionally planned transmission facilities would displace a potential, even highly beneficial interregional transmission project.³⁰⁸ Moreover, FMPA/Seminole

³⁰³ *Id.* at 20-21.

³⁰⁴ *Id.* at 17-18.

³⁰⁵ *Id.* at 19.

³⁰⁶ *Id.* at 9.

³⁰⁷ FMPA/Seminole Protest at 24.

³⁰⁸ *Id.*

state that, to the extent that any regional facilities are displaced, those displaced facilities may have originally been planned to serve a completely different function and there accordingly may be no relationship between the cost of those displaced facilities and the value of the regional benefits provided by the interregional transmission facility.³⁰⁹

166. FMPA/Seminole note that the Florida Filing Parties-SERTP Filing Parties proposal requires that, for a transmission project to be considered for interregional cost allocation, among other criteria, the project must be proposed for purposes of cost allocation in both SERTP and FRCC and must satisfy all criteria specified in the regional transmission processes.³¹⁰ FMPA/Seminole request clarification that, under this provision, the segment of the interregional transmission facility within each region must comply with the applicable threshold for that region, but that the line segment in FRCC does not have to meet SERTP thresholds, or vice-versa.³¹¹ FMPA/Seminole note that the thresholds could vary significantly between the two regions and it would be inappropriate to require facilities constructed in FRCC to meet the SERTP threshold requirements, which are much higher in SERTP than the smaller FRCC region.³¹²

c. Answers

167. SERTP Joint Answering Parties provide several reasons for disagreeing with Four Public Interest Organizations' argument that the avoided cost-only method does not constitute an interregional cost allocation method. First, SERTP Joint Answering Parties state that the interregional cost allocation is based on total project benefits and costs, and the fact that the individual regions may use different methods to determine their benefits within their region for purposes of regional cost allocation does not undercut the fact that this approach is a common method for interregional cost allocation.³¹³ They explain that an interregional transmission project must have been shown at the regional level to produce benefits for each region; thus, logically, each region's specific provisions addressing the determination of benefits should govern. Second, SERTP Joint

³⁰⁹ *Id.*

³¹⁰ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C.

³¹¹ FMPA/Seminole Protest at 21 (citing Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C).

³¹² FMPA/Seminole Protest at 21-22.

³¹³ SERTP Joint Answer at 26.

Answering Parties argue that the proposed interregional cost allocation method does not seek to impose a new definition of benefits or beneficiaries upon an interregional transmission project because to do so would impose interregional transmission planning on top of regional transmission planning, which is not required by Order No. 1000.³¹⁴ Third, SERTP Joint Answering Parties aver that Four Public Interest Organizations recognize that there is no requirement in Order No. 1000 that the interregional cost allocation method must be the same as the participating regions' regional cost allocation methods or that both regions must employ the same regional cost allocation method.³¹⁵

168. Florida Answering Parties-SERTP Joint Answering Parties assert that individual regions may use different methods to determine their benefits within their region for purposes of regional cost allocation, but that does not undercut the fact that the avoided cost-only approach is a common method for interregional cost allocation. Florida Answering Parties and SERTP Joint Answering Parties point out that an interregional project must have been shown at the regional level to produce benefits that are important to those within each region. Florida Answering Parties also point out that Order No. 1000 does not require that the interregional cost allocation method must be the same as the regional cost allocation methods or that both regions must employ the same regional cost allocation method.³¹⁶ Florida Answering Parties and SERTP Joint Answering Parties clarify that regions are allowed to select an interregional cost allocation method that differs from their regional cost allocation methods.³¹⁷ Florida Answering Parties and SERTP Joint Answering Parties state that beneficiaries are identified exclusively at the regional level, and that the proposed interregional cost allocation method does not seek to impose a new definition of benefits or beneficiaries upon an interregional transmission facility. Florida Answering Parties state that doing so would impose interregional planning on top of regional planning and point out that the Commission has found that Order No. 1000 does not require either interregional or interconnection-wide transmission planning.³¹⁸

³¹⁴ *See id.* at 27 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at PP 500, 711).

³¹⁵ *Id.* at 26.

³¹⁶ Florida Answering Parties Answer at 24-25; SERTP Joint Answer at 26.

³¹⁷ Florida Answering Parties Answer at 25 and SERTP Joint Answer at 26-27 (citing Order 1000, FERC Stats. & Regs. ¶ 31,323 at PP 578, 733.).

³¹⁸ Florida Answering Parties Answer at 25 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at PP 500,711).

169. SERTP Joint Answering Parties also challenge Four Public Interest Organizations' argument that the avoided cost-only method must be rejected since the Commission previously rejected the avoided cost-only method as the sole regional cost allocation method.³¹⁹ SERTP Joint Answering Parties find that this argument ignores crucial differences between Order No. 1000's regional transmission planning obligations and the interregional transmission coordination obligations. They assert that, unlike at the regional level, Order No. 1000 does not require neighboring transmission planning regions to engage in economic and public policy planning at the interregional level, and there is no obligation placed on transmission providers to identify interregional transmission needs.³²⁰

170. Contrary to Four Public Interest Organizations' argument that the avoided cost-only method will fail to capture all benefits and therefore will leave some costs unallocated to beneficiaries, SERTP Joint Answering Parties argue that a selected interregional transmission solution will necessarily capture economic and public policy transmission benefits to the extent that it is displacing a regional transmission project that has been identified to meet those transmission needs.³²¹ SERTP Joint Answering Parties also argue that the avoided cost-only method captures all "transmission needs" in that it encompasses all needs driving the physical expansion of the transmission system (i.e., transmission capacity needed to satisfy long-term firm transmission commitments) reliably. SERTP Joint Answering Parties argue that "[b]ecause the relevant and measurable benefits are captured, the avoided cost-only method meets the cost causation principle underlying the Commission's first interregional cost allocation principle, which requires the allocation of costs 'in a manner that is at least roughly commensurate with estimated benefits.'"³²² SERTP Joint Answering Parties contend that a cost allocation method does not violate the cost causation principle merely because there may be some customers who might receive some other, purported benefit from a transmission project and who do not bear a direct cost responsibility. Rather, SERTP Joint Answering Parties argue that a cost allocation method fails to meet the cost causation principle only if the omission of some other "benefits" or beneficiaries causes the resulting cost allocation not to be "roughly commensurate" with the distribution of benefits. SERTP Joint Answering Parties assert that Four Public Interest Organizations offer no analysis to support a

³¹⁹ SERTP Joint Answer at 27-28.

³²⁰ *Id.* at 28 (citing WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at PP 311-313); Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401.

³²¹ SERTP Joint Answer at 29.

³²² *Id.* at 29-30 (quoting Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 622).

finding that the ancillary benefits that they suggest may exist are so great that they cause the avoided cost-only method to fall short of the “roughly commensurate” standard.³²³

171. In response to Four Public Interest Organizations’ position that the avoided cost-only method is defective because it does not take into account instances in which a selected project may differ in some respect from the displaced regional transmission projects, SERTP Joint Answering Parties contend that this argument ignores the nature of the interregional transmission coordination process. SERTP Joint Answering Parties explain that the interregional transmission coordination process does not change the locally and regionally identified transmission needs but instead determines whether an interregional transmission project may more efficiently or cost-effectively satisfy the identified transmission needs. SERTP Joint Answering Parties contend that neither the needs that interregional transmission projects address nor the benefits have changed; instead, the transmission needs that interregional transmission projects address are being addressed in a more efficient or cost-effective manner.³²⁴

172. Florida Answering Parties and SERTP Joint Answering Parties argue that the avoided cost-only method captures all transmission needs, including all needs driving the physical expansion of the transmission system (*i.e.*, transmission capacity needed to reliably satisfy long-term firm transmission commitments), as well as all of the benefits that accrue from meeting such needs. Florida Answering Parties and SERTP Joint Answering Parties argue further that economic and public policy benefits are necessarily captured in the Order No. 1000 regional transmission plan because an interregional transmission project that is more efficient or cost-effective than local and regional projects must provide those same benefits. In response to protests, Florida Answering Parties and SERTP Joint Answering Parties contend that even if it could be demonstrated that ancillary benefits (*i.e.*, benefits not tied to any need) also would be provided, such benefits could not be readily measured and allocated, as no beneficiary has identified a related need.³²⁵ Florida Answering Parties and SERTP Joint Answering Parties contend that because the relevant and measurable transmission-related benefits are captured, the avoided cost-only method meets the cost causation principle underlying the Commission’s first interregional cost allocation principle. Florida Answering Parties and SERTP Joint Answering Parties contend further that an allocation method fails this test only if the omission of some other “benefits” or beneficiaries causes the resulting cost

³²³ *Id.* at 30.

³²⁴ *Id.* at 31.

³²⁵ Florida Answering Parties Answer at 27; SERTP Joint Answer at 29-30.

allocation not to be “roughly commensurate” with the distribution of benefits.³²⁶ Florida Answering Parties and SERTP Joint Answering Parties argue that they have not seen an example of missed benefits and a means of allocating such benefits which appropriately reflects the market structure, the physical transmission rights model, and the fact that transmission planners do not engage in resource planning. Florida Answering Parties and SERTP Joint Answering Parties explain that savings due to reduced transmission losses could be an example of such a benefit, however the missed benefit examples reflect savings that are greater than those that typically could be achieved by reducing losses. Florida Answering Parties and SERTP Joint Answering Parties point out that the types of benefits listed in the examples in the regional orders are generally “economic” benefits, which are the types of benefits Order No. 1000 does not require to be considered for purposes of its interregional transmission coordination requirements.³²⁷

173. SERTP Joint Answering Parties disagree with Four Public Interest Organizations’ protests that the avoided cost-only method fails to consider public policy and economic transmission needs. SERTP Joint Answering Parties argue that Order No. 1000 holds that economic and public policy transmission needs need not be addressed at the interregional level because these needs will have already been addressed at the local and regional levels. However, SERTP Joint Answering Parties state that the reason they do not categorize either transmission projects or needs into “the three buckets” (i.e., as economic, public policy, or reliability) is because such buckets do not reflect meaningful categories related to the transmission planning performed for the “physical” transmission markets employed in the Southeast.³²⁸ SERTP Joint Answering Parties explain that in these non-RTO markets, resource-related transmission needs are identified and addressed in the underlying integrated resource planning processes, with the long-term transmission commitments made to effectuate those integrated resource planning determinations then driving the transmission planning performed by the transmission planners in the Southeast. SERTP Joint Answering Parties further explain that, as a result, the economic and transmission needs driven by public policy requirements, as well as transmission needs triggered by the requirement to have sufficient generation and demand-side resources to serve load reliably, are first identified in those state-regulated processes, while the transmission planning processes then ensure that the transmission system is

³²⁶ Florida Answering Parties Answer at 28; SERTP Joint Answer at 30.

³²⁷ Florida Answering Parties Answer at 28-29; SERTP Joint Answer at 30 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401).

³²⁸ SERTP Joint Answer at 33-34.

expanded to reliably deliver the power associated with addressing those needs.³²⁹ SERTP Joint Answering Parties argue that this aspect of the non-RTO, physical transmission markets employed in the SERTP region reinforces the use of an avoided cost-only method.

174. In response to Four Public Interest Organizations' argument that an avoided cost-only approach is not the only allocation method consistent with state-jurisdictional planning, SERTP Joint Answering Parties acknowledge that not all other cost allocation methods are inconsistent with state-supervised integrated resource planning.³³⁰ However, they argue that an avoided cost-only allocation method is the most consistent with that approach. SERTP Joint Answering Parties state that the proposed avoided cost-only allocation method recognizes, in the context of integrated resource planning, that: (1) load-serving entities and other customers benefit in the same manner however their needs are met; (2) transmission providers cannot dictate that load-serving entities change their needs or otherwise override state-regulated resource planning processes; and (3) other benefits beyond meeting needs identified in resource plans are too remote and speculative to quantify.³³¹

175. Florida Answering Parties and SERTP Joint Answering Parties argue that the interregional cost allocation process does not seek to reevaluate the regional allocation of costs based on those benefits; rather, it provides a method to distribute the benefit of the more economical or efficient solution to the affected regions. Florida Answering Parties and SERTP Joint Answering Parties explain that the regions in turn will rely upon their own regional allocation processes to allocate the costs within each region.³³²

176. Florida Answering Parties and SERTP Joint Answering Parties assert that if an interregional transmission facility does not meet the core set of needs that displace the project, then there cannot be a need for that interregional transmission facility and it would not survive any evaluation process. Florida Answering Parties argue that FMPA/Seminole assumes that an interregional transmission project that does not meet any identified need will be built.³³³

³²⁹ *Id.* at 32-33.

³³⁰ *Id.* at 39.

³³¹ *Id.* at 39-40.

³³² Florida Answering Parties Answer at 29-30; SERTP Joint Answer at 31-32.

³³³ Florida Answering Parties Answer at 30.

177. Florida Answering Parties and SERTP Joint Answering Parties state that the avoided cost-only method does not second-guess the potential need determinations made in the integrated resource processes but instead looks to see if there are more efficient and cost-effective transmission solutions to address those long-term commitments. Florida Answering Parties and SERTP Joint Answering Parties argue that whatever additional measure of benefits the Commission may require as to regional cost allocation is clearly not applicable to interregional cost allocation.³³⁴ Florida Answering Parties and SERTP Joint Answering Parties point out that the purpose of the interregional transmission coordination process is to consider whether the local and regional transmission planning processes result in transmission plans that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions.³³⁵ Florida Answering Parties and SERTP Joint Answering Parties clarify that interregional transmission planning processes therefore inform, and are inherently complementary to, regional processes because decision-making authority resides at the regional level.³³⁶

178. Florida Answering Parties and SERTP Joint Answering Parties point out that measuring the benefits of interregional transmission projects for cost allocation purposes through the avoided cost-only method is appropriate given that each region may decline to select an interregional transmission project in its regional transmission plan for cost allocation purposes if the project is not cost-effective for that region.³³⁷ Florida Answering Parties and SERTP Joint Answering Parties also point out that allocating an interregional transmission project's cost in proportion to the costs of the regional project or projects that it would displace takes into account the essentially voluntary nature of

³³⁴ Florida Answering Parties Answer at 32 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401); SERTP Joint Answer at 35 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401).

³³⁵ Florida Answering Parties Answer at 32 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 511); SERTP Joint Answer at 35 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 511).

³³⁶ Florida Answering Parties Answer at 32-33 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 401); SERTP Joint Answer at 35-36 (citing Order No. 1000 at P 401).

³³⁷ Florida Answering Parties Answer at 33 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 512); SERTP Joint Answer at 36 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 512).

interregional transmission coordination and results in a close “alignment of transmission planning and cost allocation.”³³⁸

179. In response to arguments alleging that the avoided cost-only method will result in projects not being built because they would not qualify in either regional plan, Florida Answering Parties and SERTP Joint Answering Parties note that interregional transmission projects do not need to qualify for Order No. 1000 interregional cost allocation to be built and clarify that any transmission customer can request that a project be built for any reason, subject to the cost allocation rules of the relevant OATTs and/or the FPA sections 210-212.³³⁹ Florida Answering Parties and SERTP Joint Answering Parties clarify that limits on criteria for transmission projects to potentially be included in the regional transmission plans for purposes of cost allocation in the FRCC and SERTP or the SCRTP and SERTP regions relate to projects seeking cost allocation. Florida Answering Parties and SERTP Joint Answering Parties also assert that needs are not determined at the interregional level.³⁴⁰

180. Florida Answering Parties respond to FMPA/Seminole’s request for clarification with respect to whether the segment of an interregional transmission project within each region must comply with the applicable threshold for that region and that the segment in FRCC does not have to meet SERTP thresholds (or vice-versa). Florida Answering Parties explain that while taking into account that only an interregional cost allocated project must meet the mentioned criteria (or merit an exception), the entire project does not have to meet the criteria of the first region, as to the portion of the project in the second region. Florida Answering Parties clarify that as long as the project meets the other individual SERTP or FRCC threshold criteria, the project could qualify as an interregional cost allocated project, without requesting that SERTP apply the flexibility exception to its kV threshold criteria.³⁴¹

181. In its answer, FPMA/Seminole contends that the point of Order No. 1000’s regional and interregional requirements is to address impacts on affected systems in a systematic manner that will eliminate obstacles to transmission development, including

³³⁸ Florida Answering Parties Answer at 33 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 582); SERTP Joint Answer at 36 (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 582).

³³⁹ 16 U.S.C. §§ 824i, k (2012).

³⁴⁰ Florida Answering Parties Answer at 34; SERTP Joint Answer at 36.

³⁴¹ Florida Answering Parties Answer at 36.

through cost allocation, in response to Florida Filing Parties-SERTP Filing Parties' argument that it is "next to impossible" to consider all impacts on "affected systems," and because any such effort would lead to "endless litigation," and asserts that this argument should be rejected.³⁴² FMPA/Seminole reiterates that FMPA's experience with seeking transmission for a power resource located north of the Georgia border demonstrates how the individual transmission service requests process effectively requires one customer to pay for the necessary upgrade costs for all future customers wanting transmission service.³⁴³ FPMA/Seminole asserts that Florida Filing Parties-SERTP Filing Parties have refused to come to grips with the interregional transmission coordination and cost allocation requirements of Order No. 1000.³⁴⁴

d. Commission Determination

182. We find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed interregional transmission cost allocation methods partially comply with the interregional transmission cost allocation requirements of Order No. 1000, subject to further compliance filings, as explained further below. Accordingly, we direct South Carolina, SERTP Filing Parties, Tampa Electric, FP&L, and Duke Florida to submit, within 60 days of the date of issuance of this order, further compliance filings, as explained further below. Likewise, Orlando Commission should also submit a further compliance filing.

183. We find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties comply with Order No. 1000's requirement that neighboring transmission planning regions propose a common interregional cost allocation method. Both Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties have proposed a common avoided cost-only cost allocation method, which each pair of neighboring regions has proposed in their tariffs with identical OATT language. Additionally, as permitted by Order No. 1000, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to apply their proposed avoided cost-only cost allocation method to all selected interregional transmission facilities, rather than having separate interregional cost allocation methods for different types of interregional transmission facilities, including interregional transmission facilities for

³⁴² FMPA/Seminole Answer at 5.

³⁴³ *Id.* at 7 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 10, 534, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 578, 726 (describing free-rider problem the Commission is seeking to address by its reforms)).

³⁴⁴ *Id.* at 8.

transmission needs driven by reliability, economic, or public policy requirements. These proposals are also consistent with our determination that public utility transmission providers, through their regional transmission planning process, must have an interregional cost allocation method or methods that apply to interregional transmission projects that address regional reliability and economic needs as well as transmission needs driven by public policy requirements.³⁴⁵

184. We also find that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties comply with Order No. 1000's requirement that an interregional transmission facility must be selected in each relevant regional transmission plan to be eligible for the proposed interregional cost allocation method. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties all propose that for a transmission project to be considered for interregional cost allocation, the transmission project must be proposed for purposes of cost allocation in both regions (i.e., FRCC and SERTP or SCRTP and SERTP) and that for costs of the transmission project to be allocated pursuant to the interregional cost allocation method, the project must be selected for purposes of cost allocation in the regional transmission plans of both regions (i.e., FRCC and SERTP or SCRTP and SERTP).³⁴⁶

185. We find that requiring that all criteria and associated requirements that Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose be met for an interregional transmission facility to be *considered* for interregional cost allocation, partially complies with Order No. 1000. Specifically, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that the interregional transmission facility must be: (1) interregional in nature; and (2) proposed for purposes of cost allocation in both the SERTP and SCRTP transmission planning regions or SERTP and FRCC transmission planning regions. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose a case-by-case exception by which each pair of neighboring regions will consider a transmission project that does not satisfy all of the proposed requirements for a transmission facility to be interregional in nature. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties' proposal specifies certain requirements that must be fulfilled in order for an interregional transmission facility to meet each of two criteria and thus be considered for interregional cost allocation.

³⁴⁵ *PJM Interconnection, L.L.C.*, 149 FERC ¶ 61,250, at P 190 (2014).

³⁴⁶ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), §§ 4.1, 4.5; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), §§ 4.1, 4.5; Southern Companies, OATT, Ex. K-4 (0.0.0), §§ 4.1, 4.5 and Ex.K-7 §§ 4.1, 4.5.

186. With respect to the first proposed criterion that an interregional transmission facility must be interregional in nature, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that the transmission facility: (1) be located in the FRCC and SERTP or SCRTP and SERTP regions; (2) interconnect to the transmission facilities of one or more SERTP Filing Parties and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional planning process; and (3) meet the criteria for transmission projects potentially eligible to be included in the regional transmission plans for purposes of cost allocation in both the SERTP and FRCC regions or SERTP and SCRTP regions pursuant to their regional transmission planning processes.³⁴⁷ We find that these requirements partially comply with Order No. 1000. We reiterate our earlier finding in the General Requirements section of this order that the proposed criterion for defining a transmission facility as interregional in nature requiring that the transmission facility must interconnect to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process is overly limiting and inconsistent with Order No. 1000 for the same reasons discussed above. Therefore, consistent with our finding in the General Requirements section of this order, we direct Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties to submit further compliance filings revising this criterion to remove the requirements that for an interregional transmission facility to be interregional in nature, the transmission facility must interconnect to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process.

187. With respect to the additional requirement under this criterion that an interregional transmission facility must meet the threshold criteria for transmission facilities potentially eligible to be included in the regional transmission plans for purposes of cost allocation in both the SERTP and FRCC transmission planning regions or the SERTP and SCRTP transmission planning regions, we find that to the extent that either FRCC/SERTP's or SCRTP/SERTP's Order No. 1000-compliant regional transmission planning processes contain threshold criteria that a transmission facility must meet in order to be proposed in the regional transmission planning process and be included in the regional transmission plans for purposes of cost allocation, such a determination is appropriate as a criterion for a transmission facility to be eligible for interregional cost allocation. However, consistent with the requirement that public utility transmission providers make transparent the analyses undertaken and determinations reached by neighboring

³⁴⁷ *E.g.*, SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1 A; FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1 A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.A and Ex. K-7, § 4.1.A.

transmission regions in the identification and evaluation of interregional transmission facilities,³⁴⁸ South Carolina-SERTP Filing Parties and Florida Filing Parties-SERTP Filing Parties must allow stakeholders to propose, and must keep a record of, interregional transmission facilities that are found not to meet the minimum threshold criteria for transmission facilities potentially eligible for selection in a regional transmission plan for purposes of cost allocation in both the SERTP and SCRTP regions and SERTP and FRCC regions. In addition, as part of the information that public utility transmission providers must communicate on their website related to interregional transmission coordination procedures,³⁴⁹ South Carolina-SERTP Filing Parties and Florida Filing Parties-SERTP Filing Parties must post a list of all interregional transmission facilities that are proposed for potential selection in the regional transmission plans for purposes of cost allocation but that are found not to meet the relevant thresholds, as well as an explanation of the thresholds the proposed interregional transmission facilities failed to satisfy.

188. With respect to the proposal that, on a case-by-case basis, FRCC and SERTP or SCRTP and SERTP will consider a transmission project that does not meet all the requirements for a transmission facility to be interregional in nature but that: (1) meets the threshold criteria for a transmission project proposed to be included in the regional transmission plan for purposes of cost allocation in only one of the two relevant neighboring transmission planning regions; (2) would be located in both neighboring transmission planning regions; and (3) would be interconnected to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process,³⁵⁰ we find that these requirements partially comply with the requirements of Order No. 1000. We do not object to Florida Filing Parties-SERTP Filing Parties' and South Carolina-

³⁴⁸ Order No. 1000-A, 139 FERC ¶ 61,132 at P 520 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 465 n.365).

³⁴⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 458.

³⁵⁰ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.B and Ex. K-7, § 4.1.B. Florida Filing Parties-SERTP Filing Parties also propose a fourth criterion to be eligible for this case-by-case consideration, i.e., a transmission project must also provide significant interregional benefits (i.e., a major transmission project effectuating significant bulk transfers between the respective FRCC and SERTP regions). FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.B.

SERTP Filing Parties' flexibility in allowing interregional cost allocation for interregional transmission projects that do not satisfy all of the criteria specified in each region's individual regional process. However, regarding Florida Filing Parties-SERTP Filing Parties' proposed fourth criterion that a transmission project must also provide significant interregional benefits to qualify for a case-by-case exception, it is unclear how and to what extent an interregional transmission project will be deemed to provide "significant" benefits. Further, as explained above, we do not accept the requirement that the transmission facility must be interconnected to the transmission facilities of one or more transmission owners in both relevant neighboring transmission planning regions. Accordingly, we direct Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties to submit further compliance filings revising this case-by-case criterion to (1) provide additional explanation on how and to what extent a transmission project will be deemed and qualified to provide significant benefits such that it can be selected as an interregional transmission facility for purposes of cost allocation and (2) remove the requirement that the transmission facility must be interconnected to the transmission facilities of one or more SERTP Sponsors and the transmission facilities of one or more FRCC or SCRTP members enrolled in the regional transmission planning process.

189. Finally, with respect to the third proposed criterion that the transmission facility must be proposed for purposes of cost allocation in both the FRCC and SERTP regions or SCRTP and SERTP regions, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that: (1) the transmission developer and project submittal must satisfy all criteria specified in the regional transmission processes and (2) the proposal should be submitted in the timeframes outlined in the regional transmission processes.³⁵¹ We find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals comply with Order No. 1000 because the requirements under this criterion memorialize that in proposing an interregional transmission facility for purposes of cost allocation, such a project must meet all of the criteria and requirements of each region in which it is proposed and the project and its developer must satisfy the qualification criteria and submittal requirements of the pertinent regions. We find that these requirements are consistent with the requirement in Order No. 1000 that a transmission developer of an interregional transmission project first propose its transmission project in the regional transmission planning processes of

³⁵¹ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.C; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.1.C.

each of the neighboring regions in which the transmission facility is proposed to be located.³⁵²

190. We also find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' interregional cost allocation proposals comply with Order No. 1000's six Interregional Cost Allocation Principles. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to quantify the regional benefits of a proposed interregional transmission facility based upon the cost of regional transmission projects in each of their regional transmission plans that could be displaced by the proposed interregional transmission facility. Such a proposal is an "avoided-cost only method," meaning a cost allocation method that relies exclusively on avoided-costs to account for benefits associated with transmission needs driven by reliability, economic, and public policy requirements. The Commission previously concluded that an avoided-cost only method was not permissible as the sole cost allocation method for *regional* transmission projects proposed for selection in the regional transmission plan for purposes of cost allocation. As explained below, we conclude that an avoided-cost only method is permissible as the sole cost allocation methodology for *interregional* transmission projects proposed for interregional cost allocation.

191. As an initial matter, we find that the interplay between the regional transmission planning and interregional coordination requirements of Order No. 1000 address, at the interregional level, the Commission's concerns regarding use of the avoided-cost only method at the regional level. The Commission previously found that an avoided cost-only method for allocating the costs of new regional transmission facilities selected in the regional transmission plan for purposes of cost allocation at the regional level did not comply with Regional Cost Allocation Principle 1.³⁵³

192. Specifically, the Commission stated that using one regional cost allocation method that relies solely on avoided costs to capture the potential benefits associated with transmission needs driven by regional reliability, economic, and/or public policy requirements does not allocate costs in a manner that is at least roughly commensurate

³⁵² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

³⁵³ See SERTP First Compliance Order, 144 FERC ¶ 61,054 at P 248. However, the Commission found that such an approach may be used to identify the beneficiaries of reliability transmission projects when separate cost allocation methods are used for transmission projects to address transmission needs driven by regional reliability, economic, and public policy requirements. See, e.g., WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 312.

with estimated benefits because it does not adequately assess the potential benefits provided by that transmission facility. Rather, an avoided cost-only cost allocation method when used at the regional level would consider as benefits only the cost savings that result when a local transmission project is avoided due to the selection of a regional transmission facility in the regional transmission plan for purposes of cost allocation, failing to account for benefits that were not identified in the local transmission planning processes, but that could be recognized at the regional level through a regional analysis of more efficient or cost-effective solutions to regional transmission needs.³⁵⁴ Additionally, in rejecting an avoided cost-only cost allocation method at the regional level, the Commission stated that a regional transmission facility that resulted in a more efficient or cost-effective transmission solution than what was included in the roll-up of local transmission plans would not be eligible for regional cost allocation if there was no transmission facility in the local transmission plans that it would displace.³⁵⁵ A key consideration in the Commission's finding, therefore, was the interplay between the scope of local and regional transmission planning.

193. However, we conclude that the regional transmission planning and interregional transmission coordination reforms required by Order No. 1000 address these concerns regarding the use of an avoided-cost only method at the interregional level. Through the reforms implemented by Order No. 1000, we expect that the regional transmission planning process will result in the identification of regional transmission facilities that potential interregional transmission facilities may displace. In Order No. 1000, the Commission required reforms to existing transmission planning processes to ensure that public utility transmission providers “adequately assess the potential benefits of alternative transmission solutions at the regional level that may meet the needs of a transmission planning region more efficiently or cost-effectively than solutions identified by individual public utility transmission providers in their local transmission planning process.”³⁵⁶ For instance, the Commission required public utility transmission providers to work within a transmission planning region to create a regional transmission plan that identifies transmission facilities needed to meet reliability, economic, and public policy requirements, and reflects fair consideration of transmission facilities proposed by incumbent and nonincumbent transmission developers, as well as interregional transmission facilities.³⁵⁷ Thus, in contrast to the concerns that the Commission had with

³⁵⁴ SERTP First Regional Compliance Order, 144 FERC ¶ 61,054 at PP 249- 250.

³⁵⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 81.

³⁵⁷ *See e.g., id.* P 11.

an avoided cost-only cost allocation method when used at the regional level,³⁵⁸ we expect there will be regional transmission facilities identified in the regional transmission planning process that are needed to meet transmission needs driven by reliability, economic, and/or public policy requirements that potential interregional transmission facilities may displace.

194. As noted above, the relationship between the regional transmission planning and interregional transmission coordination requirements of Order No. 1000 is central to our finding here. Order No. 1000's interregional coordination requirements build upon and complement the reforms required in the regional transmission planning processes; as a result, use of an avoided cost-only cost allocation method at the interregional level would consider as benefits the cost savings that result when a regional transmission project selected in a regional transmission plan for purposes of cost allocation is avoided due to the selection of a more efficient or cost-effective interregional transmission facility. Whereas Order No. 1000 requires public utility transmission providers to evaluate through the regional transmission planning process alternative transmission solutions that might meet the needs of the transmission planning region more efficiently or cost-effectively than transmission solutions identified by individual public utility transmission providers in their local transmission planning process,³⁵⁹ Order No. 1000 does not require public utility transmission providers to conduct interregional transmission planning, nor does it require public utility transmission providers to produce an interregional transmission plan that considers transmission solutions to meet interregional transmission needs identified separately at the interregional level.³⁶⁰ Rather, Order No. 1000's interregional transmission coordination requirements obligate public utility transmission providers to identify and jointly evaluate interregional transmission facilities that may more efficiently or cost-effectively address the individual needs identified in their respective local and regional transmission planning processes.³⁶¹ Since the interregional coordination procedures do not require an interregional analysis of more efficient or cost-

³⁵⁸ As noted above, in the SERTP First Regional Compliance Order, the Commission stated that a regional transmission facility that resulted in a more efficient or cost-effective transmission solution than what was included in the roll-up of local transmission plans would not be eligible for regional cost allocation if there was no transmission facility in the local transmission plans that it would displace. SERTP First Regional Compliance Order, 144 FERC ¶ 61,054 at P 251.

³⁵⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 148.

³⁶⁰ *See id.* P 399.

³⁶¹ *Id.* P 393.

effective solutions to interregional transmission needs, but only a joint evaluation of interregional transmission facilities that may more efficiently or cost-effectively address regional transmission needs, the selected interregional transmission facility will address transmission needs driven by regional reliability, economic, and/or public policy requirements that have already been identified and evaluated for potential transmission solutions at the regional level. Thus, an avoided cost-only cost allocation method when used at the interregional level will account for benefits that were identified in the regional transmission planning processes and therefore complies with Interregional Cost Allocation Principle 1.

195. We also disagree with Four Public Interest Organizations' assertion that an avoided cost-only interregional cost allocation method fails to sufficiently consider all of the benefits that may accrue from an interregional transmission project. While Four Public Interest Organizations argue that an avoided cost-only method ignores the fact that a selected interregional transmission facility may address regional transmission needs but have different attributes, functions, and location than a displaced regional transmission project, and therefore a different benefit "profile," we agree with SERTP Joint Answering Parties' response. Specifically, we agree that the interregional transmission coordination process does not change the regional transmission needs that the interregional transmission facility addresses, but instead determines whether the interregional transmission facility addresses those regional transmission needs more efficiently or cost-effectively.

196. With respect to Four Public Interest Organizations' argument that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals to allow each region to determine its own *pro rata* share of the costs and benefits of an interregional transmission facility fails to meet Order No. 1000's requirement for a common interregional cost allocation method, we agree with SERTP Filing Parties that allowing each region to use its own method to determine benefits does not undercut the fact that an avoided cost-only method may constitute a common interregional cost allocation method. We agree that because Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals require that in order for an interregional transmission facility to be eligible for interregional cost allocation, the project must have benefits for each region, it is appropriate that each region's specific provisions addressing the determination of benefits should apply.

197. Furthermore, we find that the proposed avoided cost-only method complies with Interregional Cost Allocation Principles 2 and 4 because the costs of an interregional transmission facility will be allocated either between the FRCC and SERTP or SCRTP and SERTP transmission planning regions if that transmission facility is selected for purposes of cost allocation in the regional transmission plans of both FRCC and SERTP or SCRTP and SERTP. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties also propose that only a transmission project that is located in both

FRCC and SERTP or SCRTP and SERTP will be considered for interregional cost allocation.³⁶² Thus, a transmission planning region that receives no benefit from an interregional transmission facility located in that region will not be involuntarily allocated costs of that transmission facility. Further, costs of an interregional transmission facility will only be allocated to the transmission planning regions in which that transmission facility is located. We note that both Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose that neither FRCC and SERTP nor SCRTP and SERTP will be responsible for compensating another transmission planning region for necessary upgrades or other consequences of interregional transmission projects identified in the interregional coordination process.³⁶³ While we find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposals comply with Regional Cost Allocation Principle 4, we encourage FRCC and SERTP or SCRTP and SERTP to work with neighboring transmission planning regions pursuant to any existing arrangements, and to consider new opportunities that might arise, to address impacts on other regions. Order No. 1000 was not intended to disrupt or impede any such arrangements.

198. In addition, we find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed avoided cost-only allocation method complies with Interregional Cost Allocation Principle 3 because they do not propose to apply an interregional benefit-to-cost ratio. In Order No. 1000, the Commission stated that Interregional Cost Allocation Principle 3 did not require the use of a benefit-to-cost ratio threshold.³⁶⁴

199. However, we note that while South Carolina-SERTP Filing Parties propose that each region will calculate a regional benefit-to-cost ratio and compare the ratio to its respective threshold to determine if the interregional transmission facility appears to be more efficient *or* cost-effective than those projects included in its current regional and local transmission plans,³⁶⁵ Florida Filing Parties-SERTP Filing Parties propose to

³⁶² *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.1.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.1.A ; Southern Companies, OATT, Ex.K-4 (0.0.0), § 4.1.A and Ex. K-7, § 4.1.A.

³⁶³ *E.g.*, Southern Companies Compliance Filing, Docket No. ER13-1941-000 at 14.

³⁶⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 647, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 693.

³⁶⁵ SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.3; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.3.

compare the benefit-to-cost ratio to its respective threshold to determine if the interregional transmission facility appears to be more efficient *and* cost-effective than those projects included in its current regional transmission plan.³⁶⁶ We find that Florida Filing Parties-SERTP Filing Parties' proposal to use the "more efficient *and* cost-effective" standard is not consistent with Order No. 1000, which requires neighboring transmission planning regions to enhance their regional transmission planning processes to provide for "the identification and joint evaluation of interregional transmission facilities that may be more efficient *or* cost-effective solutions" to regional needs.³⁶⁷ We therefore direct Tampa Electric, FP&L, Duke Florida, and SERTP Filing Parties to make this correction in their OATTs in a further compliance filing. Likewise, Orlando Commission should also submit a further compliance filing to address this issue.

200. Moreover, we find that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed avoided cost-only cost allocation method complies with Interregional Cost Allocation Principle 5. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties argue that because benefits that form the basis of cost allocation are quantifiable, the cost allocation method and data requirements for determining benefits and identifying beneficiaries would be transparent. We agree. Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties propose to make the analyses and results that determine Regional Benefits³⁶⁸ for purposes of allocating costs available to stakeholders.³⁶⁹ Similarly, we also find that these proposed tariff revisions regarding transparency will also ensure that stakeholders

³⁶⁶ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.3.A; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.3.A.

³⁶⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396 (emphasis added). *See also, e.g.*, SERTP Regional Rehearing and Compliance Order, 144 FERC ¶ 61,054 at P 198; WestConnect First Regional Compliance Order, 142 FERC ¶ 61,206 at P 283; *New York Independent System Operator, Inc.*, 148 FERC ¶ 61,044, at P 257 (2014).

³⁶⁸ *E.g.*, FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.2.B; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.2.B and Ex. K-7, § 4.2.B. As defined in section 4.2.B, Regional Benefit is the total avoided costs of transmission projects included in the then-current regional transmission plan that would be displaced if a proposed interregional transmission project is included.

³⁶⁹ FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4 and Ex. K-7, § 4.

will have access to adequate documentation that describes how the interregional cost allocation method was applied to a proposed interregional transmission facility.

201. We find that the proposed interregional cost allocation method complies with Interregional Cost Allocation Principle 6. Order No. 1000 states that under Interregional Cost Allocation Principle 6, public utility transmission providers located in neighboring transmission planning regions *may* choose to use a different cost allocation method for different types of interregional transmission facilities.³⁷⁰ Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties have chosen not to propose different cost allocation methods for different types of transmission facilities. However, as noted above in the discussion of Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' compliance with Interregional Cost Allocation Principle 1, the Commission previously found that their regional transmission planning processes and regional cost allocation methods address regional reliability, market efficiency, and public policy related needs, as well as consider the benefits that may accrue from addressing regional reliability, market efficiency, and public policy related needs.³⁷¹ Also as previously noted, Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed interregional cost allocation methods affirmatively require that a proposed interregional transmission facility must be selected in Florida Filing Parties-SERTP Filing Parties or South Carolina-SERTP Filing Parties' regional transmission planning processes.³⁷² Taken together, these findings confirm that Florida Filing Parties-SERTP Filing Parties' and South Carolina-SERTP Filing Parties' proposed avoided cost-only cost allocation method applies to interregional transmission facilities that address regional transmission needs driven by reliability, economic and/or public policy requirements.

202. Finally, we find reasonable South Carolina-SERTP Filing Parties' proposed OATT revisions to: (1) evaluate proposals to determine whether, in addition to transmission projects in the *regional* transmission plans, the proposed interregional transmission facility addresses transmission needs that are currently being addressed with transmission projects in *local* transmission plans and, if so, which transmission projects in the *local* transmission plans could be displaced by the proposed interregional

³⁷⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 685 (emphasis added).

³⁷¹ See SERTP Regional Rehearing and Compliance Order, 147 FERC ¶ 61,241.

³⁷² FP&L, FPL OATT, Attachment K-1 (0.0.0), § 4.5; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.5; Southern Companies, OATT, Ex. K-4 (0.0.0), § 4.5 and Ex. K-7, § 4.5.

transmission facility³⁷³ and (2) calculate a Regional Benefit based on the total avoided capital costs of projects included in the then-current local transmission plans, in addition to the then-current regional transmission plans, that would be displaced if the proposed interregional transmission facility was included.³⁷⁴

3. Other

a. Compliance Filings

203. South Carolina-SERTP Filing Parties propose to terminate or dissolve the Southeast Inter-Regional Participation Process (SIRPP).³⁷⁵ South Carolina-SERTP Filing Parties explain that the original goals of the SIRPP, to allow stakeholder-requested studies for the SIRPP footprint and to provide updates of SERC Reliability Corporation's activities, will now be included by SERTP Filing Parties' regional process, providing a venue for stakeholders to submit economic study requests for the SIRPP geographic footprint.³⁷⁶ In addition, Florida Filing Parties-SERTP Filing Parties and South Carolina-SERTP Filing Parties state that Florida Filing Parties-SERTP Filing Parties removed references to SIRPP-FRCC coordination provisions and references to SIRPP from their OATTs.³⁷⁷ South Carolina-SERTP Filing Parties also indicate that they previously adopted language stating that their interregional transmission coordination procedures need "to provide a means for, among other things, stakeholders to request inter-regional

³⁷³ Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.2.A; SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.A.

³⁷⁴ SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0), § 4.2.B; Southern Companies, OATT, Ex. K-7 (0.0.0), § 4.2.B.

³⁷⁵ The SIRPP consists of Duke Energy Carolinas, LLC, Entergy Operating Companies, E.ON U.S., LLC, Progress Energy Carolinas, Inc., Santee Cooper, Southern Companies, and the Tennessee Valley Authority.

³⁷⁶ FP&L Compliance Filing, Docket No. ER13-1929-000, at 18-19; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 13-14.

³⁷⁷ FP&L Compliance Filing, Docket No. ER13-1929-000, at 19; South Carolina Compliance Filing, Docket No. ER13-1935-000, at 49.

economic studies,” which will be removed from their OATTs following final dissolution of the SIRPP.³⁷⁸

b. Commission Determination

204. We find South Carolina-SERTP Filing Parties’ proposal to dissolve the SIRPP and remove the corresponding references to the SIRPP, is acceptable. As South Carolina-SERTP Filing Parties note, the SERTP regional transmission planning process provides a robust planning process for the expanded SERTP region that includes the opportunity to submit economic study requests. Thus, we accept South Carolina-SERTP Filing Parties’ proposal to terminate and delete tariff references to the SIRPP.

The Commission orders:

(A) Florida Filing Parties-SERTP Filing Parties’ compliance filings are hereby accepted, as modified, effective January 1, 2016, subject to further compliance filings, as discussed in the body of this order.

(B) South Carolina-SERTP Filing Parties’ compliance filings are hereby accepted effective January 1, 2015, subject to further compliance filings, as discussed in the body of this order.

(C) South Carolina is hereby directed to submit further compliance filings, within 60 days of the date of issuance of this order, as discussed in the body of this order.

(D) Florida Filing Parties are hereby directed to submit further compliance filings, within 60 days of the date of issuance of this order, as discussed in the body of this order.

³⁷⁸ South Carolina Compliance Filing, Docket No. ER13-1935-000, at 13-14.

(E) SERTP Filing Parties are hereby directed to submit further compliance filings, within 60 days of the date of issuance of this order, as discussed in the body of this order.

By the Commission. Commissioner Honorable is voting present.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Appendix A: Abbreviated Names of Intervenors

The following tables contain the abbreviated names of intervenors that are used in this Order on Compliance Filings.

Intervenors

**Tampa Electric, Duke Florida and FP&L Compliance Filings
Docket Nos. ER13-1922-000, ER13-1929-000 and ER13-1932-000**

Abbreviation	Intervenors
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Florida Public Service Commission	Florida Public Service Commission
FMPA/Seminole	Florida Municipal Power Agency and Seminole Electric Cooperative, Inc.
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project
Georgia Transmission Corporation	Georgia Transmission Corporation
LG&E/KU	Louisville Gas and Electric Co. and Kentucky Utilities Co.
MEAG Power	MEAG Power
North Carolina Utilities Commission	North Carolina Utilities Commission and the Public Staff of the North Carolina Utilities Commission
OVEC	Ohio Valley Electric Corporation
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative
Reedy Creek Improvement District	Reedy Creek Improvement District
Rockland Electric Company	Rockland Electric Company

South Carolina Office of Regulatory Staff	South Carolina Office of Regulatory Staff
Southern Companies	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
South Mississippi Electric Power Association	South Mississippi Electric Power Association
Tennessee Valley Authority	Tennessee Valley Authority

Duke Carolinas Compliance Filing
Docket No. ER13-1928-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Dominion Resources Services	Dominion Resources Services, Inc.
Exelon	Exelon Corporation
FirstEnergy Transmission Owners	Jersey Central Power & Light Company, Metropolitan Edison Company, Pennsylvania Electric Company, Monongahela Power Company, The Potomac Edison Company, West Penn Power Company, American Transmission Systems, Incorporated, Trans-Allegheny

	Interstate Line Company
Florida Commission	Florida Public Service Commission
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project
Georgia Transmission Corporation	Georgia Transmission Corporation
LG&E/KU	Louisville Gas & Electric Company and Kentucky Utilities Company
MEAG Power	MEAG Power
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy
MISO	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners	Ameren Services Company (as agent for Union Electric Company, Ameren Illinois Company, Ameren Transmission Company of Illinois); City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Great River Energy; Hoosier Energy Rural Electric; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Montana-Dakota Utilities Co.; Northern States Power Company (Minnesota and Wisconsin corporations); Otter Tail Power Company; Southern Indiana Gas & Electric Company; Southern Minnesota Municipal Power Agency; and Wabash Valley Power Association, Inc.

NCEMC	North Carolina Electric Membership Corporation
North Carolina Utilities Commission	North Carolina Utilities Commission, Public Staff-North Carolina Utilities Commission
Old Dominion Electric Cooperative	Old Dominion Electric Cooperative
OVEC	Ohio Valley Electric Corporation
PJM	PJM Interconnection, L.L.C.
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative
PPL Electric Utilities *	PPL Electric Utilities Corporation; PPL EnergyPlus, LLC; PPL Brunner Island, LLC; PPL Holtwood, LLC; PPL Ironwood, LLC; PPL Martins Creek, LLC; PPL Montour, LLC; PPL Susquehanna, LLC; Lower Mount Bethel Energy, LLC; PPL New Jersey Solar, LLC; PPL New Jersey Biogas, LLC; and PPL Renewable Energy, LLC
PSEG Companies	Public Service Electric and Gas Company, PSEG Power LLC, and PSEG Energy Resources & Trade LLC
Rockland Electric Company	Rockland Electric Company
South Carolina Office of Regulatory Staff	South Carolina Office of Regulatory Staff
Southern Companies	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
South Mississippi Electric Power Association	South Mississippi Electric Power Association

SPP	Southwest Power Pool, Inc.
Tennessee Valley Authority	Tennessee Valley Authority

* late intervention

LG&E/KU Compliance Filing
Docket No. ER13-1930-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Dominion Resources Services	Dominion Resources Services, Inc.
Duke Carolinas and Duke Florida	Duke Energy Carolinas, LLC; Duke Energy Florida, Inc.; Duke Energy Progress, Inc.
Exelon	Exelon Corporation
FirstEnergy Transmission Owners	Jersey Central Power & Light Company, Metropolitan Edison Company, Pennsylvania Electric Company, Monongahela Power Company, The Potomac Edison Company, West Penn Power Company, American Transmission Systems, Incorporated, Trans-Allegheny Interstate Line Company
Florida Commission	Florida Public Service Commission
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project

Georgia Transmission Corporation	Georgia Transmission Corporation
Indiana Commission	Indiana Utility Regulatory Commission
Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
MEAG Power	MEAG Power
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy
MISO	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners	Ameren Services Company (as agent for Union Electric Company, Ameren Illinois Company, Ameren Transmission Company of Illinois); City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Great River Energy; Hoosier Energy Rural Electric; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Montana-Dakota Utilities Co.; Northern States Power Company (Minnesota and Wisconsin corporations); Otter Tail Power Company; Southern Indiana Gas & Electric Company; Southern Minnesota Municipal Power Agency; and Wabash Valley Power Association, Inc.
North Carolina Commission	North Carolina Utilities Commission, Public Staff-North Carolina Utilities Commission
Old Dominion Electric Cooperative	Old Dominion Electric Cooperative

Organization of MISO States	Indiana Utility Regulatory Commission; Iowa Utilities Board; Michigan Public Service Commission; Minnesota Public Utilities Commission; Missouri Public Service Commission; Montana Public Service Commission; North Dakota Public Service Commission; South Dakota Public Utilities Commission; Wisconsin Public Service Commission
OVEC	Ohio Valley Electric Corporation
PJM	PJM Interconnection, L.L.C.
PowerSouth Electric Cooperative	PowerSouth Energy Cooperative
PPL Electric Utilities *	PPL Electric Utilities Corporation; PPL EnergyPlus, LLC; PPL Brunner Island, LLC; PPL Holtwood, LLC; PPL Ironwood, LLC; PPL Martins Creek, LLC; PPL Montour, LLC; PPL Susquehanna, LLC; Lower Mount Bethel Energy, LLC; PPL New Jersey Solar, LLC; PPL New Jersey Biogas, LLC; and PPL Renewable Energy, LLC
Rockland Electric Company	Rockland Electric Company
South Mississippi Electric Power Association	South Mississippi Electric Power Association
Southern Company Services	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
SPP	Southwest Power Pool, Inc.
Tennessee Valley Authority	Tennessee Valley Authority

Wisconsin Electric Power
Company

Wisconsin Electric Power
Company

* late intervention

OVEC Compliance Filing
Docket No. ER13-1940-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Dominion Resources Services	Dominion Resources Services, Inc.
Duke Carolinas and Duke Florida	Duke Energy Carolinas, LLC; Duke Energy Florida, Inc.; Duke Energy Progress, Inc.
FirstEnergy Transmission Owners	Jersey Central Power & Light Company, Metropolitan Edison Company, Pennsylvania Electric Company, Monongahela Power Company, The Potomac Edison Company, West Penn Power Company, American Transmission Systems, Incorporated, Trans-Allegheny Interstate Line Company
Florida Commission	Florida Public Service Commission
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project
Georgia Transmission Corporation	Georgia Transmission Corporation

Indiana Commission	Indiana Utility Regulatory Commission
Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
LG&E/KU	Louisville Gas & Electric Company and Kentucky Utilities Company
MEAG Power	MEAG Power
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy
MISO	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners	Ameren Services Company (as agent for Union Electric Company, Ameren Illinois Company, Ameren Transmission Company of Illinois); City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Great River Energy; Hoosier Energy Rural Electric; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Montana-Dakota Utilities Co.; Northern States Power Company (Minnesota and Wisconsin corporations); Otter Tail Power Company; Southern Indiana Gas & Electric Company; Southern Minnesota Municipal Power Agency; and Wabash Valley Power Association, Inc.
North Carolina Commission	North Carolina Utilities Commission, Public Staff-North Carolina Utilities Commission
Old Dominion Electric Cooperative	Old Dominion Electric Cooperative

Organization of MISO States	Indiana Utility Regulatory Commission; Iowa Utilities Board; Michigan Public Service Commission; Minnesota Public Utilities Commission; Missouri Public Service Commission; Montana Public Service Commission; North Dakota Public Service Commission; South Dakota Public Utilities Commission; Wisconsin Public Service Commission
PJM	PJM Interconnection, L.L.C.
PowerSouth Electric Cooperative	PowerSouth Energy Cooperative
PPL Electric Utilities*	PPL Electric Utilities Corporation; PPL EnergyPlus, LLC; PPL Brunner Island, LLC; PPL Holtwood, LLC; PPL Ironwood, LLC; PPL Martins Creek, LLC; PPL Montour, LLC; PPL Susquehanna, LLC; Lower Mount Bethel Energy, LLC; PPL New Jersey Solar, LLC; PPL New Jersey Biogas, LLC; and PPL Renewable Energy, LLC
Rockland Electric Company	Rockland Electric Company
Southern Company Services	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
South Mississippi Electric Power Association	South Mississippi Electric Power Association
SPP	Southwest Power Pool, Inc.
Tennessee Valley Authority	Tennessee Valley Authority

* late intervention

Southern Companies Compliance Filing
Docket No. ER13-1941-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
Alabama Commission	Alabama Public Service Commission
AMEA	Alabama Municipal Electric Authority
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Dominion Resources Services	Dominion Resources Services, Inc.
Duke Carolinas and Duke Florida	Duke Energy Carolinas, LLC; Duke Energy Florida, Inc.; Duke Energy Progress, Inc.
Exelon	Exelon Corporation
FirstEnergy Transmission Owners	Jersey Central Power & Light Company, Metropolitan Edison Company, Pennsylvania Electric Company, Monongahela Power Company; The Potomac Edison Company, West Penn Power Company, American Transmission Systems, Incorporated, Trans-Allegheny Interstate Line Company
Florida Commission	Florida Public Service Commission
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project
Georgia Transmission Corporation	Georgia Transmission Corporation
LG&E/KU	Louisville Gas & Electric Company and

	Kentucky Utilities Company
MEAG Power	MEAG Power
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy
MISO	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners	Ameren Services Company (as agent for Union Electric Company, Ameren Illinois Company, Ameren Transmission Company of Illinois); City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Great River Energy; Hoosier Energy Rural Electric; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Montana-Dakota Utilities Co.; Northern States Power Company (Minnesota and Wisconsin corporations); Otter Tail Power Company; Southern Indiana Gas & Electric Company; Southern Minnesota Municipal Power Agency; and Wabash Valley Power Association, Inc.
North Carolina Commission	North Carolina Utilities Commission, Public Staff-North Carolina Utilities Commission
Old Dominion Electric Cooperative	Old Dominion Electric Cooperative
OVEC	Ohio Valley Electric Corporation
PJM	PJM Interconnection, L.L.C.
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative

PPL Electric Utilities*	PPL Electric Utilities Corporation; PPL EnergyPlus, LLC; PPL Brunner Island, LLC; PPL Holtwood, LLC; PPL Ironwood, LLC; PPL Martins Creek, LLC; PPL Montour, LLC; PPL Susquehanna, LLC; Lower Mount Bethel Energy, LLC; PPL New Jersey Solar, LLC; PPL New Jersey Biogas, LLC; and PPL Renewable Energy, LLC
Rockland Electric Company	Rockland Electric Company
South Mississippi Electric Power Association	South Mississippi Electric Power Association
SPP	Southwest Power Pool, Inc.
Tennessee Valley Authority	Tennessee Valley Authority

* late intervention

South Carolina Compliance Filing
Docket No. ER13-1935-000

Abbreviation	Intervenor(s)
Associated Electric Cooperative	Associated Electric Cooperative, Inc.
Dalton Utilities	Dalton Utilities
Duke Carolinas and Duke Florida	Duke Energy Carolinas, LLC, Duke Energy Florida, Inc., and Duke Energy Progress, Inc.
Exelon	Exelon Corporation
Florida Commission	Florida Public Service Commission
Four Public Interest Organizations	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project

Georgia Transmission Corporation	Georgia Transmission Corporation
LG&E/KU	Louisville Gas & Electric Company and Kentucky Utilities Company
MEAG Power	MEAG Power
North Carolina Electric Membership Corporation	North Carolina Electric Membership Corporation
North Carolina Commission	North Carolina Utilities Commission and the Public Staff of the North Carolina Utilities Commission
OVEC	Ohio Valley Electric Corporation
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative
Rockland Electric Company	Rockland Electric Company
Southern Companies	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
South Mississippi Electric Power Association	South Mississippi Electric Power Association
Tennessee Valley Authority	Tennessee Valley Authority

Orlando Commission Compliance Filing
Docket No. NJ13-11-000

Abbreviation

Intervenor(s)

Associated Electric Cooperative

Associated Electric Cooperative, Inc.

Dalton Utilities	Dalton Utilities
Georgia Transmission Corporation	Georgia Transmission Corporation
LG&E/KU	Louisville Gas and Electric Co. and Kentucky Utilities Co.
MEAG Power	MEAG Power
OVEC	Ohio Valley Electric Corporation
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative
Reedy Creek Improvement District	Reedy Creek Improvement District
Rockland Electric Company	Rockland Electric Company
South Mississippi Electric Power Association	South Mississippi Electric Power Association
Southern Companies	Southern Company Services, Inc. (on behalf of Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Power Company)
Tennessee Valley Authority	Tennessee Valley Authority

Appendix B: Abbreviated Names of Initial Commenters

The following tables contain the abbreviated names of initial commenters that are used in this Order on Compliance Filings.

Initial Commenters

**Tampa Electric, Duke Florida and FP&L Compliance Filings
Docket Nos. ER13-1922-000, ER13-1929-000 and ER13-1932-000**

Abbreviation	Commenter(s)
Four Public Interest Organizations+	Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project

FMPA/Seminole+

Florida Municipal Power Agency and
Seminole Electric Cooperative, Inc.

+ protest

**Duke Carolinas, LG&E/KU, OVEC, and Southern Companies Compliance
Filings**

**Docket Nos. ER13-1928-000, ER13-1930-000, ER13-1940-000, and ER13-
1941-000**

Abbreviation

Commenter(s)

Four Public Interest Organizations+

Natural Resources Defense Council,
Sierra Club, Southern Environmental
Law Center, Sustainable FERC Project

+ protest

**South Carolina Compliance Filing
Docket No. ER13-1935-000**

Abbreviation

Commenter(s)

Four Public Interest Organizations+

Natural Resources Defense Council,
Sierra Club, Southern Environmental
Law Center, Sustainable FERC Project

+ protest

**Orlando Commission Compliance Filing
Docket No. NJ13-11-000**

Abbreviation

Commenter(s)

No comments were filed

Appendix C: Abbreviated Names of Reply Commenters

The following tables contain the abbreviated names of reply commenters that are used in this Order on Compliance Filings.

Reply Commenters

**Tampa Electric, Duke Florida and FP&L Compliance Filings
Docket Nos. ER13-1922-000, ER13-1929-000 and ER13-1932-000**

Abbreviation	Commenter(s)
Florida Answering Parties ³⁷⁹	Duke Energy Florida, LLC Tampa Electric Company Florida Power & Light Company
FMPA/Seminole ³⁸⁰	Florida Municipal Power Agency and Seminole Electric Cooperative, Inc.

**Duke Carolinas, LG&E/KU, OVEC, and Southern Companies Compliance
Filings**

Docket Nos. ER13-1928-000, ER13-1930-000, ER13-1940-000, and ER13-1941-000

Abbreviation	Commenter(s)
SERTP Joint Answering Parties ³⁸¹	South Carolina Electric & Gas

³⁷⁹ Florida Answering Parties filed an answer to protests.

³⁸⁰ FMPA/Seminole filed an answer to Florida Answering Parties' answer.

³⁸¹ SERTP Joint Answering Parties filed a joint answer to comments and protests submitted in Docket Nos. ER13-1928-000, ER13-1930-000, ER13-1935-000, ER13-1940-000, and ER13-1941-000. In its answer, SERTP Joint Answering Parties address the protest filed by Four Public Interest Organizations in this proceeding, as well protests and comments that were filed by American Wind Energy Association, Wind on the Wires, and the Wind Coalition; Wisconsin Electric Power Company, the Organization of MISO States, Public Interest Organizations, and Indiana Utility Regulatory Commission, regarding SERTP Filing Parties' compliance filings with MISO, PJM, and SPP. SERTP

(continued ...)

Company
Duke Energy Carolinas, LLC
Duke Energy Progress, Inc.
Louisville Gas and Electric Company
Ohio Valley Electric Corporation
Alabama Power Company

South Carolina Compliance Filing
Docket No. ER13-1935-000

Abbreviation	Commenter(s)
SERTP Joint Answering Parties	South Carolina Electric & Gas Company Duke Energy Carolinas, LLC Duke Energy Progress, Inc. Louisville Gas and Electric Company Ohio Valley Electric Corporation Alabama Power Company

Orlando Commission Compliance Filing
Docket No. NJ13-11-000

Abbreviation	Commenter(s)
	No reply comments were filed

Joint Answering Parties state that since these protests generally raised similar issues, they have answered all relevant pleadings in a single answer. Further, South Carolina joins this answer to the extent the pleading addresses Four Public Interest Organizations' Non-RTO Protest. SERTP Joint Answering Parties Answer at 2-3.

Appendix D: eTariff Records

The following table contains the eTariff records that are addressed in this Order on Compliance Filings. Shorthand eTariff record citations are only provided for those records that are explicitly addressed in this Order on Compliance Filings.

Filing Party Short Cite	Docket No.	Tariff Record Citation	Shorthand Tariff Record Citation
Duke Florida	ER13-1922-000	Duke Carolinas, Rate Schedules and Service Agreements, Tariff Volume No. 4 (Joint OATT of Duke Energy Carolinas, LLC, Duke Energy Florida, LLC, and Duke Energy Progress), Attachment N-2 (Transmission Planning Process (Duke Energy Florida Zone)) (0.0.0).	Duke Florida, OATT, Attachment N-2- Duke Florida (0.0.0).
Duke Florida	ER13-1922-000	Duke Florida, Tariffs, Rate Schedules and Service Agreements, Tariff Volume No. 4 (OATT), Attachment N-2, SERTP Transmission Planning Process (FRCC-SERTP Seam) (Interregional Transmission Coordination Between the FRCC and SERTP Regions) (0.0.0).	Duke Florida, OATT, Attachment N-2 - SERTP (0.0.0).
Duke Carolinas	ER13-1928-000	Duke Carolinas, Tariffs, Rate Schedules and Service Agreements, Tariff Volume No. 4 (Joint OATT of Duke Energy Carolinas, LLC, Duke Energy Florida, LLC, and Duke Energy Progress), Attachment N-1, Transmission Planning Process (Progress Zone and Duke Zone) (5.0.0).	Duke Carolinas, OATT, Attachment N-1 (5.0.0).

Duke Carolinas	ER13-1928-000	Duke Carolinas, Tariffs, Rate Schedules and Service Agreements, Tariff Volume No. 4 (Joint OATT of Duke Energy Carolinas, LLC, Duke Energy Florida, LLC, and Duke Energy Progress), Attachment N-1 - FRCC, (Interregional Transmission Coordination Between the SERTP and FRCC Regions) (4.0.0).	Duke Carolinas, OATT, Attachment N-1 – FRCC (4.0.0).
Duke Carolinas	ER13-1928-000	Duke Carolinas, Tariffs, Rate Schedules and Service Agreements, Tariff Volume No. 4 (Joint OATT of Duke Energy Carolinas, LLC, Duke Energy Florida, LLC, and Duke Energy Progress), Attachment N-1 - FRCC, (Interregional Transmission Coordination Between the SERTP and SCRTP Regions) (0.0.0).	Duke Carolinas, OATT, Attachment N-1 – SCRTP (0.0.0).
FP&L	ER13-1929-000	FP&L, FPL OATT, § 7.4 (Regional Participation) (1.1.0).	FP&L, OATT, § 7.4 (1.1.0).
FP&L	ER13-1929-000	FP&L, FPL OATT, Attachment K-1 (Interregional Transmission Coordination Between the FRCC and SERTP Regions) (0.0.0).	FP&L, FPL OATT, Attachment K-1 (0.0.0).
LG&E/KU	ER13-1930-000	LG&E/KU, Transmission, LGE and KU Pro Forma OATT, Part V, Attachment K (Transmission Planning Process) (5.0.0).	LG&E/KU, OATT, Attachment K (5.0.0).
LG&E/KU	ER13-1930-000	LG&E/KU, Transmission, LGE and KU Pro Forma OATT, Attachment K, app. 4 (Reserved) (2.0.0).	LG&E/KU, OATT, Attachment K, app. 4 (2.0.0).

LG&E/KU	ER13-1930-000	LG&E/KU, Transmission, LGE and KU Pro Forma OATT, Attachment K, app. 6 (Interregional Transmission Coordination Between the SERTP and FRCC Regions) (1.0.0).	LG&E/KU, OATT, Attachment K, app. 6 (1.0.0).
LG&E/KU	ER13-1930-000	LG&E/KU, Transmission, LGE and KU Pro Forma OATT, Attachment K, app. 9 (Interregional Transmission Coordination Between the SERTP and FRCC Regions) (1.0.0).	LG&E/KU, OATT, Attachment K, app. 9 (1.0.0).
LG&E/KU	ER13-1930-000	LG&E/KU, Transmission, LGE and KU Pro Forma OATT, Attachment K-3, Ex. K (Regional and Inter-Regional Reliability and Economic Planning Milestones Timeline) (2.0.0).	LG&E/KU, OATT, Attachment K-3, Ex. K (2.0.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 133, Attachment K (Transmission Planning Process), § 7.4 (Regional Participation) (1.1.0).	Tampa Electric, OATT, Sheet No. 133, Attachment K, § 7.4 (1.1.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142K, Attachment K, app. 5 (Interregional Transmission Coordination Between the FRCC and SERTP Regions) (0.0.0).	Tampa Electric, OATT, Sheet No. 142K, Attachment K, app. 5 (0.0.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142L, Attachment K, app. 5 (Interregional Transmission Planning Principles: Coordination and Data Exchange) (0.0.0)	Tampa Electric, OATT, Sheet No. 142L, Attachment K, app. 5 (0.0.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142M, Attachment K, app. 5 (Interregional Transmission Planning	Tampa Electric, OATT, Sheet No. 142M, Attachment K, app. 5 (0.0.0).

		Principles: Data Exchange and Joint Evaluation) (0.0.0).	
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142N, Attachment K, app. 5 (Interregional Transmission Planning Principles: Cost Allocation) (0.0.0).	Tampa Electric, OATT, Sheet No. 142N, Attachment K, app. 5 (0.0.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142O, Attachment K, app. 5 (Interregional Transmission Planning Principles: Cost Allocation) (0.0.0).	Tampa Electric, OATT, Sheet No. 142O, Attachment K, app. 5 (0.0.0).
Tampa Electric	ER13-1932-000	Tampa Electric, OATT, Sheet No. 142P, Attachment K, app. 5 (Interregional Transmission Planning Principles: Cost Allocation and Transparency) (0.0.0).	Tampa Electric, OATT, Sheet No. 142P, Attachment K, app. 5 (0.0.0).
OVEC	ER13-1940-000	OVEC, OVEC OATT, Attachment M (Transmission Planning Process) (3.0.0).	OVEC, OATT, Attachment M (3.0.0).
OVEC	ER13-1940-000	OVEC, OVEC OATT, Attachment M-1, ITC Between SERTP and FRCC, (Interregional Transmission Coordination Between the SERTP and FRCC Regions) (0.0.0).	OVEC, OATT, Attachment M-1 (0.0.0).
OVEC	ER13-1940-000	OVEC, OVEC OATT, Attachment M-4, ITC Between SERTP and SCRTP, (Interregional Transmission Coordination Between the SERTP and SCRTP Regions) (0.0.0).	OVEC, OATT, Attachment M-4 (0.0.0).
Southern Companies	ER13-1941-000	Southern Companies, OATT and Associated Service Agreements, Attachment K (The Southeastern Regional	Southern Companies, OATT, Attachment K (2.0.0).

		Transmission Planning Process) (2.0.0).	
Southern Companies	ER13-1941-000	Southern Companies, OATT and Associated Service Agreements, Exhibit K-2 ([Reserved]) (1.0.0).	Southern Companies, OATT, Ex. K-2 ([Reserved]) (1.0.0).
Southern Companies	ER13-1941-000	Southern Companies, Exhibit K-3 (Regional and Reliability Planning Milestones Timeline) (2.0.0)	Southern Companies, OATT, Ex. K-3 (2.0.0).
Southern Companies	ER13-1941-000	Southern Companies, OATT and Associated Service Agreements, Exhibit K-4 (Interregional Transmission Coordination - SERTP/FRCC Regions) (0.0.0).	Southern Companies, OATT, Ex. K-4 (0.0.0).
Southern Companies	ER13-1941-000	Southern Companies, OATT and Associated Service Agreements, Exhibit K-7 (Interregional Transmission Coordination - SERTP/SCRTP Regions) (0.0.0).	Southern Companies, OATT, Ex. K-7 (0.0.0).
Orlando Commission	NJ13-11-000	Orlando Commission, FERC Electric Tariff, Attachment K (Transmission Planning Process) (1.0.0).	Orlando Commission, FERC Electric Tariff, Attachment K (1.0.0).
SCE&G	ER13-1935-000	SCE&G, Fifth Revised Volume No. 5, Attachment K (Transmission Planning Process) (4.0.0).	SCE&G, Fifth Revised Volume No. 5, Attachment K (4.0.0).