

150 FERC ¶ 61,093
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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

Southwest Power Pool, Inc.	Docket Nos. ER13-1937-000
Midcontinent Independent System Operator, Inc.	ER13-1938-000
Southwest Power Pool, Inc.	ER13-1939-000
Midcontinent Independent System Operator, Inc.	ER13-1945-000
Entergy Services, Inc.	ER13-1955-000
Cleco Power LLC	ER13-1956-000
	(not consolidated)

ORDER ON COMPLIANCE FILINGS

(Issued February 19, 2015)

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1. On July 10, 2013, pursuant to section 206 of the Federal Power Act (FPA),¹ Southwest Power Pool, Inc. (SPP) and Midcontinent Independent System Operator, Inc. (MISO) separately submitted in Docket No. ER13-1937-000 (SPP Interregional Compliance Filing) and Docket No. ER13-1938-000 (MISO Interregional Compliance Filing), respectively,² revisions to Article IX (Coordinated Regional Transmission Expansion Planning) to the SPP-MISO Joint Operating Agreement (SPP-MISO JOA),³ to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000.⁴

2. On July 10, 2013, pursuant to section 206 of the FPA, SPP submitted in Docket No. ER13-1939-000 revisions to its Open Access Transmission Tariff (SPP Tariff) to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000, with respect to the public utility transmission providers in MISO (SPP Tariff Filing).

¹ 16 U.S.C. § 824e (2012).

² Tariff records filed by SPP and MISO are listed in Appendix D to this order.

³ SPP, FERC Electric Tariff, Rate Schedules and Seams Agreements, Rate Schedule 9, Art. IX (Coordinated Regional Transmission Expansion Planning) (0.0.0); MISO, FERC Electric Tariff, MISO Rate Schedules, Joint Operating Agreement Midwest ISO and SPP, Art. IX (Coordinated Regional Transmission Expansion Planning) (0.0.0) (collectively, SPP-MISO JOA). Unless otherwise noted, citations to the SPP-MISO JOA in this order refer to the SPP version filed in Docket No. ER13-1937-000.

⁴ *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*, No. 12-1232, 2014 WL 3973116 (D.C. Cir. Aug. 15, 2014).

3. On July 10, 2013, pursuant to section 206 of the FPA, MISO submitted in Docket No. ER13-1945-000 revisions to Attachment FF of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff (MISO Tariff) to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000, with respect to the public utility transmission providers in SPP (MISO Tariff Filing).

4. In this order, we conditionally accept, subject to further compliance filings, the SPP Interregional Compliance Filing and the MISO Interregional Compliance Filing, as discussed below. We also accept the SPP Tariff Filing and the MISO Tariff Filing, as discussed below.⁵ Additionally, we reject as moot the Entergy Compliance Filing and Cleco Compliance Filing, as discussed below.

I. Background

5. 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

⁵ We note that our determinations in this order regarding the SPP Tariff Filing and the MISO Tariff Filing are limited to the proposed procedures established for interregional transmission coordination and cost allocation between SPP and MISO. The proposed procedures for interregional transmission coordination and cost allocation between MISO and other neighboring transmission planning regions and SPP and other neighboring transmission planning regions will be addressed in separate orders in other proceedings.

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.

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 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

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 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 *Id.* P 494 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 482 n.374).

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 transmission 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

6. 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. SPP Interregional Compliance Filing (Docket No. ER13-1937-000) and MISO Interregional Compliance Filing (Docket No. ER13-1938-000)

7. SPP and MISO submit revisions to Article IX of the SPP-MISO JOA to comply with the interregional transmission coordination and cost allocation requirements of

¹² *Id.* P 493 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398).

¹³ *Id.* P 522.

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

¹⁵ Order No. 1000, FERC Stat. & Regs. ¶ 31,323 at P 603.

¹⁶ *Id.* P 400.

Order No. 1000. SPP and MISO state that they agree on many aspects of the SPP-MISO JOA revisions related to interregional transmission coordination but disagree on certain interregional cost allocation matters. SPP and MISO state that, given this disagreement, they have submitted separate compliance filings in order for the Commission to consider their respective proposals in the areas of disagreement. Specifically, SPP and MISO agree to all proposed revisions to the SPP-MISO JOA, except the proposed language in sections 9.6.3.1.iii (Criteria for Project Designation as an Interregional Project), 9.6.3.1.1 (Determination of Benefits to each RTO from Interregional Project) and 9.3.3.4.1 (Evaluating Potential Impact of Proposed Interregional Projects to Other Transmission Planning Regions). SPP and MISO request that the Commission accept their respective versions of the SPP-MISO JOA effective on the effective date of SPP's Order No. 1000 regional compliance filing in Docket No. ER13-366-000. SPP states that, in its regional compliance filing, it requested an effective date of March 30 following the Commission's acceptance of its regional compliance filing.¹⁷

B. SPP Tariff Filing (Docket No. ER13-1939-000)

8. SPP proposes revisions to the SPP Tariff to address the requirement in Order No. 1000 that the tariff identify SPP's interregional arrangements that are in the form of agreements. SPP specifies that its revisions to the SPP Tariff identify the newly proposed procedures established for interregional transmission coordination and cost allocation between SPP and its neighboring transmission planning regions (i.e., MISO, Southeastern Regional Transmission Planning (SERTP), and the Mid-Continent Area Power Pool (MAPP)).¹⁸ SPP requests an effective date commensurate with the March 30th effective date that SPP requested for SPP's Order No. 1000 regional compliance filing.¹⁹ SPP also requests waiver of Order No. 1000 interregional transmission coordination and cost allocation requirements for SPP's seam with SERTP.

C. MISO Tariff Filing (Docket No. ER13-1945-000)

9. MISO proposes revisions to Attachment FF of the MISO Tariff, which MISO states address the requirement in Order No. 1000 that the tariff identify MISO's interregional arrangements that are in the form of agreements. MISO specifies that its revisions to Attachment FF of the MISO Tariff identify the newly-proposed procedures established for interregional transmission coordination and cost allocation between MISO

¹⁷ The Commission accepted SPP's regional compliance filing effective March 30, 2014. *See Southwest Power Pool, Inc.*, 144 FERC ¶ 61,059 (2013).

¹⁸ SPP Tariff Filing, Docket No. ER13-1939-000, at 8-9.

¹⁹ *Id.* at 44.

and its neighboring transmission planning regions (i.e., PJM Interconnection LLC (PJM), SPP, and SERTP).²⁰ MISO requests an effective date of January 1, 2014 for its proposed revisions but notes that the specific agreements with regions may have different effective dates.²¹

D. Entergy and Cleco Compliance Filings (Docket Nos. ER13-1955-000 and ER13-1956-000)

10. Entergy and Cleco propose to comply with the interregional transmission coordination and cost allocation requirements of Order No. 1000 through their participation in the MISO Transmission Expansion Planning (Regional Planning) process.²² Entergy and Cleco note that, due to their then-pending integration into MISO, the Commission accepted their participation in the MISO regional transmission planning process as a means for them to comply with the regional requirements of Order No. 1000.²³

III. Notice of Filing and Responsive Pleadings

A. SPP Interregional Compliance Filing (Docket No. ER13-1937-000)

11. Notice of the SPP Interregional 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. Notices of intervention and timely motions to intervene were filed by the entities noted in Appendix A to this order.²⁴ Protests and comments were filed by the entities noted in Appendix B to this order and are addressed below. On September 24, 2013, Wind Parties submitted a comment out-of-time.

²⁰ MISO Tariff Filing, Docket No. ER13-1945-000, at 2.

²¹ *Id.* at 5.

²² See Entergy Compliance Filing, Docket No. ER13-1955-000, at 1-2; Cleco Compliance Filing, Docket No. ER13-1956-000, at 1.

²³ Entergy Compliance Filing, Docket No. ER13-1955-000, at 2; Cleco Compliance Filing, Docket No. ER13-1956-000, at 1-3 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 142 FERC ¶ 61,215 (2013) (MISO First Regional Compliance Order)).

²⁴ The entity abbreviations listed in Appendices A, B, and C are used throughout this order.

12. Answers to the SPP Interregional Compliance Filing were filed by the entities noted in Appendix C to this order and are addressed below.

B. MISO Interregional Compliance Filing (Docket No. ER13-1938-000)

13. Notice of the MISO Interregional 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. Notices of intervention and timely motions to intervene were filed by the entities noted in Appendix A to this order. Protests and comments were filed by the entities noted in Appendix B to this order and are addressed below. On September 24, 2013, Wind Parties submitted a comment out-of-time.

14. Answers to the MISO Interregional Compliance Filing were filed by the entities noted in Appendix C to this order and are addressed below.

C. SPP Tariff Filing (Docket No. ER13-1939-000)

15. Notice of the SPP Tariff 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. Notices of intervention and timely motions to intervene were filed by the entities noted in Appendix A to this order. Protests and comments were filed by the entities noted in Appendix B to this order and are addressed below. On September 24, 2013, Wind Parties submitted a comment out-of-time.

16. Answers to the SPP Tariff Filing were filed by the entities noted in Appendix C to this order and are addressed below.

D. MISO Tariff Filing (Docket No. ER13-1945-000)

17. Notice of the MISO Tariff 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. Notices of intervention and timely motions to intervene were filed by the entities noted in Appendix A to this order. On September 10, 2013, PPL Electric Companies submitted a motion to intervene out-of-time. Protests and comments were filed by the entities noted in Appendix B to this order and are addressed below. On September 24, 2013, Wind Parties submitted a comment out-of-time.

18. Answers to the MISO Tariff Filing were filed by the entities noted in Appendix C to this order and are addressed below.

E. Entergy Compliance Filing (Docket No. ER13-1955-000)

19. Notice of the Entergy 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. Notices of intervention and timely motions to intervene were filed by the entities noted in Appendix A to this order. No protests, comments, or answers were filed.

F. Cleco Compliance Filing (Docket No. ER13-1956-000)

20. Notice of the Cleco 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. Notices of intervention and timely motions to intervene were filed by the entities noted in the Appendix A to this order. No protests, comments, or answers were filed.

IV. Discussion**A. Procedural Matters**

21. 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 this proceeding. In addition, given the early stage of these proceedings and the absence of undue prejudice or delay, we grant PPL Electric Companies untimely motion to intervene.²⁵

22. 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.

23. We reject the Entergy Compliance Filing and Cleco Compliance Filing as unnecessary to meet the requirements of Order No. 1000. Because Entergy's and Cleco's integration into MISO occurred on December 19, 2013, we find that Entergy and Cleco should rely on MISO's compliance with the interregional transmission coordination and cost allocation requirements of Order No. 1000. Accordingly, we find that the Entergy Compliance Filing and Cleco Compliance Filing are moot and reject them.

²⁵ We note that, although Wind Parties filed protests in these proceedings, it did not file motions to intervene. Pursuant to Rule 102(c) and Rule 211(a)(2) of the Commission's Rules of Practice and Procedure, §§ 385.102(c), 385.211(a)(2) (2014), while Wind Parties are a protestor, they are not a party to these proceedings.

B. Substantive Matters

24. We find that the SPP Interregional Compliance Filing, the MISO Interregional Compliance Filing, the SPP Tariff Filing and the MISO Tariff Filing partially comply with the interregional transmission coordination and cost allocation requirements adopted in Order No. 1000, subject to the modifications discussed below. Accordingly, we conditionally accept these compliance filings, subject to further compliance filings, as discussed below.²⁶ We direct SPP and MISO 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

25. 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. 1000.²⁷ 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.²⁸ 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.²⁹

²⁶ We note that our determinations in this order regarding the SPP Tariff Filing and the MISO Tariff Filing are limited to the proposed procedures established for interregional transmission coordination and cost allocation between SPP and MISO. The proposed procedures for interregional transmission coordination and cost allocation between MISO and other neighboring transmission planning regions and SPP and other neighboring transmission planning regions will be addressed in separate orders in other proceedings.

²⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 415.

²⁸ *Id.* P 346; Order No. 1000-A, 139 FERC ¶ 61,132 at P 223.

²⁹ 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

26. SPP and MISO propose to comply with the interregional transmission coordination requirements of Order No. 1000 through their existing SPP-MISO JOA.³⁰ With regard to scope, SPP and MISO state that they are adjacent transmission systems in the eastern interconnection with several ties along the SPP/MISO seam. In addition, SPP and MISO propose to define an Interregional Project as a new transmission facility that may interconnect to transmission facilities under the control of both SPP and MISO.³¹

27. SPP and MISO state that they agree on and have submitted identical common language related to interregional transmission coordination but disagree on certain matters related to interregional cost allocation. As a result of their disagreement on certain revisions, SPP and MISO state that they are making separate filings to comply with the interregional cost allocation requirements of Order No. 1000 for the Commission to consider their respective proposals.³²

28. SPP and MISO request that the Commission accept their respective versions of the SPP-MISO JOA to be made effective on the effective date of SPP's regional compliance filing in Docket No. ER13-366-000. SPP states that, in its regional compliance filing, it requested an effective date of March 30 following the Commission's acceptance of its regional compliance filing.

ii. Commission Determination

29. We find that SPP and MISO have partially complied with the general interregional transmission coordination requirements of Order No. 1000. Specifically, we find that SPP and MISO 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. We find that SPP and MISO are neighboring transmission planning regions in the eastern interconnection with interconnections at several points along the SPP/MISO seam. However, SPP and

³⁰ SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 1; MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 1.

³¹ SPP, SPP-MISO JOA, art. IX, § 9.7.1 (0.0.0).

³² SPP and MISO state that they agree to all proposed revisions to the SPP-MISO JOA with the exception of sections 9.6.3.1.iii (Criteria for Project Designation as an Interregional Project), 9.6.3.1.1 (Determination of Benefits to each RTO from Interregional Project) and 9.3.3.4.1 (Evaluating Potential Impact of Proposed Interregional Projects to Other Transmission Planning Regions).

MISO partially comply with the requirement of Order No. 1000 that each pair of neighboring transmission planning regions develop the same language to describe the interregional transmission coordination procedures for that particular pair of regions. While SPP and MISO have both submitted identical common language governing interregional transmission coordination, SPP and MISO have submitted competing provisions regarding interregional cost allocation. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, further compliance filings that revise the SPP-MISO JOA to include a common interregional cost allocation method(s) consistent with our directives below in the Cost Allocation section of this order.

30. In addition, we find that SPP's and MISO's proposals to define an Interregional Project that is eligible for interregional cost allocation as a new transmission facility that may interconnect to transmission facilities under the control of both SPP and MISO is overly limiting and inconsistent with Order No. 1000's definition of an interregional transmission facility as one that is located in two or more transmission planning regions.³³ While SPP's and MISO's proposals to allow only interconnecting interregional transmission facilities to be eligible for interregional cost allocation is consistent with the requirements of Order No. 1000, limiting this interconnection to only interregional transmission facilities that interconnect to transmission facilities under the control of SPP and MISO 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.³⁴ SPP's and MISO's 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 and therefore not yet under the control of SPP or MISO. Thus, we find that this proposed definition does not comply with Order No. 1000.³⁵ Accordingly, we direct SPP and MISO to submit, within 60 days of the date

³³ 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).

³⁴ 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 Louisville Gas & Elec. Co.*, 147 FERC ¶ 61,241, at P 53 (2014); *Tampa Elec. Co.*, 148 FERC ¶ 61,172, at P 43 (2014).

³⁵ 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 (*continued ...*)

of issuance of this order, further compliance filings to revise the definition of an Interregional Project consistent with Order No. 1000, which defines an interregional transmission facility as one that is located in two or more transmission planning regions.

31. We conditionally accept certain SPP and MISO proposed revisions to the SPP-MISO JOA, to become effective March 30, 2014,³⁶ subject to the modifications discussed below. We find that SPP's and MISO's proposed effective date is reasonable because the Commission has sufficiently addressed SPP's and MISO's regional Order No. 1000 compliance filings³⁷ to allow SPP's and MISO's respective regional transmission planning and cost allocation provisions to be implemented in conjunction with the interregional transmission coordination procedures proposed in these proceedings.

b. Implementation of the Interregional Transmission Coordination Requirements

i. Data Exchange and Identifying Interregional Transmission Facilities

32. 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 to identify interregional transmission facilities.³⁸ 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

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 Co. of New Mexico*, 149 FERC ¶ 61,247, at P 24 (2014).

³⁶ The Commission accepted SPP's regional compliance filing effective March 30, 2014. *See Southwest Power Pool, Inc.*, 144 FERC ¶ 61,059 (2013).

³⁷ *See MISO First Regional Compliance Order*, 142 FERC ¶ 61,215 (2013); *Midwest Indep. Transmission Sys. Operator, Inc.*, 147 FERC ¶ 61,127 (2014). *Southwest Power Pool, Inc.*, 144 FERC ¶ 61,059.

³⁸ 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 Stat. & Regs. ¶ 31,323 at PP 399, 436.

transmission facilities that may be more efficient or cost-effective solutions to their respective regional transmission needs.³⁹ 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.⁴⁰ 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.⁴¹ 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.⁴²

33. In addition, 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.⁴³ 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.⁴⁴

(a) Compliance Filings

34. SPP and MISO propose that each party shall provide the other with the following data and information on an annual basis: (1) power flow models for projected system conditions for the planning horizon (up to the next 10 years) that include planned generation development and retirements, planned transmission facilities and seasonal load projections; (2) system stability models with detailed dynamic modeling of generators and other active elements; (3) production cost models that include planned

³⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 396; *id.* P 398.

⁴⁰ *Id.* P 454.

⁴¹ *Id.* P 455.

⁴² *Id.*

⁴³ *Id.* P 436, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 506.

⁴⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

generation development and retirements, load forecasts, and planned transmission facilities; (4) assumptions used in development of above power flow, stability and production cost models; and (5) contingency lists for use in power flow, stability, and production cost analyses.⁴⁵

35. SPP and MISO also propose to exchange the following types of data upon either party's request and provide it within 30 calendar days from the date of such request or on a mutually agreed schedule: (1) any updates to data exchanged in accordance with the annual data exchange requirements; (2) short-circuit models for transmission systems; (3) the regional plan document produced by the party, the timing of each planned enhancement, estimated completion dates, and indications of the likelihood a system enhancement will be completed; (4) the status of expansion studies, such that each party has knowledge that a commitment has been made to a system enhancement as a result of any such studies; (5) transmission system maps in electronic format for the party's bulk transmission system and lower voltage transmission system maps that are relevant to the interregional transmission coordination between the two parties; (6) breaker diagrams for the specified portion(s) of the party's transmission system; (7) identification and status of interconnection and long-term firm transmission service requests that have been received, including associated studies; (8) long-term or short-term reliability assessment documents produced by the party and any operating assessment reports produced by the party; and (9) such other data and information as is needed for each party to plan its own system accurately and reliably and to assess the impact of conditions existing on the system of the other party.⁴⁶

36. SPP and MISO also propose to share, on an ongoing basis, information that arises in the performance of single party planning activities as necessary or appropriate for effective interregional transmission coordination between the parties, including information on requests received from generation resources that plan on permanently retiring or suspending operation, and the identification of proposed transmission system enhancements that may affect the parties' respective systems.⁴⁷ SPP and MISO propose

⁴⁵ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 10; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 11-12 (citing SPP, SPP-MISO JOA, art. IX, § 9.2.1 (0.0.0)).

⁴⁶ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 10-11; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 12-13 (citing SPP, SPP-MISO JOA, art. IX, § 9.2.2 (0.0.0)).

⁴⁷ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 9; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 11 (citing SPP, IX, § 9.3.1 (1.0.0)).

that, in a year where a Coordinated System Plan study⁴⁸ is not being performed, the Joint Planning Committee⁴⁹ and the Interregional Planning Stakeholder Advisory Committee⁵⁰ will conduct an annual evaluation of transmission issues (which include potential interregional transmission solutions).⁵¹ According to SPP and MISO, the Interregional Planning Stakeholder Advisory Committee will meet at least annually⁵² to review and discuss any proposed transmission issues (including proposed interregional transmission solutions), including the analysis to support recommended issues for evaluation.⁵³ SPP and MISO state that the Joint Planning Committee and the Interregional Planning Stakeholder Advisory Committee may meet more frequently, as determined by the Joint Planning Committee, when performing a Coordinated System Plan study.⁵⁴ SPP and MISO propose that transmission issues can be identified by MISO, SPP, or any other entity.⁵⁵

⁴⁸ “The primary purpose of coordinated system planning is to ensure that coordinated analyses are performed to identify expansions or enhancements to transmission system capability needed to maintain reliability, improve reliability, improve operational performance, or enhance the efficiency of electricity markets. Any such expansions or enhancements shall be described in a Coordinated System Plan.” SPP, SPP-MISO JOA, art. IX, § 9.3 (1.0.0).

⁴⁹ The Joint Planning Committee is comprised of staff representatives from both SPP and MISO and is the decision making body for coordinated interregional transmission planning under the SPP-MISO JOA. The responsibilities and activities of the Joint Planning Committee are detailed in sections 9.1.1 and 9.1.1.1 of the SPP-MISO JOA. *See* SPP, SPP-MISO JOA, art. IX, § 9.1.1 (1.0.0); SPP, SPP-MISO JOA, art. IX, § 9.1.1.1 (0.0.0).

⁵⁰ The Interregional Planning Stakeholder Advisory Committee is open to all stakeholders from both regions and provides guidance and recommendations to the Joint Planning Committee. The responsibilities and activities of the Interregional Planning Stakeholder Advisory Committee are detailed in sections 9.1.2 and 9.1.2.2 of the SPP-MISO JOA. *See* SPP, SPP-MISO JOA, art. IX, § 9.1.2 (1.0.0); SPP, SPP-MISO JOA, art. IX, § 9.1.2.2 (1.0.0).

⁵¹ SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

⁵² SPP, SPP-MISO JOA, art. IX, § 9.3.2.2 (0.0.0).

⁵³ SPP, SPP-MISO JOA, art. IX, § 9.3.2.3 (0.0.0).

⁵⁴ SPP, SPP-MISO JOA, art. IX, § 9.3.2 (1.0.0).

⁵⁵ SPP, SPP-MISO JOA, art. IX, § 9.3.2 (1.0.0).

37. SPP and MISO further propose that, 60 calendar days before the annual meeting of the Interregional Planning Stakeholder Advisory Committee, a notification of the meeting shall be posted on each party's interregional coordination website and circulated through applicable electronic distribution lists, inviting interested entities to submit transmission issues, which can also include related solutions.⁵⁶ SPP and MISO propose that transmission issues, which may include associated solutions, together with any supporting analysis must be submitted at least 30 calendar days before the annual Interregional Planning Stakeholder Advisory Committee meeting.⁵⁷ SPP and MISO also propose that, if an entity other than SPP and MISO submits an identified transmission issue to the Joint Planning Committee, then that entity is responsible for providing analysis to support the recommended transmission issue.⁵⁸ SPP and MISO propose that the Interregional Planning Stakeholder Advisory Committee shall review transmission issues at its annual meeting.⁵⁹ SPP and MISO propose that the Joint Planning Committee may call other meetings to review transmission issues, after providing 14 calendar days advance notice.⁶⁰ SPP and MISO propose that the Interregional Planning Stakeholder Advisory Committee shall vote on whether to submit a recommendation to the Joint Planning Committee to perform a Coordinated System Plan study.⁶¹

38. SPP and MISO propose that the Joint Planning Committee will review the recommendation from the Interregional Planning Stakeholder Advisory Committee and all submitted transmission issues to determine the need for a Coordinated System Plan study. SPP and MISO propose that the Joint Planning Committee will determine whether to perform a Coordinated System Plan study within 45 calendar days of the Interregional Planning Stakeholder Advisory Committee's recommendation to perform such a study.⁶² SPP and MISO propose that a Coordinated System Plan study can be initiated: (1) if each party in the Joint Planning Committee votes in favor of performing the Coordinated System Plan study; or (2) if after two consecutive years in which a Coordinated System Plan study has not been initiated, one party votes in favor of performing a Coordinated

⁵⁶ SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

⁵⁷ SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

⁵⁸ SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

⁵⁹ SPP, IX, § 9.3.2.2 (0.0.0).

⁶⁰ SPP, IX, § 9.3.2.3 (0.0.0).

⁶¹ SPP, SPP-MISO JOA, art. IX, § 9.3.2.3 (0.0.0).

⁶² SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0).

System Plan study.⁶³ SPP and MISO propose that the Joint Planning Committee's notification to the Interregional Planning Stakeholder Advisory Committee regarding the Joint Planning Committee's determination of whether or not to perform a study will be within 30 calendar days of the Joint Planning Committee's determination of whether or not to perform a study and that the start date of the Coordinated System Plan study will be within 180 calendar days of the Joint Planning Committee's determination to conduct a study.⁶⁴ SPP and MISO also propose that either party may propose an Interregional Planning Stakeholder Advisory Committee meeting to review the Joint Planning Committee's determination to conduct a Coordinated System Plan study within 30 days of the Joint Planning Committee's determination.⁶⁵

39. SPP and MISO propose that, at the beginning of the Coordinated System Plan study, the Joint Planning Committee will develop, with input from the Interregional Planning Stakeholder Advisory Committee, the scope for the Coordinated System Plan study.⁶⁶ SPP and MISO propose that the scope includes, but is not limited to: (1) identification of transmission issues to be evaluated; (2) joint model(s) that will be developed including assumptions; (3) types of analysis, including, but not limited to, joint futures development, congestion analysis, reliability analysis, and stability analysis; (4) study timeline, not exceeding 18 months from the first Interregional Planning Stakeholder Advisory Committee meeting discussing the study scope; and (5) deliverables.⁶⁷ SPP and MISO propose that the Coordinated System Plan study will be completed within no more than 18 months depending on the study scope.⁶⁸ SPP and MISO propose that the Joint Planning Committee will be responsible for facilitating the development of a joint and common model(s) that shall be used for the Coordinated System Plan study.⁶⁹ SPP and MISO propose that the type of analysis or study will be

⁶³ SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0).

⁶⁴ SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0).

⁶⁵ SPP, SPP-MISO JOA, art. IX, § 9.3.2.5 (0.0.0).

⁶⁶ SPP, SPP-MISO JOA, art. IX, § 9.3.3.1 (0.0.0).

⁶⁷ SPP, SPP-MISO JOA, art. IX, § 9.3.3.1 (0.0.0).

⁶⁸ SPP, SPP-MISO JOA, art. IX, § 9.3.3.1 (0.0.0).

⁶⁹ SPP, SPP-MISO JOA, art. IX, § 9.3.3.2 (0.0.0).

based on the transmission issues to be studied and the applicable benefit metrics for evaluating potential solutions.⁷⁰

40. During the Coordinated System Plan study, SPP and MISO propose that potential Interregional Projects can be proposed by MISO, SPP, their respective stakeholders, or other entities. Specifically, the Joint Planning Committee shall request, through each party's applicable distribution lists and each party's respective interregional coordination webpage, suggestions for transmission solutions from third parties to address the transmission issues identified in the Coordinated System Plan study. SPP and MISO propose that the transmission solutions shall be considered by the Joint Planning Committee and reviewed with the Interregional Planning Stakeholder Advisory Committee.⁷¹ SPP and MISO reason that the proposed timeline will enable the interregional process to consider Interregional Projects proposed to benefit SPP and MISO, while the individual regional processes consider the proposals.⁷²

(b) Comments and Protests

41. Organization of MISO States raises concerns about the term "transmission issue," as proposed by both SPP and MISO in their proposed versions of the SPP-MISO JOA.⁷³ Organization of MISO States contends that the SPP-MISO JOA should explicitly state that reliability, economic, and public policy-related "transmission issues" will be considered by the SPP-MISO Interregional Planning Stakeholder Advisory Committee and Joint Planning Committee. Further, Organization of MISO States notes that the term "transmission issue" is not a capitalized, defined term in either the SPP or MISO compliance filings and that, while it is capitalized in the Coordinated System Plan Study Scope Development section of MISO's version of the SPP-MISO JOA, it is not capitalized consistently throughout MISO's compliance filing, such as in the proposed Annual Transmission Issues Evaluation section of the SPP-MISO JOA.⁷⁴ Organization

⁷⁰ SPP, SPP-MISO JOA, art. IX, § 9.3.3.3 (0.0.0).

⁷¹ SPP, SPP-MISO JOA, art. IX, § 9.3.3.4 (0.0.0).

⁷² MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 16; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 18.

⁷³ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 16 (filed Sept. 9, 2013).

⁷⁴ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 16 (filed Sept. 9, 2013) (citing SPP, SPP-MISO JOA, art. IX, §§ 9.3.3.1 & 9.3.2 (0.0.0)).

of MISO States asserts that the term should be defined in the SPP-MISO JOA to ensure that reliability, economic, and public policy concerns can be potential “transmission issues” for interregional consideration.⁷⁵

42. Multiple parties raise concerns about whether SPP and MISO could be required to study interregional projects and how frequently such studies should take place. Wind Parties point out that SPP and MISO proposed to specify in the SPP-MISO JOA revisions that the two regions will annually consider the interregional transmission issues identified by each party and by third parties and that a Coordinated System Plan study will be conducted if (1) both SPP and MISO agree that one is needed, or (2) if a Coordinated System Plan study has not been conducted for two consecutive years, a study will be conducted in the third year if at least one of the parties votes in favor of a study.⁷⁶ Wind Parties support the inclusion of a backstop provision to allow a single region to initiate a Coordinated System Plan because the second provision above may not be sufficient to ensure that all cost-effective and efficient interregional projects are considered and evaluated and the requirement that two years pass without agreement between the two RTOs before the backstop mechanism applies will result in an unnecessary delay in studying potentially beneficial projects. Arkansas Electric similarly argues that providing each RTO the ability to delay an interregional study for two years does not take into account the potential benefits of more efficient and cost-effective interregional facilities to entities such as Arkansas Electric that have load and generation on both sides of the SPP-MISO seam.⁷⁷ Arkansas Electric adds that an affirmative vote by a single RTO should be sufficient to require the initiation of a Coordinated System Plan, unless a study was initiated the previous year.

43. ATC/Duke contends that the Commission should direct SPP and MISO to establish a required minimum frequency for conducting Coordinated System Plan studies because otherwise the RTOs will risk not identifying interregional transmission facilities to more efficiently and cost-effectively address local and regional transmission needs.⁷⁸

⁷⁵ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 16 (filed Sept. 9, 2013).

⁷⁶ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 9 n.13 (filed Sept. 24, 2013) (citing SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0)).

⁷⁷ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 4-5 (filed Sept. 9, 2013).

⁷⁸ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 2 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 346).

ATC/Duke also argues that the process does not ensure that the RTOs are identifying interregional solutions that may resolve each region's needs more efficiently or cost-effectively, despite SPP's and MISO's claim that the SPP-MISO JOA provisions comply with the "same general timeframe" requirement for joint evaluation, because the Joint Planning Committee will review each RTO's annual regional plan on an annual basis and incorporate the regional plans into the RTOs' Coordinated System Plan.⁷⁹ ATC/Duke also argues that the Coordinated System Planning section of the SPP-MISO JOA gives SPP and MISO too much discretion as to when, or if, they will conduct a Coordinated System Plan study and evaluate proposed interregional projects from the RTOs, developers, and other stakeholders.⁸⁰ ATC/Duke contends that, despite an annual review of transmission issues by the Joint Planning Committee and input by the stakeholder

⁷⁹ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5-6 (filed Sept. 9, 2013) (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 15-16).

⁸⁰ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6 (filed Sept. 9, 2013) (citing SPP, SPP-MISO JOA, art. IX, § 9.3 (1.0.0)).

committee,⁸¹ there does not appear to be any requirement that the RTOs jointly evaluate any projects if neither RTO requests a Coordinated System Plan study. ATC/Duke asserts that this does not satisfy the Order No. 1000 requirement that regions must identify and jointly evaluate proposed interregional transmission facilities⁸² and do so within the same general time frame as each transmission planning region's individual consideration of the proposed project.⁸³

44. Wind Parties also raise concerns that the SPP-MISO process will not study interregional projects proposed by stakeholders other than the RTOs, especially merchant transmission projects, in order to protect the RTOs and their member transmission owners' interests.⁸⁴ Wind Parties point to the fact that the Interregional Planning Stakeholder Advisory Committee has the opportunity to provide input regarding the need for a Coordinated System Plan, but only SPP or MISO staff on the two RTOs' Joint Planning Committee can cause a Coordinated System Plan to be conducted. Wind Parties request that the Commission require SPP and MISO to develop a mechanism for third parties to initiate a Coordinated System Plan that will not permit the RTOs to reject evaluation of third party proposed projects to protect their own interests.⁸⁵

45. Public Interest Organizations further note that the Process for Submitting Transmission Issues for Review section of the SPP-MISO JOA states that “[i]f a Third Party submits an identified transmission issue to the Joint Planning Committee, then that Third Party is responsible for providing analysis to support the recommended

⁸¹ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6-7 (filed Sept. 9, 2013) (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 13).

⁸² ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 7 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 345, 435).

⁸³ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 7 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

⁸⁴ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 9 n.15 (filed Sept. 24, 2013).

⁸⁵ *Id.* 9-10.

transmission issue.”⁸⁶ Public Interest Organizations object to placing on third parties the burden of providing the analysis to support a recommended transmission issue for study. Public Interest Organizations assert that the third party should only be required to provide enough information for the Joint Planning Committee, in consultation with the Interregional Planning Stakeholder Advisory Committee, to evaluate the issue in more detail and, if necessary, perform additional analysis using the RTOs’ resources. Public Interest Organizations contend that few parties, including independent transmission companies, have the technical resources to conduct all of the analysis that the SPP-MISO JOA indicates may be necessary.⁸⁷

(c) **Answers**

46. In response to ATC/Duke’s, Wind Parties’, and Public Interest Organizations’ concerns about whether interregional projects will be jointly evaluated and the minimum frequency with which they are evaluated, SPP and MISO state that they have committed to the annual exchange of regional plans and the joint review of transmission issues. SPP and MISO note that the annual review of transmission issues will include stakeholder involvement through the Interregional Planning Stakeholder Advisory Committee and allow stakeholders to submit proposed solutions for consideration. SPP and MISO contend that the Coordinated System Plan study process satisfies and goes beyond the requirements of Order No. 1000 because it includes interregional planning in addition to interregional transmission coordination on the regional evaluation of potential interregional projects.⁸⁸ SPP and MISO further contend that requiring that a Coordinated

⁸⁶ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 10 (filed Sept. 9, 2013) (citing SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0)).

⁸⁷ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 10 (filed Sept 9, 2013).

⁸⁸ MISO notes that certain parties also requested that the Commission accept SPP’s proposed section 9.3.3.4.1 regarding evaluation of the impacts of proposed interregional projects on neighboring systems. *See* East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 8-9 (filed Sept. 9, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 15-17 (filed Sept. 9, 2013). As discussed in MISO’s September 9, 2013 protest in Docket No. ER13-1937, at 8-10, MISO has proposed Tariff language in its July 22, 2013 regional compliance filing in Docket No. ER3-187-003 that addresses the potential reliability-related impacts of Market Efficiency Projects and Multi-Value Projects on other transmission planning regions during its regional planning process. Since MISO proposes that interregional projects with SPP qualify as Market Efficiency Projects under (*continued ...*)

System Plan study be performed annually, regardless of whether such a study is necessary, would be resource-intensive and potentially wasteful.⁸⁹

47. MISO states that it agrees with the Organization of MISO States' assertion that the meaning of transmission issues is intended to cover economic, reliability, and public-policy related issues. MISO states that, if the Commission shares the Organization of MISO States' concern, MISO would not be opposed to adding "Transmission Issue" as a defined term in the SPP-MISO JOA for purposes of clarity.⁹⁰ SPP also states that it supports the Organization of MISO States' request to revise the SPP-MISO JOA to define the term "transmission issue" to mean reliability, economic, and public policy concerns. SPP states that it supports requiring the Joint Planning Committee and Interregional Planning Stakeholder Advisory Committee to review transmission issues (including reliability, economic and public policy concerns) for potential interregional solutions.⁹¹

(d) Commission Determination

48. We find that the SPP-MISO JOA partially complies with the data and information exchange requirements of Order No. 1000. We find that the SPP-MISO JOA complies with the requirement to adopt interregional transmission coordination procedures that provide for the exchange of transmission planning data and information at least annually. The proposed tariff language requires SPP and MISO to share their regional transmission plans, upon request, and requires SPP and MISO to share planning data and information annually.⁹² Specifically, among other things, SPP and MISO will exchange power flow

MISO's Tariff, when Market Efficiency Projects that are proposed interregional projects are evaluated in MISO's regional process, their potential reliability impacts on other transmission planning regions will also be addressed. If so required by the Commission, MISO states that it would be willing to include a similar provision in the SPP-MISO JOA, focused on reliability-related impacts. MISO Answer, Docket No. ER13-1938-000, at 12 n.38 (filed Nov. 4, 2013).

⁸⁹ MISO Answer, Docket No. ER13-1938-000, at 12 (filed Nov. 4, 2013). SPP Answer, Docket No. ER13-1937-000, at 7 (filed Nov. 4, 2013).

⁹⁰ MISO Answer, Docket No. ER13-1938-000, at 17 (filed Nov. 4, 2013) (citing Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 17 (filed Sept. 9, 2013)).

⁹¹ SPP Answer, Docket No. ER13-1937-000, at 5-6 (filed Nov. 4, 2013).

⁹² SPP, SPP-MISO JOA, art. IX, §§ 9.2.1 (0.0.0) & 9.2.2 (0.0.0).

models for projected system conditions for the planning horizon (up to the next 10 years) that include planned generation development and retirements, planned transmission facilities and seasonal load projections, system stability models, production cost models, and the underlying assumptions and contingency lists used in those models. In addition, the SPP-MISO JOA includes proposed revisions requiring SPP and MISO to provide other data and information needed for each to plan its own system accurately and reliably and to assess the impact of conditions existing on the system of the other party.⁹³

49. We also find that SPP's and MISO's proposals comply with the requirements to identify interregional transmission facilities. The Coordinated System Planning section of the SPP-MISO JOA provides for single party planning and the development of a Coordinated System Plan which will serve to ensure that coordinated analyses are performed to identify expansions or enhancements to transmission system capability needed to maintain reliability, improve operational performance or enhance the efficiency of electric markets.⁹⁴ Specifically, the proposed SPP-MISO JOA language requires SPP and MISO to review transmission issues, which may include related transmission solutions, identified by SPP, MISO or any third party for interregional evaluation.⁹⁵

50. We find that SPP's and MISO's proposals comply with Order No. 1000's requirement that public utility transmission providers in neighboring transmission planning regions include a description of the types of transmission studies conducted to evaluate conditions on their neighboring transmission systems for the purposes of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities. Specifically, the proposed SPP-MISO JOA includes provisions for the identification and evaluation of transmission issues; the initiation, scoping and timing of Coordinated System Plan studies; the types of models and analyses conducted during Coordinated System Plan studies; and the ability of SPP, MISO or third parties to propose projects during the coordinated system planning process.⁹⁶ While the SPP-MISO JOA does not explicitly state that SPP and MISO will review transmission issues related to regional transmission needs driven by reliability, economics, and public policy requirements,⁹⁷ SPP and MISO stated in their answers that

⁹³ SPP, SPP-MISO JOA, art. IX, § 9.2.2 (0.0.0).

⁹⁴ SPP, SPP-MISO JOA, art. IX, § 9.3 (0.0.0).

⁹⁵ SPP, SPP-MISO JOA, art. IX, § 9.3.2 (0.0.0).

⁹⁶ SPP, SPP-MISO JOA, art. IX, §§ 9.3 (0.0.0), 9.3.2.1, 9.3.2.2, 9.3.2.3, 9.3.2.4, 9.3.3.1, 9.3.3.2, 9.3.3.3, 9.3.3.4.

⁹⁷ Order No. 1000 defined Public Policy Requirements as requirements established by local, state or federal laws or regulations (i.e., enacted statutes passed by the *(continued ...)*)

they intend to do so and are not opposed to defining “transmission issue” to explicitly cover these issues. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to include “Transmission Issue” as a defined term in the SPP-MISO JOA that includes issues related to regional transmission needs driven by reliability, economics, and public policy requirements.

51. We deny ATC/Duke’s and Wind Parties’ request that the Commission require SPP and MISO to conduct a Coordinated System Plan study more frequently. The proposed SPP-MISO JOA language provides that a Coordinated System Plan study will be performed (1) if each party in the Joint Planning Committee votes in favor of conducting a Coordinated System Plan study; or (2) if after two consecutive years a Coordinated System Plan study has not been performed and either SPP or MISO votes in favor of conducting such study.⁹⁸ We agree with SPP and MISO that Order No. 1000 does not require a Coordinated System Plan study to be performed more frequently. However, we note that, even when a Coordinated System Plan is not performed, stakeholders and developers can propose an interregional transmission facility for joint evaluation. In particular, the SPP-MISO JOA provides that, in a year where a Coordinated System Plan study is not being performed, the Joint Planning Committee and the Interregional Planning Stakeholder Advisory Committee will conduct an annual evaluation of transmission issues (which include potential interregional transmission solutions).⁹⁹ The Interregional Planning Stakeholder Advisory Committee will meet at least annually¹⁰⁰ to review and discuss any proposed transmission issues (including proposed interregional transmission solutions), including the analysis to support recommended issues for evaluation.¹⁰¹ Thus, an interregional transmission facility can be proposed for joint evaluation even if the more in-depth evaluation associated with a Coordinated System Plan study is not being performed during a particular year.

legislature and signed by the executive and regulations promulgated by a relevant jurisdiction, whether within a state or at the federal level). Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 2. Order No. 1000-A clarified that Public Policy Requirements included local laws and regulations passed by a local governmental entity, such as a municipal or county government. Order No. 1000-A, 139 FERC ¶ 61,132 at P 319.

⁹⁸ SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0).

⁹⁹ SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

¹⁰⁰ SPP, SPP-MISO JOA, art. IX, § 9.3.2.2 (0.0.0).

¹⁰¹ SPP, SPP-MISO JOA, art. IX, § 9.3.2.3 (0.0.0).

52. However, we agree with Public Interest Organizations that the provision requiring an entity to provide the analysis to support a transmission issue it proposes for consideration is vague and potentially unduly burdensome on third party stakeholders.¹⁰² In Order No. 1000-A, the Commission clarified that each public utility transmission provider must describe in its OATT how its regional transmission planning process will enable stakeholders to provide meaningful and timely input with respect to the consideration of interregional transmission facilities.¹⁰³ The Commission also required each public utility transmission provider to 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.¹⁰⁴ We therefore find that this requirement may unreasonably prevent third parties from submitting transmission issues that they believe need to be addressed because they do not possess the technical expertise of the regional planning authorities to conduct the appropriate analysis of the transmission issue. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to remove the requirement that third parties must provide the analysis to support recommended transmission issues.

53. Finally, we find that SPP's and MISO's proposals comply with the requirement to explain how stakeholders and transmission developers can propose interregional transmission facilities for joint evaluation. The proposed SPP-MISO JOA language states that SPP and MISO shall solicit, and any entity can propose, suggestions for transmission solutions to identified transmission issues.¹⁰⁵

ii. Procedure for Joint Evaluation

54. 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.¹⁰⁶ The submission of an interregional transmission project in each regional transmission

¹⁰² SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).

¹⁰³ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

¹⁰⁴ *Id.* P 522.

¹⁰⁵ SPP, SPP-MISO JOA, art. IX, § 9.3.3.4 (0.0.0).

¹⁰⁶ 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 Data Exchange and Identifying Interregional (*continued ...*)

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.¹⁰⁷

55. 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.¹⁰⁸ 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 review and use in the regional transmission planning process information developed in the interregional transmission coordination procedures.¹⁰⁹

56. 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.¹¹⁰ Additionally, the Commission directed each public utility transmission provider to develop procedures by which differences in the data,

Transmission Facilities 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.

¹⁰⁷ 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.

¹⁰⁸ 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 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439).

¹⁰⁹ 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.

¹¹⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at 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. Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 398.

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.¹¹¹

(a) **Compliance Filings**

57. SPP and MISO state that they have developed a procedure to jointly evaluate interregional transmission facilities that are proposed to be located in their neighboring transmission planning regions.¹¹² SPP and MISO state that the interregional process is implemented by the Joint Planning Committee, which is made up of representatives from the staff of SPP and MISO.¹¹³ SPP and MISO further state that the Joint Planning Committee will consider stakeholder inputs that are facilitated by the Interregional Planning Stakeholder Advisory Committee. After completion of the Coordinated System Plan study, SPP and MISO propose that the Joint Planning Committee shall produce a draft report documenting the transmission issues evaluated, studies performed, solutions considered, and, if applicable, the recommended Interregional Projects with the associated interregional cost allocation. SPP and MISO state that they will provide this report to the Interregional Planning Stakeholder Advisory Committee for review and feedback and the updated Coordinated System Plan study report will be posted on their respective interregional transmission coordination websites.¹¹⁴ SPP and MISO propose that SPP and MISO would then consider any recommended interregional solution in their respective regional transmission planning processes.¹¹⁵ SPP and MISO note that each proposed Interregional Project needs to be approved by both regional processes to be implemented as an Interregional Project as a part of a Coordinated System Plan.¹¹⁶ As

¹¹¹ 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.

¹¹² MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 8; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 10.

¹¹³ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 9; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 11.

¹¹⁴ SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.1 (0.0.0).

¹¹⁵ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 9; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 11.

¹¹⁶ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 9; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 11.

discussed further below, SPP and MISO assert that the revisions to the SPP-MISO JOA and their respective OATTs satisfy the joint evaluation procedures requirement in Order No. 1000.¹¹⁷

58. SPP and MISO state they have developed a timeline for the joint evaluation of Interregional Projects that is within the same general timeframe as their respective regional processes.¹¹⁸ SPP and MISO propose that the Joint Planning Committee recommendation of an Interregional Project(s) shall be reviewed by each region through its respective regional processes within six months of the Joint Planning Committee recommendation. SPP and MISO add that the Joint Planning Committee may grant one or both regions additional time for its review. SPP and MISO propose that, if the recommended Interregional Project is not approved by the regions within six months or any Joint Planning Committee approved extension, the proposed Interregional Project is “deemed rejected.”¹¹⁹ SPP and MISO propose that the rejected Interregional Project may be reevaluated and recommended by the Joint Planning Committee as part of a future Coordinated System Plan study.¹²⁰

59. SPP and MISO propose that the Joint Planning Committee responsibilities include preparing and documenting detailed procedures for the development of power system analysis models. SPP and MISO propose that at a minimum, and unless otherwise agreed, the Joint Planning Committee will develop common power system analysis models to perform coordinated system planning, as well as models for power flow analysis, short circuit analyses, and stability analyses. SPP and MISO propose that the Joint Planning Committee will direct the performance of a detailed review of the appropriateness of applicable power system models for studies of interconnections in close electrical proximity at the boundaries between the SPP and MISO systems. SPP and MISO propose that the Joint Planning Committee will also assure that the models used in the interregional evaluation by each planning region are sufficiently similar. SPP and MISO propose that the Joint Planning Committee agree upon the models that are used to ensure confidence in the results.¹²¹ SPP and MISO propose that, at the beginning

¹¹⁷ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 7; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 9.

¹¹⁸ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 15; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 17.

¹¹⁹ SPP, SPP-MISO JOA, art. IX, § 9.3.3.6 (0.0.0).

¹²⁰ SPP, SPP-MISO JOA, art. IX, § 9.3.3.6 (0.0.0).

¹²¹ SPP, SPP-MISO JOA, art. IX, §§ 9.1.1.1.i and 9.1.1.1.ii (0.0.0).

of the Coordinate System Plan study, the Joint Planning Committee develop, with input from the Interregional Planning Stakeholder Advisory Committee, the scope for the Coordinated System Plan study, which shall include joint model(s) that will be developed including assumptions.¹²²

60. SPP and MISO propose that the Joint Planning Committee will be responsible for facilitating the development of a joint and common model(s) that will be used for the Coordinated System Plan study. SPP and MISO propose that the joint and common model(s) will be used by the Joint Planning Committee to perform all analysis related to the joint evaluation of Interregional Projects and will be based on the assumptions defined in the scope for the Coordinated System Plan study. SPP and MISO propose that stakeholders may provide input on the joint and common model(s) developed for the Coordinated System Plan study through the Interregional Planning Stakeholder Advisory Committee.¹²³

(b) Comments and Protests

61. ATC/Duke asserts that the Commission should direct SPP and MISO to develop procedures for jointly evaluating all projects identified by developers and other stakeholders in the Coordinated System Plan study.¹²⁴ ATC/Duke states that SPP's and MISO's proposal falls short of the Commission's requirement for regions to develop and implement procedures to evaluate proposed interregional projects¹²⁵ ATC/Duke states that transmission providers may be unable to identify more efficient or cost effective solutions to the individual needs identified in the local and regional transmission planning processes,¹²⁶ which will create uncertainty regarding whether their proposed interregional projects will be jointly evaluated by SPP and MISO as Order No. 1000 requires.¹²⁷ ATC/Duke argues that the proposed SPP-MISO JOA provisions would allow the RTOs

¹²² SPP, SPP-MISO JOA, art. IX, § 9.3.3.1(2) (0.0.0).

¹²³ SPP, SPP-MISO JOA, art. IX, § 9.3.3.2 (0.0.0).

¹²⁴ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 2 (filed Sept. 9, 2013).

¹²⁵ *Id.* 2-3 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 345).

¹²⁶ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 2-4 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 368).

¹²⁷ ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Sept. 9, 2013).

to decide which projects they will study in the proposed Coordinated System Plan study.¹²⁸

62. Public Interest Organizations similarly assert that an interregional project that is under evaluation in both regional planning processes should be studied in the interregional planning process. Public Interest Organizations contend that, if both RTOs have chosen to study an interregional project in their regional process, they should not object to an interregional study applying common models, assumptions and other data to the project. Public Interest Organizations recommend requiring either a full Coordinated System Plan study or some more specific study whenever an interregional project is under review in both regional planning processes.¹²⁹

63. Wind Parties and Public Interest Organizations are concerned that the proposed SPP-MISO JOA revisions regarding the harmonization of models and assumptions between the two regions lack procedures for identifying and resolving differences in data, models, assumptions, planning horizons, and criteria exchanged for the purpose of evaluating potential facilities. Public Interest Organizations note that the proposed SPP-MISO JOA states that the Joint Planning Committee will develop joint models (including assumptions) and other analytical information necessary to carry out joint studies.¹³⁰ Public Interest Organizations contend that the proposal does not establish any procedures related to the development of those models or for reconciling differences in assumptions or other inputs. Public Interest Organizations contend that, without some procedure for resolving differences in assumptions, the proposed SPP-MISO JOA fails to comply with the Order No. 1000 directive to “develop procedures by which such differences can be identified and resolved for purposes of jointly evaluating the proposed interregional transmission facility.”¹³¹ Wind Parties request that the Commission direct SPP and MISO to provide details on the procedures they will use to resolve any differences in models, data, and scenarios used for interregional planning studies.¹³²

¹²⁸ *Id.* 8 (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 12-16).

¹²⁹ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 9-10 (filed Sept. 9, 2013).

¹³⁰ *Id.* 7 (citing SPP, SPP-MISO JOA, art. IX, § 9.3.3.1 (0.0.0)).

¹³¹ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 7-8 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 437).

¹³² Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, (continued ...)

(c) Answers

64. In response to ATC/Duke's request that the Commission require SPP and MISO to jointly evaluate all proposed interregional projects identified by developers and other stakeholders,¹³³ SPP and MISO reiterate that they have already agreed to an interregional planning process that goes beyond the requirements of Order No. 1000. SPP and MISO state that on an annual basis the RTOs will coordinate and review with stakeholders identified transmission issues, including proposed solutions. SPP and MISO contend that this process is more than sufficient to meet the requirements of Order No. 1000. SPP and MISO state that they will continue to give due consideration to transmission issues that may be identified by stakeholders and third parties, but that it is unnecessary, and not required by Order No. 1000, for SPP and MISO to commit to fully evaluate any and every project that may be submitted without any preliminary screening. SPP and MISO aver that, just as some initial evaluation is reasonable to determine what transmission needs should be studied further,¹³⁴ it is also reasonable to perform similar preliminary evaluation on the proposed solutions for such needs. SPP and MISO cite to the finding in Order No. 1000 that it is reasonable for a transmission provider to "identify, out of this larger set of needs, those needs for which transmission solutions will be evaluated"¹³⁵ and that Order No. 1000 does not require that every potential transmission need proposed by stakeholders must be selected for further evaluation."¹³⁶ They further assert that, to the extent protestors believe Order No. 1000 should have required both interregional planning and evaluation of every project that stakeholders would recommend, such

ER13-1939-000, and ER13-1945-000, at 8 (filed Sept. 24, 2013) (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 11, SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 13).

¹³³ MISO Answer, Docket No. ER13-1938-000, at 13 (filed Nov. 4, 2013) and SPP Answer, Docket No. ER13-1937-000, at 7-8 (filed Nov. 4, 2013) (citing ATC/Duke Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 10 (filed Sept. 9, 2013)).

¹³⁴ MISO Answer, Docket No. ER13-1938-000, at 14 n. 41 (filed Nov. 4, 2013) and SPP Answer, Docket No. ER13-1937-000, at 8. (filed Nov. 4, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 209 (finding it reasonable for a transmission provider to "identify, out of this larger set of needs, those needs for which transmission solutions will be evaluated"); Order No. 1000-A, 139 FERC ¶ 61,132 (2012) at PP 302, 320 ("Order No. 1000 does not require that every potential transmission need proposed by stakeholders must be selected for further evaluation"))).

¹³⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 209.

¹³⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at PP 302, 320.

arguments should have been raised in requests for rehearing and, therefore, are barred in this compliance proceeding.¹³⁷

65. In spite of SPP's and MISO's answers, ATC/Duke continues to object to the unlimited discretion that SPP and MISO propose to give themselves in the Coordinated System Planning process and the lack of formal procedures for evaluating interregional transmission projects proposed by developers. ATC/Duke asserts that the Order No. 1000 requirement to identify and jointly evaluate proposed interregional facilities require the RTOs to develop procedures to ensure that developers have the opportunity to have their projects jointly evaluated. ATC/Duke points to SPP's and MISO's statement that there will be a preliminary screening process for proposed projects, which SPP and MISO suggest may alleviate the need to study every project that is submitted.¹³⁸ ATC/Duke argues that this approach ignores the plain language of Order No. 1000, gives too much discretion to SPP and MISO, does not require that the RTOs jointly evaluate proposed transmission projects, and creates significant uncertainty for transmission developers.¹³⁹ ATC/Duke states that the RTOs' suggested preliminary screening process appears to be new and is not adequately described in the RTOs' compliance filings (e.g., lacking the criteria for evaluating projects).¹⁴⁰ ATC/Duke asks the Commission to require SPP and MISO to work with their stakeholders to develop appropriate procedures for evaluating proposed interregional projects and to require that such procedures be submitted in a compliance filing for Commission approval.¹⁴¹

¹³⁷ MISO Answer, Docket No. ER13-1938-000, at 14 (filed Nov. 4, 2013) and SPP Answer, Docket No. ER13-1937-000, at 8. (filed Nov. 4, 2013).

¹³⁸ ATC/Duke Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 n.11 (filed Nov. 21, 2013) (citing MISO Answer, Docket No. ER13-1938-000, at 13-14 (filed Nov. 4, 2013) and SPP Answer, Docket No. ER13-1937-000, at 8 (filed Nov. 4, 2013)) ("MISO will continue to give due consideration to transmission issues that may be identified by stakeholders and third parties, but it is unnecessary, and not required by Order No. 1000, for SPP and MISO to commit to fully evaluate any and every project that may be submitted without any preliminary screening").

¹³⁹ ATC/Duke Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Nov. 21, 2013).

¹⁴⁰ ATC/Duke Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5 n.15 (filed Nov. 21, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 345).

¹⁴¹ ATC/Duke Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5 (*continued ...*)

(d) **Commission Determination**

66. We find that SPP's and MISO's proposed procedures for joint evaluation of identified interregional transmission facilities partially comply with Order No. 1000. SPP and MISO propose that the Joint Planning Committee, under the advisement of the Interregional Planning Stakeholder Advisory Committee, will identify and evaluate transmission issues and potential solutions through the development of a Coordinated System Plan. Following this study, the Joint Planning Committee will produce a report detailing the transmission issues evaluated, studies performed, solutions considered, and, if applicable, the recommended interregional transmission facilities with the associated interregional cost allocation. The report is provided to the Interregional Planning Stakeholder Advisory Committee for review, comment, and a recommendation on any proposed interregional transmission facility. Thus, we find that SPP's and MISO's proposed procedures to jointly evaluate interregional transmission facilities comply with, and go beyond, this requirement of Order No. 1000.

67. We find that SPP's and MISO's proposals comply with Order No. 1000's requirement that the joint evaluation of interregional transmission facilities occur in the same general timeframe as each transmission planning region's individual consideration of a proposed interregional transmission facility. SPP and MISO state that the proposed process for the joint evaluation of identified interregional transmission facilities will proceed in parallel to the regional transmission planning processes.

68. We find that SPP's and MISO's proposals also comply with Order No. 1000's requirement that public utility transmission providers in neighboring transmission planning regions include a description of the types of transmission studies conducted to evaluate conditions on their neighboring transmission systems for the purposes of determining whether interregional transmission facilities are more efficient or cost-effective than regional transmission facilities. SPP and MISO propose that, at the completion of the Coordinated System Plan study, the Joint Planning Committee produce a draft report documenting the Coordinated System Plan study, including the transmission issues evaluated, studies performed, solutions considered, and, if applicable, the recommended interregional transmission facilities.¹⁴²

69. For several reasons, we find that SPP's and MISO's proposals satisfy Order No. 1000's requirement that each public utility transmission provider develop procedures by which differences in data, models, assumptions, transmission planning horizons, and criteria used to study a proposed interregional transmission project can be identified and

(filed Nov. 21, 2013).

¹⁴² SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.1 (0.0.0).

resolved for purposes of joint evaluation. The proposed provisions of the SPP-MISO JOA provide the steps that SPP and MISO will take to coordinate planning models and modeling assumptions. The proposed provisions indicate that the Joint Planning Committee will identify any differences between SPP's and MISO's respective transmission planning data, models, assumptions, planning horizons, and criteria and review those differences with stakeholders through the Interregional Planning Stakeholder Advisory Committee. The proposal states that any differences shall be resolved by the Joint Planning Committee and the Interregional Planning Stakeholder Advisory Committee as part of the development of a joint and common model for the joint study of transmission issues and potential interregional transmission solutions. We find that these provisions provide the specificity necessary to comply with the requirement of Order No. 1000. As a result, we reject Public Interest Organizations' and Wind Parties' argument that the SPP-MISO JOA proposal fails to ensure effective interregional transmission coordination for purposes of joint evaluation because it lacks certain procedures for identifying and resolving certain differences and certain terms are vague.

70. We find that Public Interest Organizations' recommendation to require either a full Coordinated System Plan or some more specific study whenever an interregional transmission facility is under review in both regional transmission planning processes is unnecessary to meet the requirements of Order No. 1000. Order No. 1000 explains that "submission of the interregional transmission facility 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 the proposed interregional transmission facility."¹⁴³ We find that the annual review of transmission issues provided in the SPP-MISO JOA is sufficient for a stakeholder to present its proposals for consideration. However, we note that Order No. 1000 also stated that the regional transmission planning process should be informed by the evaluation conducted in the interregional transmission coordination process and vice versa.¹⁴⁴ Accordingly, we expect that, if an interregional transmission facility is considered in both regional transmission planning processes, SPP and MISO will analyze the interregional transmission facility in the interregional transmission coordination process.

71. We find ATC/Duke's and Wind Parties' concerns that third parties' interregional transmission proposals may be ignored in the transmission planning process are without merit. We agree with SPP and MISO that the proposed procedures in the SPP-MISO JOA will give due consideration to proposed transmission issues (which include potential

¹⁴³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436.

¹⁴⁴ See Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 439.

interregional transmission solutions) that may be identified by stakeholders and third parties.¹⁴⁵ We note that, if third parties believe that SPP and MISO have unreasonably refused to consider their proposed transmission issues (which include potential interregional transmission solutions), they can raise their concerns through the stakeholder process (e.g., the Interregional Planning Stakeholder Advisory Committee). If the issues cannot be resolved in the stakeholder process, parties may file a complaint with the Commission pursuant to FPA section 206.

72. However, we find that SPP and MISO have not proposed to consider regional reliability needs or transmission needs driven by public policy requirements in both transmission planning regions as part of the joint evaluation of an interregional transmission facility. In Order No. 1000-A, the Commission explained that

[i]n Order No. 1000, the Commission determined that interregional transmission coordination neither requires nor precludes longer-term interregional transmission planning, including consideration of transmission needs driven by Public Policy Requirements.¹⁴⁶ Order No. 1000 stated that whether and how to address this issue with regard to interregional transmission facilities is a matter for public utility transmission providers, through their regional transmission planning processes, to resolve in the development of compliance proposals. We clarify that Order No. 1000 does not require or prohibit consideration of transmission needs driven by Public Policy Requirements as part of interregional transmission coordination. However, such considerations are required through the regional transmission planning process, which is an integral part of interregional transmission coordination because all

¹⁴⁵ See Determination on Data and Information Exchange directing SPP and MISO to include “Transmission Issue” as a defined term in the SPP-MISO JOA that includes issues related to regional transmission needs driven by reliability, economics, and public policy requirements.

¹⁴⁶ Order No. 1000 defined Public Policy Requirements as requirements established by local, state or federal laws or regulations (i.e., enacted statutes passed by the legislature and signed by the executive and regulations promulgated by a relevant jurisdiction, whether within a state or at the federal level). Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 2. Order No. 1000-A clarified that Public Policy Requirements included local laws and regulations passed by a local governmental entity, such as a municipal or county government. Order No. 1000-A, 139 FERC ¶ 61,132 at P 319.

interregional transmission projects must be selected in both of the relevant regional transmission planning processes in order to receive interregional cost allocation. Therefore, consideration of transmission needs driven by Public Policy Requirements is an essential part of the evaluation of an interregional transmission project, not as part of interregional transmission coordination, but rather as part of the relevant regional transmission planning processes. As such, we continue to believe that the decision of whether and how to address these issues with regard to interregional transmission facilities in the regional transmission planning processes is a matter for public utility transmission providers to work out with their stakeholders in the development of compliance proposals.^[147]

73. MISO proposes to consider economic benefits under the joint evaluation procedures by measuring adjusted production cost savings of an interregional transmission project.¹⁴⁸ MISO does not propose to measure benefits associated with reliability needs or transmission needs driven by public policy requirements. Therefore, we find MISO's proposal to consider only economic benefits does not comply with the joint evaluation requirements of Order No. 1000 because it does not provide a way for SPP and MISO in their respective regional transmission process to evaluate proposed interregional transmission facilities that address both transmission planning region's regional reliability needs and transmission needs driven by public policy requirements.

74. SPP proposes to consider economic benefit under the joint evaluation procedures by measuring adjusted production cost savings¹⁴⁹ and consider reliability benefits by measuring a combination of avoided costs¹⁵⁰ and adjusted production cost savings.¹⁵¹ SPP does not propose a benefit metric to measure benefits associated with transmission

¹⁴⁷ Order No. 1000-A, 139 FERC ¶ 61,132 at P 500.

¹⁴⁸ MISO, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0).

¹⁴⁹ SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1.a (0.0.0).

¹⁵⁰ *See Public Service Co. of Colorado*, 142 FERC ¶ 61,206, at P 319 (2013) (finding that the avoided cost approach to identifying the beneficiaries of reliability transmission projects reasonably captures the benefits of such transmission projects).

¹⁵¹ SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1.b (0.0.0).

needs driven by public policy requirements.¹⁵² Therefore, we find SPP's proposal to consider only economic and reliability benefits does not comply with the joint evaluation requirements of Order No. 1000 because it does not provide a way for SPP and MISO in their respective regional transmission processes to evaluate proposed interregional transmission facilities that address both transmission planning region's transmission needs driven by public policy requirements.

75. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of the issuance of this order, further compliance filings that revise their proposed interregional transmission coordination procedures so that an interregional transmission facility that may resolve regional reliability needs (which MISO's proposal lacks) and transmission needs driven by public policy requirements (which both SPP's and MISO's proposals lack) can be considered by each respective regional transmission planning process.

iii. Transparency and Stakeholder Participation

76. 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.¹⁵³ 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.¹⁵⁴

77. 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."¹⁵⁵ The Commission also required that each public utility transmission provider describe in

¹⁵² SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1.c (0.0.0) (stating that the Joint Planning Committee will develop a benefit metric for projects identified as primarily addressing public policy issue).

¹⁵³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 458.

¹⁵⁴ *Id.*

¹⁵⁵ 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).

its OATT how the regional transmission planning process will enable stakeholders to provide meaningful and timely input with respect to the consideration of interregional transmission facilities.¹⁵⁶

(a) **Compliance Filings**

78. SPP and MISO propose that each will maintain webpages on their respective websites dedicated to the communication of information on interregional transmission coordination procedures. SPP and MISO state that, to ensure consistency, they will coordinate the documents and information posted on their respective websites. At a minimum, SPP and MISO propose that each website will include: (1) a link to the SPP-MISO JOA; (2) notice of scheduled Interregional Planning Stakeholder Advisory Committee meetings; (3) links to materials for Interregional Planning Stakeholder Advisory Committee meetings; and (4) documents relating to Coordinated System Plan studies.¹⁵⁷ Additionally, SPP and MISO propose that information shared between the parties as part of the interregional transmission planning process will appropriately protect confidential information and Critical Energy Infrastructure Information (CEII).¹⁵⁸

79. SPP and MISO state that their respective stakeholders will have an opportunity to participate fully in the evaluation of any proposed Interregional Projects through the regional processes of SPP and MISO.¹⁵⁹ In addition, SPP and MISO propose that stakeholders will be represented and able to provide input through the stakeholder-driven Interregional Planning Stakeholder Advisory Committee. SPP and MISO explain that the Interregional Planning Stakeholder Advisory Committee advises the Joint Planning Committee on the identification and evaluation of transmission issues and potential solutions in connection with the determination and development of a Coordinated System Plan. SPP and MISO propose that the Interregional Planning Stakeholder Advisory

¹⁵⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at P 522.

¹⁵⁷ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 12; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 13-14 (citing SPP, SPP-MISO JOA, art. IX, § 9.1.1.4 (0.0.0)).

¹⁵⁸ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 11; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 13 (citing SPP, SPP-MISO JOA, art. IX, § 9.2.1 (0.0.0) and § 9.2.2 (0.0.0)).

¹⁵⁹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 12; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 13-14 (citing MISO, Tariff, Attachment FF, § I.C.2 (14.0.0) and SPP, OATT, Attachment O, § IV.6 (2.0.0)).

Committee shall meet at least annually, during the third quarter of each year, and more frequently when necessary during the development of a Coordinated System Plan. SPP and MISO propose that each of them will define and be represented by its voting group. SPP and MISO add that each voting group will represent one vote and may provide a recommendation to the Joint Planning Committee on behalf of the Interregional Planning Stakeholder Advisory Committee.¹⁶⁰ SPP and MISO propose that the Interregional Planning Stakeholder Advisory Committee can make recommendations to the Joint Planning Committee concerning both the need to study transmission issues and solutions and the appropriate action on any solutions identified in the draft of the Joint Planning Committee's report on the results of a study.¹⁶¹

80. The proposed SPP-MISO JOA provides that, when the Coordinated System Plan study is complete, the Joint Planning Committee will produce a draft report documenting the study, including transmission issues evaluated, studies performed, solutions considered, and transmission projects recommended. SPP and MISO explain that the Coordinated System Plan will be provided to the Interregional Planning Stakeholder Advisory Committee for comments and review.¹⁶² SPP and MISO propose that the Joint Planning Committee will vote on whether to recommend the Interregional Project(s) and the associated cost allocation to each party's regional process for review and approval, taking into consideration the recommendation of the Interregional Planning Stakeholder Advisory Committee. SPP and MISO state that the final Coordinated System Plan will include, among other things, the analyses performed and the results and will be posted to SPP's and MISO's interregional transmission coordination webpages.¹⁶³

(b) Comments and Protests

81. Wind Parties express concerns about the make-up of the SPP members of the Interregional Planning Stakeholder Advisory Committee. They state that, because the SPP members of the Interregional Planning Stakeholder Advisory Committee will be members of the current SPP seams work group plus any transmission owner that is

¹⁶⁰ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 12-13; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 14-15 (citing SPP, SPP-MISO JOA, art. IX, § 9.1.2 (1.0.0)).

¹⁶¹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 13; SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 15 (citing SPP, SPP-MISO JOA, art. IX, § 9.3.2.3 (0.0.0), § 9.3.2.5 (0.0.0), and § 9.3.3.5.1 (0.0.0)).

¹⁶² SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.1 (0.0.0).

¹⁶³ SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.2 (0.0.0).

located on the seam, the proposed structure favors incumbent transmission companies to the detriment of independent power producers, transmission-dependent utilities, and merchant transmission companies. Wind Parties argue that this structural issue is critical because the SPP portion of the Interregional Planning Stakeholder Advisory Committee will have voting rights, which will reflect the position of the SPP portion of the Interregional Planning Stakeholder Advisory Committee. Wind Parties allege that SPP staff members have stated that they will follow the wishes of the SPP portion of the Interregional Planning Stakeholder Advisory Committee group in taking positions on the Joint Planning Committee.¹⁶⁴ Wind Parties state that the membership of the seams working group is intended to be balanced between transmission owners and others.¹⁶⁵ They assert nevertheless that this proposed structure will lessen the value and effect of input from important stakeholder groups and give a veto to the interests of incumbent transmission companies in all aspects of the decisions of the Joint Planning Committee, including the modeling and assessment of interregional transmission solutions. Wind Parties ask the Commission to require SPP to explain this proposed membership structure, why the proposal is not unduly discriminatory, and whether it may in certain cases prevent achieving solutions that result in just and reasonable rates.¹⁶⁶

82. Public Interest Organizations support SPP's and MISO's use of the Interregional Planning Stakeholder Advisory Committee as a forum for stakeholder review and input into coordinated system planning.¹⁶⁷ Public Interest Organizations state that the Interregional Planning Stakeholder Advisory Committee forum will provide an Order No. 1000-compliant opportunity for stakeholder engagement. However, Public Interest Organizations are concerned that not all relevant analyses and determinations will be sufficiently transparent for stakeholder review. They note that the SPP-MISO JOA

¹⁶⁴ Wind Parties state that SPP approved using this group as the official Interregional Planning Stakeholder Advisory Committee membership for SPP, plus any additional SPP transmission members that have assets located on the seam, and SPP staff members have stated on several occasions that they will follow the wishes of this group in taking positions on the Joint Planning Committee. Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 11 (filed Sept. 24, 2013).

¹⁶⁵ *Id.* at 11. (“The [seams work group] is a working group within the SPP which is supposedly ‘balanced’ under SPP’s tariff with members from transmission and non-transmission owning members”).

¹⁶⁶ *Id.* at 11 (filed Sept. 24, 2013).

¹⁶⁷ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 8 (filed Sept. 9, 2013).

commits both SPP and MISO to maintain a website containing specified interregional transmission coordination information, including “documents *related to* Coordinated System Plan studies.”¹⁶⁸ Public Interest Organizations argue that this requirement does not state “all documents” or “all documents subject to confidentiality requirements” or provide a list of the types of documents that will be provided, and, therefore, SPP and MISO have not ensured sufficient transparency. Public Interest Organizations ask the Commission to require SPP and MISO to post *all* of the studies and documents (subject to Commission-accepted confidentiality requirements) related to Interregional Projects that have been jointly identified and that are under review and the rationales for decisions not to pursue joint evaluation of specific Interregional Projects proposed by stakeholders.¹⁶⁹

(c) **Answers**

83. In response to the Public Interest Organizations’ request for the SPP-MISO JOA to explicitly provide for access to “all documents,” SPP and MISO explain that the requirement to provide “documents related to Coordinated System Plan studies” includes all documents that bear a relationship to the performance of such studies, subject to applicable confidentiality requirements. Therefore, SPP and MISO argue that their proposal is compliant with the transparency requirements of Order No. 1000.¹⁷⁰

(d) **Commission Determination**

84. We find that SPP’s and MISO’s proposed revisions to the SPP-MISO JOA concerning transparency and stakeholder participation partially comply with the requirements of Order No. 1000. Specifically, we find that the proposed revisions comply with the requirement to maintain a website or email list for the communication of information related to interregional transmission coordination. Specifically, the proposed SPP-MISO JOA provides that SPP and MISO will each maintain their own webpages dedicated to interregional transmission coordination information between SPP and MISO. Additionally, under the Joint Planning Committee, SPP and MISO will coordinate to ensure the consistency of information, which shall contain at a minimum: (1) a link to

¹⁶⁸ *Id.* (citing SPP, SPP-MISO JOA, art. IX, § 9.1.1.4 (0.0.0) (emphasis added by Public Interest Organizations)).

¹⁶⁹ Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 8-9 (filed Sept. 9, 2013).

¹⁷⁰ MISO Answer, Docket No. ER13-1938-000, at 15 (filed Nov. 4, 2013); SPP Answer, Docket No. ER13-1937-000, at 10 (filed Nov. 4, 2013) (citing SPP, SPP-MISO JOA, art. IX, § 9.1.1.4 (0.0.0)).

the SPP-MISO JOA; (2) notices of Interregional Planning Stakeholder Advisory Committee meetings and materials; and (3) documents related to Coordinated System Plan studies.¹⁷¹ These proposed revisions satisfy Order No. 1000.

85. SPP and MISO propose that information shared between the parties as part of the interregional transmission planning process will appropriately protect confidential information and CEII. We find that these provisions also meet the transparency requirements of Order No. 1000, by allowing transmission providers to communicate information related to the interregional transmission coordination procedures.

86. We agree with SPP and MISO that Public Interest Organizations' request that SPP and MISO add language stating that they must post *all* documents and studies on their websites is unnecessary. SPP and MISO have explained that the requirement to provide "documents related to Coordinated System Plan studies" in the SPP-MISO JOA includes all documents that bear a relationship to the performance of such studies, subject to applicable confidentiality requirements. For this reason, we find the proposed language sufficiently indicates that SPP and MISO are required to post all documents related to the Coordinated System Plan studies. We note that, if in practice all these documents are not posted, stakeholders may file a complaint with the Commission pursuant to FPA section 206 raising this issue.

87. We find that SPP's and MISO's proposed revisions to the SPP-MISO JOA concerning opportunities for stakeholders to participate and provide input into the interregional transmission coordination processes comply with the requirements of Order No. 1000. First, we find that the proposal to create the Interregional Planning Stakeholder Advisory Committee as a venue for stakeholders to be represented and for them to provide input satisfies Order No. 1000. We find that allowing the Interregional Planning Stakeholder Advisory Committee to provide recommendations to the Joint Planning Committee gives stakeholders sufficient opportunity to provide input during the identification of interregional transmission issues and the evaluation of interregional transmission solutions. Additionally, we find that allowing the Interregional Planning Stakeholder Advisory Committee to review and comment on the draft report that documents the Coordinated System Plan study, including the transmission issues evaluated, studies performed, solutions considered, and transmission projects recommended, prior to the Joint Planning Committee voting on the whether to recommend interregional transmission facilities for SPP and MISO to consider in their respective regional transmission planning processes satisfies the stakeholder participation requirements of Order No. 1000.

¹⁷¹ SPP, SPP-MISO JOA, art. IX, § 9.1.1.4 (0.0.0).

88. We agree with Wind Parties that the Interregional Planning Stakeholder Advisory Committee voting process must be clarified. The proposed SPP-MISO JOA states that “[Interregional Planning Stakeholder Advisory Committee] participation is open to all stakeholders,”¹⁷² but the proposed SPP-MISO JOA does not define or otherwise explain the voting process for SPP or MISO. In the absence of such an explanation, we find unclear how that voting process will achieve the goal of enabling all stakeholders to participate fully in the Interregional Planning Stakeholder Advisory Committee, including which stakeholders will be participating in the voting process and how the votes of those that do participate will be considered. Therefore, we agree with Wind Parties that, without transparency into how the voting process is defined, the potential for the voting process to lessen the value of input from particular stakeholder groups exists. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, a compliance filing that revises the SPP-MISO JOA to explain how all stakeholders can participate in the Interregional Planning Stakeholder Advisory Committee, which stakeholders will participate in the Interregional Planning Stakeholder Advisory Committee voting process and how their votes will be considered.

2. Cost Allocation

89. 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.¹⁷³ 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.¹⁷⁴ 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.¹⁷⁵ The Commission clarified that it would not require each transmission planning

¹⁷² SPP, SPP-MISO JOA, art. IX, § 9.1.2.1 (0.0.0).

¹⁷³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 626, 634.

¹⁷⁴ 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.

¹⁷⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733; 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.¹⁷⁶

90. 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.¹⁷⁷ 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.¹⁷⁸

91. 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. 1000.¹⁷⁹ The Commission took a principles-based approach because it recognized that regional differences may warrant distinctions in cost allocation methods among transmission planning regions.¹⁸⁰ The Commission recognized that a variety of methods for cost allocation, including postage stamp cost allocation, may satisfy the set of general principles.¹⁸¹ The Commission stated that the cost allocation principles do not apply to

¹⁷⁶ Order No. 1000-A, 139 FERC ¶ 61,132 at P 627 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 580).

¹⁷⁷ Order No. 1000-A, 139 FERC ¶ 61,132 at PP 628, 635 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436).

¹⁷⁸ Order No. 1000-A, 139 FERC ¶ 61,132 at P 635.

¹⁷⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603; Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

¹⁸⁰ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 604; Order No. 1000-A, 139 FERC ¶ 61,132 at P 638.

¹⁸¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 605; Order No. 1000-A 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.¹⁸² The Commission also explained that Order No. 1000 permits participant funding but not as an interregional cost allocation method.¹⁸³

92. 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.¹⁸⁴ 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. 1000.¹⁸⁵ 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.¹⁸⁶

93. 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

¹⁸² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 603; Order No. 1000-A at P 638.

¹⁸³ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 723-729; Order No. 1000-A at PP 718, 726-737.

¹⁸⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

¹⁸⁵ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578; Order No. 1000-A, 139 FERC ¶ 61,132 at P 626.

¹⁸⁶ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 607; Order No. 1000-B, 141 FERC ¶ 61,044 at P 66.

Requirements.¹⁸⁷ Interregional Cost Allocation Principle 1 precludes an allocation where the benefits received are trivial in relation to the costs to be borne.¹⁸⁸

94. Order No. 1000 does not prescribe a particular definition of “benefits” or “beneficiaries.”¹⁸⁹ 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.”¹⁹⁰ 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.¹⁹¹ 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.¹⁹² 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.¹⁹³ 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.¹⁹⁴ 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

¹⁸⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 622, *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 at PP 654, 681-682, 691.

¹⁸⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 639.

¹⁸⁹ *Id.* P 624; Order No. 1000-A, 139 FERC ¶ 61,132 at PP 655, 674, 676-679.

¹⁹⁰ Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

¹⁹¹ *Id.* P 678.

¹⁹² Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 625.

¹⁹³ Order No. 1000-A, 139 FERC ¶ 61,132 at P 679.

¹⁹⁴ Order No. 1000-A, 139 FERC ¶ 61,132 at 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. 2003.¹⁹⁵

95. 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.¹⁹⁶ All cost allocation methods must provide for allocation of the entire prudently incurred cost of a transmission project to prevent stranded costs.¹⁹⁷ 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.¹⁹⁸

96. 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.¹⁹⁹ 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.²⁰⁰ 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 transmission planning and that likely future scenarios can be an important factor in public

¹⁹⁵ 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.

¹⁹⁶ 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.

¹⁹⁷ 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 on reh’g*, Order No. 1000-B, 141 FERC ¶ 61,044 at P 68.

¹⁹⁸ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 641.

¹⁹⁹ 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.

²⁰⁰ 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.

utility transmission providers' consideration of transmission projects and in the identification of beneficiaries consistent with the cost causation principle.²⁰¹

97. 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.²⁰² 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.²⁰³ 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.²⁰⁴

98. The Commission stated that Interregional Cost Allocation Principle 3 did not require the use of a benefit to cost ratio threshold.²⁰⁵ 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.²⁰⁶ 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.²⁰⁷ 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

²⁰¹ Order No. 1000-B, 141 FERC ¶ 61,044 at P 72.

²⁰² 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.

²⁰³ 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.

²⁰⁴ 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.

²⁰⁵ 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.

²⁰⁶ Order No. 1000-B, 141 FERC ¶ 61,044 at P 64.

²⁰⁷ 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.

higher threshold if they justify it and the Commission approves a greater ratio.²⁰⁸ 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.²⁰⁹

99. 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.²¹⁰ Costs cannot be assigned involuntarily to a transmission planning region in which that interregional transmission facility is not located.²¹¹ 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.²¹² 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.²¹³

100. Interregional Cost Allocation Principle 5 specifies that the cost allocation method and data requirements for determining benefits and identifying beneficiaries for an

²⁰⁸ 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.

²⁰⁹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 650.

²¹⁰ 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.

²¹¹ 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.

²¹² 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.

²¹³ Order No. Order No. 1000-A, 139 FERC ¶ 61,132 at P 629 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 582).

interregional transmission facility must be transparent with adequate documentation to allow a stakeholder to determine how they were applied to a proposed interregional transmission facility.²¹⁴

101. 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.²¹⁵ Each cost allocation method must be set out clearly and explained in detail in the compliance filing.²¹⁶ 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.²¹⁷

a. Interregional Transmission Project Criteria

i. Proposals

102. SPP and MISO state that they have been unable to reach agreement about the criteria they will use to determine whether an Interregional Project will be eligible for interregional cost allocation and therefore each party has proposed a version for the Commission's consideration.²¹⁸ SPP and MISO agree that to be eligible for interregional cost allocation an Interregional Project must have: (i) a minimum total project cost of \$5 million; (ii) be evaluated as part of the Coordinated System Plan and recommended by the Joint Planning Committee; (iii) benefits to SPP and MISO of five percent or greater of the total benefits identified for the combined SPP and MISO region; and (iv) an in-service date within 10 years from the Interregional Project's approval by the respective Board of Directors of SPP and MISO.²¹⁹ However, SPP and MISO disagree on a final

²¹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 668.

²¹⁵ *Id.* P 685.

²¹⁶ *Id.*

²¹⁷ *Id.* P 686; Order No. 1000-A, 139 FERC ¶ 61,132 at P 628. *See also*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 581.

²¹⁸ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 17-19; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 20-21.

²¹⁹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 18-19 (citing MISO, SPP-MISO JOA, art. IX, § 9.6.3.1 (i)-(ii), (iv)-(v) (0.0.0)); SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 20-21 (citing SPP, SPP-*(continued ...)*)

criterion. MISO proposes to require that an Interregional Project be approved as a Market Efficiency Project²²⁰ under MISO's Tariff and as an Interregional Project under the terms of the SPP Tariff.²²¹ In contrast, SPP proposes that an Interregional Project must be "approved by both [p]arties in their respective regional planning process as outlined in their respective [Open Access Transmission Tariffs]."²²²

103. MISO states that it proposes to rely on Market Efficiency Projects as the only category of Interregional Project that is eligible for interregional cost allocation with SPP because Market Efficiency Projects allow for the consideration of reliability, economic and public policy issues.²²³ MISO states that Multi-Value Projects are "not suitable for interregional coordination, planning, and cost allocation with SPP" or with MISO's other neighboring transmission planning regions. MISO states that Multi-Value Projects are required to be evaluated on a portfolio basis to ensure that the benefits are spread broadly across the MISO region consistent with the 100 percent system-wide allocation of costs

MISO JOA, art. IX, § 9.6.3.1(i)-(ii), (iv)-(v) (0.0.0)).

²²⁰ Market Efficiency Projects are defined as:

Network Upgrades: (i) that are proposed by the Transmission Provider, Transmission Owner(s), ITC(s), Market Participant(s), or regulatory authorities; (ii) that are found to be eligible for inclusion in the [MTEP] or are approved pursuant to...the [MISO Transmission Owners Agreement]...; (iii) that have a Project Cost of \$5 million or more; (iv) that involve facilities with voltages of 345 kV or higher; and that may include any lower voltage facilities of 100 kV or above that collectively constitute less than fifty percent (50%) of the combined project cost, and without which the 345 kV or higher facilities could not deliver sufficient benefit to meet the required [1.25] benefit-to-cost ratio threshold...; (v) that are not determined to be Multi Value Projects; and (vi) that are found to have regional benefits under...Attachment FF.

MISO, FERC Electric Tariff, Attachment FF, § II.B.

²²¹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 19 (citing MISO, SPP-MISO JOA, art. IX, § 9.6.3.1 (iii) (0.0.0)).

²²² SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 20 (citing SPP, SPP-MISO JOA, art. IX, § 9.6.3.1(iii) (0.0.0)).

²²³ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 19.

for Multi-Value Projects. MISO argues that, to be approved under MISO's regional cost allocation methods as a Multi-Value Project, an Interregional Project would have to meet this same requirement tied to 100 percent regional cost allocation, which does not align with the current regional cost allocation methods of the SPP planning region.²²⁴ MISO states that, taking into account the requirements for regional approval of Multi-Value Projects and the differences with the cost allocation processes and methods of the SPP planning region, MISO believes that the Market Efficiency Project cost allocation method better aligns with the processes of SPP at this time. MISO adds that it provides a more likely path towards the approval of Interregional Projects to the benefit of customers in both regions, given the current difference in SPP's and MISO's regional cost allocation mechanisms.²²⁵ For example, MISO states that Market Efficiency Projects would make it more feasible for SPP and MISO to resolve any differences between their modeling and other data that could otherwise impede the effective joint evaluation of transmission needs and the benefits of potential Interregional Projects.²²⁶

104. SPP disagrees with MISO's proposal to use Market Efficiency Projects as the only category of transmission facility that is eligible for interregional cost allocation. SPP notes that the MISO Tariff defines a Market Efficiency Project to include upgrades involving facilities with voltages of 345 kV or higher (that may include any lower voltage facilities of 100 kV or above as necessary to facilitate the 345 kV facilities) with a cost-benefit ratio of 1.25. SPP therefore asserts that MISO's proposal is more restrictive than what the MISO Tariff provides because it limits Interregional Projects that are eligible for interregional cost allocation to those approved as Market Efficiency Projects and excludes transmission projects with a voltage primarily less than 345 kV and projects that are primarily needed to resolve reliability issues or provide public policy benefits.²²⁷ SPP argues that its proposed language would be less restrictive than MISO's proposal and would allow an Interregional Project to qualify for interregional cost allocation by providing reliability, economic, public policy benefits, or that are of a lower voltage level than 345 kV.²²⁸

105. SPP argues that MISO's proposal that an Interregional Project must be approved as a MISO Market Efficiency Project does not comply with the "coordination and joint

²²⁴ *Id.* 20.

²²⁵ *Id.*

²²⁶ *Id.*

²²⁷ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 21.

²²⁸ *Id.* 21-22.

evaluation” requirements of Order No. 1000.²²⁹ SPP states that excluding transmission projects that primarily address reliability or public policy issues, and transmission projects that primarily have a voltage below 345 kV, severely limits the possibility of identifying interregional transmission facilities that could address transmission needs more efficiently or cost-effectively than separate regional transmission facilities.²³⁰ SPP further states that, under MISO’s proposal, to qualify for interregional cost allocation, an Interregional Project’s voltage level must primarily be greater than 345 kV, so that at least 51 percent of a transmission facility must be at a voltage level greater than 345 kV. SPP states that, based on SPP’s planning models, approximately 80 percent of the interconnections between SPP and MISO are at a voltage level less than 345 kV. Thus, SPP concludes that many opportunities for more efficient or cost-effective resolution of issues near the SPP-MISO seam will be precluded from being considered by using MISO’s proposed criteria, contrary to the policy goals established in Order No. 1000.²³¹ SPP further states that removing transmission projects less than 345 kV from consideration as potential interregional solutions may bias the cost-effective analysis towards higher-voltage and possibly less economically efficient and cost-effective solutions.²³²

ii. Supporting Parties Comments

106. MISO, MISO Transmission Owners, and Xcel support MISO’s proposal. MISO states that Market Efficiency Projects are the only regionally cost-allocated project category that is appropriate for interregional transmission coordination and cost allocation.²³³ In addition, MISO argues that Multi-Value Projects are also not suitable for interregional cost allocation with SPP because SPP does not have a type of regionally cost-allocated project similar enough to Multi-Value Projects.²³⁴ MISO states, however, that Market Efficiency Projects are suitable for interregional cost allocation with SPP because SPP has a type of regionally cost-allocated project that is similar to Market

²²⁹ *Id.* 22-23 (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at PP 393-396).

²³⁰ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 23.

²³¹ *Id.*

²³² *Id.* 23-24.

²³³ MISO Protest, Docket No. ER13-1937-000, at 6 (filed Sept. 9, 2013).

²³⁴ *Id.*

Efficiency Projects.²³⁵ MISO also states that, while the 345 kV threshold is necessary for interregional/regional cost allocation under Order No. 1000, both the regional and interregional processes can also consider participant-funded options for lower voltage projects that do not meet MISO's Market Efficiency Project criteria. MISO adds that the interregional study will also identify lower voltage options that could be better solutions for identified needs, although such solutions would not involve interregional cost allocation.²³⁶

107. MISO states that the Market Efficiency Project category also accounts for reliability needs and benefits, as exemplified by the fact that a project that satisfies both Market Efficiency Project and Baseline Reliability Project classification criteria will be classified as a Market Efficiency Project.²³⁷ In addition, MISO states that Order No. 1000 does not require consideration of transmission needs driven by public policy requirements in the interregional transmission coordination process. Nonetheless, MISO states that Market Efficiency Projects can also take public policy considerations into account.²³⁸

108. MISO Transmission Owners similarly argue that SPP's proposal would wrongly impose interregional cost allocation on transmission projects that are not eligible for such treatment because they do not satisfy the threshold eligibility requirement for regional cost allocation.²³⁹ MISO Transmission Owners argue that SPP's proposed formulation of the criteria would expand the scope of the SPP-MISO JOA to include projects that primarily address reliability or public policy issues and do not have the agreed-to benefit to cost ratio of 1.25 and that primarily have a voltage below 345 kV.²⁴⁰ MISO Transmission Owners assert that these changes would create conflicts with provisions of the Commission-accepted MISO Tariff and create inconsistencies across MISO seams that would result in inefficiencies and a lack of clarity in procedures.²⁴¹ In addition,

²³⁵ *Id.* 6-7.

²³⁶ *Id.*

²³⁷ *Id.* 7.

²³⁸ *Id.*

²³⁹ MISO Transmission Owners Comments, Docket No. ER13-1938-000, at 5 (filed Sept. 9, 2013).

²⁴⁰ *Id.* 5 (citing SPP, SPP-MISO JOA, art. IX, § 9.6.3.1 (0.0.0)).

²⁴¹ MISO Transmission Owners Comments, Docket No. ER13-1938-000, at 5 (filed Sept. 9, 2013)

MISO Transmission Owners argue that SPP's proposal does not provide any way to meet the clear requirement of Order No. 1000 that transmission projects must be selected in both transmission planning regions' regional plans to be eligible for interregional cost allocation.²⁴² MISO Transmission Owners state that use of Market Efficiency Projects as the basis for interregional cost allocation meets both the requirements of Order No. 1000 and the Commission's six cost allocation principles.²⁴³

109. MISO Transmission Owners further state that SPP's proposal to expand the interregional classification criteria to include public policy transmission projects is not supported by Order No. 1000 or existing tariffs.²⁴⁴ MISO Transmission Owners state that under the MISO Tariff, such transmission projects are considered Multi-Value Projects, which are evaluated on a portfolio basis to ensure that the benefits are spread broadly across the MISO region, consistent with the 100 percent system-wide allocation of costs for Multi-Value Projects. MISO Transmission Owners contend that there is no comparable transmission project cost allocation designation within SPP at this time, and thus the cost allocation proposed by SPP does not align with MISO's Multi-Value Project structure. MISO Transmission Owners request that, if the Commission finds that a broader scope than that proposed by MISO should be included in interregional cost allocation, the Commission consider requiring MISO to develop a tie-line based mechanism for evaluation of cross-border reliability projects.²⁴⁵

110. Xcel states that SPP seeks to set aside the Commission-approved regional transmission planning process that MISO employs.²⁴⁶ Xcel states that, if the Commission

²⁴² *Id.*

²⁴³ *Id.* 6 (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 18-25).

²⁴⁴ MISO Transmission Owners Protest, Docket Nos. ER13-1937-000 and ER13-1939-000, at 5 (filed Sept. 9, 2013).

²⁴⁵ MISO Transmission Owners Comments, Docket No. ER13-1938-000, at 6-7, 9 (filed Sept. 9, 2013) (MISO Transmission Owners request that the Commission require MISO to develop "a tie-line based mechanism for evaluation of cross-border reliability projects" that would "properly align cost responsibility with demonstrated benefits of reliability projects, while avoiding the need for . . . studies every time a utility needs to replace a minor piece of transmission equipment that serves a local reliability function").

²⁴⁶ Xcel Protest, Docket Nos. ER13-1937-000 and ER13-1939-000, at 10 (filed Sept. 9, 2013).

seeks a broader scope than that proposed by MISO, it supports the alternative tie-line based concept put forward by the MISO Transmission Owners.²⁴⁷

111. In its answer, MISO reiterates that Order No. 1000 requires that the interregional transmission coordination and joint evaluation requirements, and potential interregional solutions, be limited to transmission projects that can be approved by each neighboring transmission planning region's regional process and can be included in their respective transmission plans "for purposes of regional cost allocation."²⁴⁸ MISO states that the Commission accepted MISO's proposal to comply with regional cost allocation requirements through Market Efficiency Projects as well as Multi-Value Projects.²⁴⁹ MISO adds that the Market Efficiency Project category is the only regionally cost-allocated project category that currently has a comparable type of project in SPP.²⁵⁰ MISO argues that, because the Commission accepted MISO's proposed use of Market

²⁴⁷ *Id.* 10, n. 17.

²⁴⁸ MISO Answer, Docket No. ER13-1938-000, at 4 (filed Nov. 4, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 436; Order No. 1000-A, 139 FERC ¶ 61,132 at P 509). MISO states that the Commission distinguished between projects merely rolled into a regional transmission plan and those projects included in a regional transmission plan *for purposes of cost allocation*. Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 64 (stating that the "focus[] of this Final Rule [is] on transmission facilities selected in a regional transmission plan for purposes of cost allocation[.]"). MISO Answer, Docket No. ER13-1938-000, at 4 (filed Nov. 4 n.12, 2013).

²⁴⁹ MISO Answer, Docket No. ER13-1938-000, at 5 (filed Nov. 4, 2013) (citing First Regional Compliance Order, 142 FERC ¶ 61,215 at PP 434-445).

²⁵⁰ MISO Answer, Docket No. ER13-1938-000, at 5 (filed Nov. 4, 2013). The SPP Transmission Owners assert that "any project approved in accordance with SPP's regional planning process would be eligible for consideration" as an interregional project. SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6 (filed Sept. 9, 2013) (emphasis in original). MISO states, however, that it appears SPP's regional process also includes the evaluation and approval of facilities below 100 kV, which are not eligible for regional cost allocation under the SPP tariff, and as such would not be eligible for consideration as interregional projects. *See* 2013 SPP Transmission Expansion Plan Report at 14, 40-53 (Appendix A - Complete List of Network Upgrades), which was approved by SPP's Board of Directors on Jan. 29, 2013 (*available at:* <http://www.spp.org/publications/2013STEPReport.pdf>). Therefore, not every project approved by SPP's regional process would be eligible to be considered as a potential interregional project. MISO Answer, Docket No. ER13-1938-000, at 5 n.14 (filed Nov. 4, 2013).

Efficiency Projects (along with Multi-Value Projects) for regional cost allocation compliance, the 345 kV voltage threshold for Market Efficiency Projects also applies to their consideration as potential Interregional Projects.²⁵¹ MISO reiterates that, while the 345 kV threshold is necessary for MISO's regional and interregional cost allocation under Order No. 1000, both the regional and interregional processes can also consider participant-funded options for lower voltage transmission projects that do not meet MISO's Market Efficiency Project criteria. Moreover, MISO states that lower voltage options could be the preferred solutions, although they would not involve regional or interregional cost allocation as Market Efficiency Projects under the MISO Tariff and lower voltage solutions will not be excluded from the scope of the interregional study that will evaluate alternatives to address identified transmission issues.²⁵²

iii. Opposing Parties Comments

112. Multiple commenters argue that MISO's proposal to limit interregional transmission projects to those that qualify as Market Efficiency Projects does not comply with Order No. 1000 because it does not permit consideration of the reliability and/or public policy benefits that may be provided by interregional transmission projects.²⁵³

113. Western Farmers state that Order No. 1000 requires the identification of "transmission facilities that more efficiently or cost-effectively meet the region's reliability, economic and Public Policy Requirements."²⁵⁴ Western Farmers argue that,

²⁵¹ MISO Answer, Docket No. ER13-1938-000, at 6 (filed Nov. 4, 2013).

²⁵² *Id.*

²⁵³ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 5-8 (filed Sept. 9, 2013); Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 11-20 (filed Sept. 24, 2013); East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4-8 (filed September 9, 2013); Indiana Commission Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3-8 (filed Sept. 9, 2013); ITC Companies Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6-9 (filed Aug. 26, 2013); Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3-16 (filed Sept. 9, 2013); Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 11-15 (filed Sept. 9, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4-13 (filed Sept. 9, 2013); Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4-5 (filed Sept. 9, 2013).

²⁵⁴ Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-
(continued ...)

by focusing on only economic benefits, MISO would exclude interregional projects addressing other or additional transmission needs from the regional plan's project selection process.²⁵⁵ Western Farmers disagree with MISO's claims that its Market Efficiency Projects can also address reliability and public policy issues.²⁵⁶ Western Farmers argue that, "rather than bury[ing] the consideration of reliability and public policy requirements in MISO's [Market Efficiency Projects], the interregional process should be transparent in the consideration of benefits related to reliability and public policy requirements" to enable stakeholders to determine the full scope of benefits of an interregional transmission project.²⁵⁷ Arkansas Electric, Wind Parties, East Texas Cooperatives, and Public Interest Organizations similarly state that MISO's use of Market Efficiency Project for interregional transmission projects is inappropriate because the Market Efficiency Project identification process fails to adequately consider benefits.²⁵⁸

114. Wind Parties, East Texas Cooperatives, ITC Companies, Public Interest Organizations, SPP Transmission Owners, and Western Farmers state that MISO's proposal to rely solely on Market Efficiency Projects as the interregional cost allocation method does not comply with Interregional Cost Allocation Principle 1.²⁵⁹ East Texas

000, at 4 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 11).

²⁵⁵ Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 443).

²⁵⁶ Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Sept. 9, 2013) (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 19).

²⁵⁷ Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4-5 (filed Sept. 9, 2013).

²⁵⁸ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 8 (filed Sept. 9, 2013); Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 18 (filed Sept. 24, 2013); East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6 (filed September 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 203); Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 14 (filed Sept. 9, 2013).

²⁵⁹ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, (continued ...)

Cooperatives state that the inclusion of reliability and public policy benefits are specifically permitted by Order No. 1000.²⁶⁰

115. SPP Transmission Owners add that it is not possible to ensure that costs are “roughly commensurate” with benefits without a full evaluation of those benefits. SPP Transmission Owners argue that measuring only economic benefits leads to two undesirable consequences: (1) projects with significant reliability and/or public policy benefits may not qualify for regional planning at all, and (2) the costs for transmission projects approved as interregional projects that have uncalculated public policy or reliability benefits could be unjustly shifted based upon the economic benefit measure i.e., adjusted production cost.²⁶¹

116. In addition, Wind Parties and ITC Companies state that, if there are significant reliability or public policy benefits from a Market Efficiency Project, but the costs of the transmission project are allocated between the regions using only the economically-driven adjusted production cost metric, then the customers that receive those non-economic benefits will be free riders who do not bear the costs of those benefits.²⁶² ITC Companies state that this result is contrary to Interregional Cost Allocation Principle 1’s requirement that costs and benefits be roughly commensurate and the Commission’s

ER13-1939-000, and ER13-1945-000, at 11-13 (filed Sept. 24, 2013); East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6-8 (filed September 9, 2013); ITC Companies Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6-9 (filed Aug. 26, 2013); Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 12-15 (filed Sept. 9, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 14-15 (filed Sept. 9, 2013); Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5-6 (filed Sept. 9, 2013).

²⁶⁰ East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 7 (filed September 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 622).

²⁶¹ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 15 (filed Sept. 9, 2013); *see also* SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at Ex. SPP-4, 20:1-13 (Prepared Direct Testimony of David Kelley).

²⁶² ITC Companies Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 9 (filed Aug. 26, 2013); Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 11-12 (filed Sept. 24, 2013).

holding that interregional cost allocation proposals ought to address “the potential opportunity for free ridership inherent in transmission services.”²⁶³ Finally, Wind Parties argue that failure to include reliability and public policy benefits in the analysis means that the benefits of some potential interregional transmission projects will be ignored, contrary to Order No. 1000 and recent court decisions.²⁶⁴

117. With regard to the 345 kV limitations of Market Efficiency Projects, Arkansas Electric, Wind Parties, East Texas Cooperatives, Public Interest Organizations, and SPP Transmission Owners contend that MISO’s proposal to limit interregional transmission projects to those that are above 345 kV will result in cost-effective transmission projects being inappropriately excluded from the interregional planning process.²⁶⁵ East Texas Cooperatives state that approximately 80 percent of the interconnections between SPP and MISO are at a voltage level less than 345 kV.²⁶⁶ SPP Transmission Owners agree with SPP that lower voltage facilities that can be built at a lower cost may be more cost-effective and therefore should qualify for consideration in the interregional transmission planning process.²⁶⁷ Some Organization of MISO States members also recommend

²⁶³ ITC Companies Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 9 (filed Aug. 26, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 10).

²⁶⁴ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 13 (filed Sept. 24, 2013) (citing *Illinois Commerce Comm’n v. FERC*, 721 F.3d 764 (7th Cir. 2013)).

²⁶⁵ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 7-8 (filed Sept. 9, 2013); Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 18 (filed Sept. 24, 2013); East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5 (filed September 9, 2013); Public Interest Organizations Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 12 (filed Sept. 9, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 9 (filed Sept. 9, 2013) (citing SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 23).

²⁶⁶ East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6 (filed September 9, 2013) (citing SPP Interregional Compliance Filing, Docket No. ER13-1937-000, EXH. SPP-4 (Prepared Direct Testimony of David Kelley at 11 (July 10, 2013))).

²⁶⁷ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 9 (filed Sept. 9, 2013) (citing SPP Interregional Compliance Filing, Docket No. ER13-1937-000, at 24-25).

rejecting the portion of MISO's proposal that makes projects below 345 kV ineligible for consideration as interregional projects.²⁶⁸

118. Wind Parties and SPP Transmission Owners reject MISO's assertion that Multi-Value Projects are not an appropriate transmission project type (and associated cost allocation method) for interregional transmission projects.²⁶⁹ Wind Parties and SPP Transmission Owners argue that Multi-Value Projects are the only type of MISO project with a cost allocation method that considers reliability, economic, and public policy benefits.²⁷⁰ Wind Parties ask the Commission to reject MISO's argument that it cannot consider a Multi-Value Project as an interregional transmission project because Multi-Value Projects must be considered in a portfolio of multiple projects.²⁷¹ SPP Transmission Owners add that MISO approved one Multi-Value Project, the Michigan Thumb project, a year before it was evaluated with the rest of its portfolio.²⁷² Thus, SPP Transmission Owners contend that the requirement to consider Multi-Value Projects as

²⁶⁸ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 12-13 (filed Sept. 9, 2013).

²⁶⁹ MISO states that Multi-Value Projects are projects that spread benefits "broadly across the MISO footprint," based on benefit criteria including (1) the ability to enable "the reliable and economic delivery of energy in support of documented energy policy mandates or laws that have been enacted or adopted through state or federal legislation;" (2) the provision of multiple types of economic value across multiple pricing zones; and (3) the ability to address multiple transmission Issues associated with reliability and economic issues affecting multiple pricing zones. *See* MISO Interregional Compliance Filing, Docket No. ER13-1938-000, Tab F, Testimony of Jennifer Curran (Curran Testimony) at 5-6. MISO asserts that because 100 percent of the costs of Multi-Value Projects are allocated across the region, the Multi-Value Project category "does not align with the current regional cost allocation methods of the SPP planning region" (Curran Testimony at 7).

²⁷⁰ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 14-15 (filed Sept. 24, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 10-13 (filed Sept. 9, 2013).

²⁷¹ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 15 (filed Sept. 24, 2013).

²⁷² SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 11 (filed Sept. 9, 2013).

part of a portfolio of similar projects does not preclude considering the project as an interregional project.²⁷³

119. SPP Transmission Owners also disagree with MISO that, given the different regional cost allocation mechanisms employed by SPP and MISO, the Market Efficiency Project cost allocation method better aligns with SPP's processes.²⁷⁴ SPP Transmission Owners assert that Order No. 1000 does not mandate that the *interregional* cost allocation method match up with each RTO's *regional* cost allocation method.²⁷⁵ SPP Transmission Owners argue that interregional cost allocation is just the first cut at the pie because it determines what overall percentage of project cost SPP and MISO pay.²⁷⁶ SPP Transmission Owners state that the way SPP and MISO allocate those costs within their own regions is up to them.

120. Wind Parties, East Texas Cooperatives, ITC Companies, SPP Transmission Owners, and Western Farmers urge the Commission to accept SPP's proposal because it includes consideration of economic, reliability, and public policy requirement benefits.²⁷⁷ In the alternative, Wind Parties state that, if the Commission is not willing to accept SPP's proposal, it should provide guidance to SPP and MISO and hold a technical

²⁷³ *Id.*

²⁷⁴ *Id.* 12 (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 20).

²⁷⁵ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 12 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 578).

²⁷⁶ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 12-13 (filed Sept. 9, 2013).

²⁷⁷ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 19-20, 23 (filed Sept. 24, 2013); East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6, 10 (filed September 9, 2013); ITC Companies Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 8 (filed Aug. 26, 2013); SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4, 15 (filed Sept. 9, 2013); and Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Sept. 9, 2013).

conference or settlement process so that SPP and MISO can agree upon a single interregional cost allocation proposal.²⁷⁸

121. Organization of MISO States and Indiana Commission provide alternatives for the Commission to resolve the conflict between SPP's and MISO's proposals.²⁷⁹ Organization of MISO States asserts that, in the MISO Order No. 1000 Regional Rehearing and Compliance Order, the Commission approved MISO's proposal to eliminate regional cost sharing for Baseline Reliability Projects.²⁸⁰ Organization of MISO States contend that this approval creates a difficulty with regard to cost allocation because one of the requirements for interregional cost allocation for an Interregional Project is that the transmission project must also be selected in a regional transmission plan for purposes of cost allocation.²⁸¹ Thus, Organization of MISO States argues that the fact that a Baseline Reliability Project, which can no longer be selected in a regional transmission plan for purposes of cost allocation, cannot be an Interregional Project has led to the elimination of certain Interregional Projects. Organization of MISO States contends that this outcome is contrary to Order No. 1000's goal of encouraging such projects when they are more efficient or cost-effective than regional Baseline Reliability Projects.²⁸²

²⁷⁸ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 24-25 (filed Sept. 24, 2013).

²⁷⁹ Indiana Commission Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6-8 (filed Sept. 9, 2013); Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5-16 (filed Sept. 9, 2013).

²⁸⁰ While previously the costs of Baseline Reliability Projects were shared depending on multiple factors, the Commission accepted MISO's proposal to eliminate cost sharing between transmission pricing zones and allocate all Baseline Reliability Project costs to the pricing zone where the Baseline Reliability Project is located. MISO First Regional Compliance Order., 142 FERC ¶ 61,215.

²⁸¹ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4, 4 n.7 (filed Sept. 9, 2013) (citing Order No. 1000-A, 139 FERC ¶ 61,132 at PP 394, 423, 500, 506 and 628).

²⁸² Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 4 (filed Sept. 9, 2013) ("Due to the March 22 Order . . . MISO has had to propose along all of its seams either the elimination of cross-border [Baseline Reliability Projects] and interregional cost allocation for cross-border [Baseline Reliability Projects], or to have no cross-border [Baseline Reliability Projects] and no interregional cost allocation for cross-border [Baseline Reliability Projects]").

122. Organization of MISO States' members have proposed two options to address this conflict. Under Option 1, some Organization of MISO States' members recommend accepting MISO's proposal, allowing only Market Efficiency Projects to qualify as Interregional Projects, and modifying the SPP-MISO JOA to incorporate the voluntary negotiated approach for interregional reliability transmission projects proposed by MISO in its MISO-PJM interregional Order No. 1000 filing with PJM.²⁸³ Organization of MISO States contend that the negotiated voluntary approach MISO proposed for its seam with PJM is workable on the SPP-MISO seam.²⁸⁴

123. Under Option 2, other Organization of MISO States' members favor the Commission's requiring MISO to create an interregional reliability project category with an interregional cost allocation between SPP and MISO.²⁸⁵ Organization of MISO States argues that, while the Commission allowed for different cost allocation methods between RTOs and for different types of transmission facilities, the Commission stated that each cost allocation method must be determined in advance for each type of transmission facility.²⁸⁶ The Organization of MISO States' members supporting Option 2 agree that there are significant benefits to a predetermined interregional cost allocation method for cross-border reliability projects, as well as an open and transparent stakeholder process for determining the cost allocation method. Organization of MISO States asks the

²⁸³ *Id.* 8-16. Organization of MISO States members favoring Option 1 are: Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Minnesota Public Utilities Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, and Texas Public Utility Commission. *Id.* 6 n.8.

²⁸⁴ *Id.* 6-7. As an example of how the MISO-PJM proposal would work for the SPP-MISO seam, Organization of MISO States states that where a MISO transmission owner and an SPP transmission owner each have a pending regional reliability project, through the joint planning process, SPP and MISO would identify an alternative interregional project that is more efficient and cost effective than the individual projects. Organization of MISO States states that the transmission owners would negotiate a cost allocation based on benefits.

²⁸⁵ *Id.* 8. Organization of MISO States members favoring Option 2 are: Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Michigan Public Service Commission, Missouri Public Service Commission, and Wisconsin Public Service Commission. *Id.* 8 n.9.

²⁸⁶ *Id.* 9(citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 581).

Commission to consider section 9.3 of the proposed SPP-MISO JOA—Coordinated System Planning, which states that

The primary purpose of coordinated system planning is to ensure that coordinated analyses are performed to identify expansions or enhancements to transmission system capability *needed to maintain reliability*, improve operational performance, or enhance the efficiency of electricity markets. *Any such expansions or enhancements shall be described in a Coordinated System Plan.*²⁸⁷

124. Organization of MISO States argues that, if the Commission accepts MISO’s proposal to restrict interregional transmission projects to just Market Efficiency Projects, it may be less likely that the above underlined portions of the Coordinated System Plan’s primary purpose will be carried out.²⁸⁸ Organization of MISO States is concerned that there are potential transmission projects identified as “needed to maintain reliability” at or near the SPP-MISO seam that do not meet MISO’s definition of a Market Efficiency Project.²⁸⁹

125. If the Commission accepts MISO’s proposal that only MISO Market Efficiency Projects can qualify as interregional reliability projects, Organization of MISO States’ members supporting Option 2 propose that the Commission require MISO to work with their stakeholders, the Organization of MISO States, and SPP to develop a predetermined method for cost allocation between the two RTOs. These Organization of MISO States’ members also ask the Commission to direct MISO to work with its stakeholders and the Organization of MISO States to develop a predetermined method for cost allocation for the costs allocated to MISO for interregional reliability projects.²⁹⁰ Regarding the interregional cost allocation method, Organization of MISO States point out that one recommended solution would be to develop a distribution factor analysis method (“DFAX”) similar to the one in section 9.4.3.2.1 of the MISO-PJM JOA for identifying each RTO’s cost responsibility. Organization of MISO States argues that the violation-

²⁸⁷ *Id.* 10 (citing SPP, SPP-MISO JOA, art. IX, § 9.3 (1.0.0) (emphasis added by Organization of MISO States)).

²⁸⁸ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 10-11 (filed Sept. 9, 2013).

²⁸⁹ *Id.* 12 (citing MISO, Tariff, Attachment FF, § III.A.2.h (14.0.0)).

²⁹⁰ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 14 (filed Sept. 9, 2013).

based DFAX metric is a well-established metric for identifying the primary beneficiaries (cost causers) of transmission upgrades needed to address reliability standard violations. In general, the violation-based DFAX method measures the contributions to flows on the congested facility, which needs the network upgrade, in order to avoid the reliability standard violation. In this instance, Organization of MISO States contend that the DFAX method would be appropriate because reliability projects are planned and designed to address specifically-identified reliability violations and contributors to those reliability violations can be characterized as cost-causers.²⁹¹

126. Indiana Commission states that the Commission should recognize that interregional transmission projects should still be transmission projects that have been selected in the MISO regional transmission plan, but they do not have to be selected for purposes of cost allocation and that, under this solution, interregional reliability projects could be approved as MISO Baseline Reliability Projects.²⁹² Alternatively, Indiana Commission recommends that (1) the Commission require MISO to develop an interregional reliability project category with its own cost allocation method²⁹³ or (2) the Commission develop, based on the record, an interregional cost allocation method for interregional reliability projects between SPP and MISO.²⁹⁴

127. In its answer, SPP states that it disagrees with MISO and MISO Transmission Owners that Multi-Value Projects are not comparable to the transmission project designation within SPP's regional cost allocation method. SPP states that its Highway/Byway cost allocation method for transmission projects is similar to MISO's Multi-Value Projects because all transmission projects over 100 kV are regionally funded: transmission projects over 300 kV are 100 percent regionally funded, and transmission projects between 100 and 300 kV are 33 percent regionally funded.²⁹⁵ SPP states that the Commission has not required regional cost allocation comparability within each respective planning region.²⁹⁶ In addition, SPP disagrees with the MISO Transmission Owners' assertion that the interregional transmission coordination and cost

²⁹¹ *Id.*

²⁹² Indiana Commission Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 7 (filed Sept. 9, 2013).

²⁹³ *Id.* 6-7.

²⁹⁴ *Id.* 7.

²⁹⁵ SPP Answer, Docket No. ER13-1937-000, at 4 (filed Sept. 24, 2013).

²⁹⁶ *Id.*

allocation requirements of Order No. 1000 mandate an interconnection-wide interregional cost allocation.²⁹⁷

128. SPP also states that the Organization of MISO States' proposal, as part of Option 1, that the Commission require a tie-line approach²⁹⁸ is inconsistent with the cost allocation principles of Order No. 1000, because it would "take[] interregional coordination between the regions and redirect[] it to a local transmission owner level" and "shift[] interregional coordination to the local level," which would result in the development of tie-line facilities that would likely not be eligible for regional cost allocation.²⁹⁹ SPP states that the proposal has no mechanism to ensure that costs are allocated roughly commensurate with benefits, or that the other cost allocation principles are addressed,³⁰⁰ and to the extent the Commission considers the options proposed by Organization of MISO States, SPP supports Option 2 (i.e., the creation of a reliability-based interregional project type).

iv. Commission Determination

129. We accept the four criteria SPP and MISO jointly propose for an interregional transmission facility to be eligible for interregional cost allocation. Specifically, we accept the proposal that, to be eligible for interregional cost allocation, an interregional transmission facility must have: (i) a minimum total transmission project cost of \$5 million; (ii) be evaluated as part of the Coordinated System Plan and recommended by the Joint Planning Committee; (iii) benefits to SPP and MISO of five percent or greater of the total benefits identified for the combined SPP and MISO region; and (iv) an in-service date within 10 years from the interregional transmission facility's approval by the respective Board of Directors of SPP and MISO.³⁰¹

130. As for the last criterion for which SPP and MISO cannot agree, we accept SPP's proposal and require MISO to revise the MISO Tariff to include SPP's proposed language, as discussed below. Specifically, we accept SPP's proposal that, to be eligible

²⁹⁷ *Id.* 5.

²⁹⁸ See MISO Transmission Owners Comments, Docket No. ER13-1938-000, at 6-7 (filed Sept. 9, 2013).

²⁹⁹ SPP Answer, Docket No. ER13-1937-000, at 7-8 (filed Sept. 24, 2013).

³⁰⁰ *Id.* 8.

³⁰¹ MISO, SPP-MISO JOA, art. IX, § 9.6.3.1 (i)-(ii), (iv)-(v) (0.0.0); SPP, SPP-MISO JOA, art. IX, § 9.6.3.1(i)-(ii), (iv)-(v) (0.0.0).

for interregional cost allocation, an interregional transmission facility must be “approved by both [p]arties in their respective regional planning process as outlined in their respective [Open Access Transmission Tariffs].”³⁰² We agree with commenters that MISO’s proposal to limit an interregional transmission facility that is eligible for interregional cost allocation to those that qualify as a Market Efficiency Project under the MISO Tariff does not comply with Order No. 1000 because MISO’s regional cost allocation method for Market Efficiency Projects accounts for mainly regional economic benefits, but does not account for regional reliability benefits or benefits associated transmission needs driven by public policy requirements.³⁰³ We therefore agree with commenters that MISO’s proposal to only consider Market Efficiency Projects fails to sufficiently consider all of the benefits that may accrue from an interregional transmission facility.³⁰⁴

131. In addition, Order No. 1000 requires that, to be eligible for interregional cost allocation, an interregional transmission facility must be selected in the regional transmission plan for purposes of cost allocation. The Commission accepted MISO’s Market Efficiency Project and Multi-Value Project regional cost allocation methods as Order No. 1000-compliant. Market Efficiency Projects account for regional economic benefits and Multi-Value Projects consider three categories of regional benefits: (1) a combination of the benefits associated with the satisfaction of public policy mandates and reliability and economic benefits; (2) multiple economic benefits; and (3) a combination of economic and reliability benefits.³⁰⁵ The Commission similarly accepted SPP’s two regional cost allocation methods as Order No. 1000-compliant: (1) the Highway/Byway regional cost allocation method and (2) the Balanced Portfolio regional cost allocation method.³⁰⁶ We find that SPP’s proposal allows SPP and MISO to jointly identify and evaluate interregional transmission facilities that account for regional transmission needs driven by reliability, economics, and public policy requirements consistent with each region’s regional transmission planning processes. Under SPP’s proposal, MISO’s Market Efficiency Projects and Multi-Value Projects and SPP’s Highway/Byway and

³⁰² See SPP, SPP-MISO JOA, art. IX, § 9.6.3.1(iii) (0.0.0).

³⁰³ MISO First Regional Compliance Order, 142 FERC ¶ 61,215 at P 519.

³⁰⁴ As discussed in the next section of this order, MISO’s proposal to only consider Market Efficiency Projects also does not comply with Interregional Cost Allocation Principle 6.

³⁰⁵ See *Midwest Indep. Transmission Sys. Operator, Inc.*, 142 FERC ¶ 61,215 (2013) at P 519.

³⁰⁶ See *Southwest Power Pool, Inc.*, 144 FERC ¶ 61,059 (2013) at P 347.

Balanced Portfolio transmission projects can be evaluated to determine whether an interregional transmission facility is more efficient or cost-effective than the individually identified regional transmission solution. We also find that SPP's proposal sufficiently includes all benefits that may accrue from an interregional transmission facility.

132. We disagree with MISO's claim that it cannot rely on its regional Multi-Value Project cost allocation method for its allocated portion of an interregional transmission facility because SPP does not have a comparable regional transmission cost allocation method that, like Multi-Value Projects, is evaluated on a portfolio basis. Order No. 1000 did not require that a pair of neighboring transmission planning regions share a common regional cost allocation method(s). Instead, the Commission stated in Order No. 1000 that the "cost allocation method or methods used by the pair of neighboring transmission regions can differ from the cost allocation method or methods used by each region to allocate the cost of a new interregional transmission facility within that region."³⁰⁷ Under SPP's proposal, the interregional cost allocation method determines the percentage of an interregional transmission facility's cost assigned to the SPP and MISO regions. After the interregional cost allocation is determined, the methods SPP and MISO then use to evaluate whether to select the interregional transmission facility in their respective regional transmission plans for purposes of cost allocation do not need to be the same. We note that MISO has not explained why it cannot evaluate an interregional transmission facility through its existing regional transmission planning process for Multi-Value Projects just as it would evaluate a regional transmission facility. For example, MISO could include an interregional transmission facility that results from the interregional process in the MISO-SPP JOA in the portfolio of other potential Multi-Value Projects to evaluate whether MISO should select the interregional transmission facility as a more efficient or cost-effective solution to regional transmission needs. As SPP Transmission Owners note, MISO has previously followed a similar process by first evaluating a regional transmission facility on its own and then including it in the Multi-Value Project portfolio.³⁰⁸ Accordingly, we direct MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to revise section 9.6.3.1(iii) (Criteria for Project Designation as an Interregional Project) to state that an Interregional Project must be "approved by both Parties in their respective regional transmission planning processes as outlined in their respective tariffs."³⁰⁹ Because we accept SPP's proposed criterion, it is not necessary for us to evaluate Organization of MISO States' and Indiana Commission's alternative proposals.

³⁰⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323, at P 578.

³⁰⁸ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 11 (filed Sept. 9, 2013).

133. Although we reject MISO's proposal to limit an interregional transmission facility that is eligible for interregional cost allocation to those that qualify as a Market Efficiency Project, we find that it does not eliminate the concerns commenters raise about an interregional transmission facility that does not meet other minimum threshold requirements but could still provide benefits for both regions. Because Order No. 1000 requires that an interregional transmission facility must be selected in the regional transmission plan for purposes of cost allocation once the transmission facility has been identified as a more efficient or cost-effective interregional transmission facility than the identified regional solution, the criteria and minimum thresholds of the regional cost allocation method(s) still apply. However, consistent with the requirement that public utility transmission providers make transparent the analyses undertaken and determinations reached by neighboring transmission regions in the identification and evaluation of interregional transmission facilities,³¹⁰ SPP and MISO 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 SPP and MISO regions. In addition, as part of the information that public utility transmission providers must communicate on their website related to interregional transmission coordination procedures,³¹¹ SPP and MISO 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.

b. Cost Allocation Method

i. Proposals

134. SPP and MISO state that they have been unable to reach agreement as to the interregional cost allocation method and therefore each party has proposed a version for the Commission's consideration.³¹² MISO proposes to use adjusted production cost as the sole benefit metric to evaluate an Interregional Project.³¹³ SPP proposes using

³¹⁰ 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).

³¹¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 458.

³¹² MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 17, 20-21; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 25-27.

³¹³ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 17, 20-21 (citing MISO, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0)).

adjusted production cost as the metric for economic projects, a combination of avoided cost and adjusted production cost for reliability projects, and another undetermined metric for public policy projects.³¹⁴

135. SPP asserts that, although adjusted production cost is an appropriate measure of the distribution of benefits between regions for projects addressing economic issues, adjusted production cost is not a valid or appropriate indicator of the distribution of benefits provided by reliability and public policy projects. According to SPP, adjusted production cost only measures the generation and congestion cost to serve load and does not account for the quantifiable benefits of meeting public policy requirements or addressing reliability issues.³¹⁵ SPP additionally notes that, when the parties are determining how to allocate the costs of an Interregional Project identified in a Coordinated System Plan under the current SPP-MISO JOA, they can consider the nature of the constraint being resolved (i.e., whether it will resolve thermal or reactive system constraints related to reliability criteria).³¹⁶ SPP argues that, on the other hand, MISO's proposed revisions for interregional cost allocation disregard the nature of the constraint and force the use of a benefit metric that is irrelevant for measuring the benefits associated with resolving a reliability constraint. SPP further asserts that, while transmission solutions needed to meet public policy requirements are not always economical, public policy requirements must be met regardless of the economics of the transmission solution. SPP argues that, therefore, the public policy benefits must be quantified in order to identify the most efficient and cost-effective solution. SPP states that the adjusted production cost metric does not quantify the benefits of meeting public policy requirements.³¹⁷

136. Regarding Interregional Cost Allocation Principle 1, MISO states that its proposal to use Market Efficiency Projects and adjusted production cost savings allocates the costs to beneficiaries in SPP and MISO in a manner at least roughly commensurate with estimated benefits.³¹⁸ MISO adds that its proposal allocates the costs in proportion to the net present value of the total benefits calculated for SPP and MISO.³¹⁹ SPP states that its

³¹⁴ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 25-26 (citing SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1(a)-(c) (0.0.0)).

³¹⁵ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 27.

³¹⁶ *Id.* 28, 28 n.154 (citing Exhibit SPP-4 at 16).

³¹⁷ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 28.

³¹⁸ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 18, 20.

³¹⁹ *Id.* 20.

proposal's use of adjusted production cost as the metric for economic projects, a combination of avoided cost and adjusted production cost for reliability projects, and another metric yet to be determined for public policy projects complies with Order No. 1000 because adjusted production cost alone does not capture the benefits of reliability and public policy projects. SPP argues that its proposal more accurately distributes the benefits of reliability, economic and public policy projects.³²⁰

137. Regarding Interregional Cost Allocation Principle 2, SPP and MISO state that Interregional Project costs cannot be allocated to either SPP or MISO without being selected in both regions' transmission planning processes.³²¹ SPP and MISO state that the allocation of the cost of any Interregional Project located in that party's region to the appropriate SPP-MISO JOA party is based on the voluntary agreement of both SPP and MISO and the outcome of benefit determination processes, under the SPP-MISO JOA.³²²

138. Regarding Interregional Cost Allocation Principle 3, MISO states that, while it does not propose an explicit benefit to cost ratio for Interregional Projects within the SPP-MISO JOA, MISO proposes to comply by evaluating and classifying Interregional Projects as Market Efficiency Projects, which are subject to a cost-benefit threshold of 1.25.³²³ MISO notes that the Commission recently found that the Market Efficiency Project "fixed benefit-cost ratio of 1.25 is just and reasonable because it balances the economic uncertainty of transmission projects with the prospect of approving and constructing projects that provide benefits."³²⁴ MISO states that the same is true of the application of the 1.25 benefit to cost ratio to Market Efficiency Projects that are

³²⁰ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 29-30.

³²¹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 21-22; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 32-33.

³²² MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 21-22; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 32-33.

³²³ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 23.

³²⁴ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 23 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 139 FERC ¶ 61,261, at P 32 (2012)).

Interregional Projects.³²⁵ SPP states that its proposed SPP-MISO JOA complies because it does not have an explicit benefit to cost ratio for Interregional Projects.³²⁶

139. Regarding Interregional Cost Allocation Principle 4, SPP states it has proposed language requiring that, as a part of the evaluation of an Interregional Project, “the [p]arties will determine whether the proposed Interregional Project has potential adverse impacts on the systems of other transmission planning regions.”³²⁷ SPP states that, as a result of this proposed language, any identified adverse impacts will be coordinated with the other potentially affected transmission planning region. SPP states that MISO has not included this section in its proposed version of the SPP-MISO JOA or provided alternative language.³²⁸ SPP further states that SPP and MISO have not agreed to bear costs associated with upgrades to mitigate potential adverse impacts and, therefore, there is no need for SPP and MISO to include provisions for allocating the costs of such upgrades among the beneficiaries in the transmission planning regions in which the transmission facility is located.³²⁹

140. Regarding Interregional Cost Allocation Principle 5, SPP and MISO state that the proposed SPP-MISO JOA specifies the data requirements, benefit and beneficiary determination, and cost allocation methods applicable to Interregional Projects.³³⁰ In addition, SPP and MISO state that stakeholders will be able to review and elicit the documentation and details of the benefit determination and cost allocation of each proposed Interregional Project from proposal through approval or disapproval.³³¹ SPP and MISO add that approved Interregional Projects and the associated information and

³²⁵ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 23.

³²⁶ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 34.

³²⁷ *Id.* 30, 34 (citing SPP, SPP-MISO JOA, art. IX, § 9.3.3.4.1 (0.0.0)).

³²⁸ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 30, 34.

³²⁹ *Id.* 31, 34-35.

³³⁰ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 24; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 35.

³³¹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 25; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 35.

documentation will be publicly posted on the interregional planning webpages on SPP's and MISO's respective websites.³³²

141. Regarding Interregional Cost Allocation Principle 6, MISO states that Order No. 1000 allows, but does not require, different cost allocation methods for different types of Interregional Projects. MISO states that its proposal to use Market Efficiency Projects and adjusted production cost will account for reliability, economic and public policy project types.³³³ SPP states that its proposal accounts for reliability, economic, and public policy projects.³³⁴

ii. Comments and Protests

142. With respect to Interregional Cost Allocation Principle 4, SPP notes that it has proposed section 9.3.3.4.1 (Evaluating Potential Impact of Proposed Interregional Projects to Other Transmission Planning Regions) regarding the determination of potential adverse impacts on systems of other transmission planning regions. SPP argues that, because MISO failed to include such a provision, MISO's compliance filing is deficient.³³⁵ East Texas Cooperatives and Western Farmers agree that SPP's proposed Section 9.3.3.4.1 complies with Principle 4 and challenge MISO's refusal to include this provision.³³⁶ SPP Transmission Owners also urge the Commission to approve SPP's proposed provision as complying with Principle 4.³³⁷

143. In response, MISO states that the difference in proposals exists because SPP focuses on "adverse" impacts, while MISO focuses on reliability impacts.³³⁸ MISO

³³² MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 25; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 35-36.

³³³ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 25.

³³⁴ SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 36.

³³⁵ SPP Comments, Docket No. ER13-1938-000, at 2 (filed Sept. 9, 2013).

³³⁶ East Texas Cooperatives Protest, Docket Nos. ER13-1937-000 and ER13-1938-000, at 8 (filed September 9, 2013); Western Farmers Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 6 (filed Sept. 9, 2013).

³³⁷ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 16 (filed Sept. 9, 2013)

³³⁸ MISO states that it proposed that as part of the evaluation of any Market Efficiency Project or Multi-Value Project, it would "determine whether the proposed (*continued ...*)

argues that, when Market Efficiency Projects that are proposed as Interregional Projects are evaluated in MISO's regional process, their potential reliability impacts on other transmission planning regions will also be addressed during the regional evaluation. MISO states that its regional process sufficiently meets the requirement to consider the potential impact of Interregional Projects on other transmission planning regions. However, MISO states that, if the Commission requires, MISO would be willing to include such a provision in the SPP-MISO JOA, focused on reliability-related impacts.³³⁹

144. With respect to Interregional Cost Allocation Principle 5, Wind Parties claim that SPP does not comply. Wind Parties argue that, while SPP has indicated that it will develop a benefit metric for transmission projects identified as primarily addressing public policy issues, the specifics of how this benefit metric will be included in the interregional cost allocation method must be sufficiently detailed to comply with Interregional Cost Allocation Principle 5.³⁴⁰

145. With respect to Interregional Cost Allocation Principle 6, Arkansas Electric and Wind Parties argue that MISO's proposed cost allocation method does not comply with the requirement that different cost allocation methods may be used for different types of interregional transmission facilities.³⁴¹ Wind Parties state that MISO must either propose multiple types of projects that can each consider different benefits or provide for a more robust benefit evaluation in a single interregional transmission project type.³⁴² Wind Parties state that interregional transmission projects are likely to bring a combination of benefits, including reliability, economic, and public policy benefits, and that SPP and

[Market Efficiency Project or Multi-Value Project] causes any violations of NERC reliability standards on the transmission system(s) of the adjacent neighboring transmission planning region(s)." MISO Protest, Docket No. ER13-1937-000, at 9 (filed Sept. 9, 2013).

³³⁹ *Id.* 9-10.

³⁴⁰ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 19-20 (filed Sept. 24, 2013).

³⁴¹ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 6-7 (filed Sept. 9, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 685); Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 16 (filed Sept. 24, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 685).

³⁴² Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 16 (filed Sept. 24, 2013).

MISO have agreed to consider economic, reliability and public policy projects in their interregional filing.³⁴³ Wind Parties state that one of the Commission's goals with Order No. 1000 is "to increase the likelihood that transmission facilities in regional transmission plans are actually constructed."³⁴⁴ Wind Parties argue that interregional cost allocation methodologies that do not consider all the potential benefits of the project are less likely to meet required benefit to cost ratios and therefore are less likely to get built. Wind Parties assert that not building cost-effective projects because methodologies do not consider all benefits will result in rates that are not just and reasonable.³⁴⁵

146. MISO states that the Commission did not require that differences between regional projects be entirely removed for purposes of creating a distinct interregional project category. MISO also argues that Order No. 1000 does not require the creation of a distinct interregional project category that is independent of, much less trumps, regional project eligibility requirements.³⁴⁶ MISO states that Principle 6 permits, but does not require, separate types of projects for different transmission needs on the regional or interregional level. Thus, MISO contends that SPP cannot compel the creation of separate types of projects for economic, reliability, and/or public policy-related needs.³⁴⁷

147. In its answer, MISO reiterates that Interregional Cost Allocation Principle 6 permits, but does not require, separate types of transmission projects for different transmission needs, whether on the regional or interregional level, and, therefore, it is not required to create separate types of interregional cost allocation methods for economic, reliability, and/or public policy-related needs. MISO argues that it is also unnecessary to require separate interregional benefit metrics.³⁴⁸ MISO contends that Order No. 1000

³⁴³ *Id.* 16-17.

³⁴⁴ *Id.* 17 n.26 (filed Sept. 24, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 501).

³⁴⁵ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 17 (filed Sept. 24, 2013).

³⁴⁶ MISO Protest, Docket No. ER13-1937-000, at 8 (filed Sept. 9, 2013).

³⁴⁷ *Id.* 8.

³⁴⁸ MISO Answer, Docket No. ER13-1938-000, at 8 (filed Nov. 4, 2013). MISO contends that the SPP Transmission Owners are wrong in contending that MISO's proposed benefit metric may recognize disproportionately more benefits in MISO, which could allegedly be used to give MISO more "control" over an interregional facility. SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 5 (filed Sept. 9, 2013). MISO asserts that the SPP Transmission Owners purport to (*continued ...*)

allows, but does not require, consideration of transmission needs driven by public policy requirements in the interregional transmission coordination process.³⁴⁹ MISO argues that Market Efficiency Projects can also take public policy considerations into account. Finally, MISO argues that SPP has not proposed a metric to which MISO can respond and, thus, SPP's proposed development of a public policy metric is unripe for the Commission's consideration.³⁵⁰ MISO states that it would be willing to discuss with SPP a voluntary negotiation process similar to the process that MISO proposed for reliability projects in the MISO-PJM JOA (the Organization of MISO States' Option 1).³⁵¹ Finally, MISO states that the Multi-Value Project category does not align with SPP's regional cost allocation method and it would be unlikely that a single SPP-MISO interregional transmission project would be able to demonstrate benefits to the entire MISO footprint to justify the 100 percent regional cost allocation for Multi-Value Projects in MISO.³⁵²

iii. Commission Determination

148. We conditionally accept SPP's and MISO's proposals to comply with the cost allocation requirements for interregional transmission facilities in Order No. 1000, subject to a further compliance filing to address Interregional Cost Allocation Principle 6, as discussed below. We find that SPP and MISO have partially complied with Order No. 1000's requirements that neighboring regions propose a common interregional cost allocation method. As discussed in the General Requirements section of this order and below, SPP and MISO have submitted competing provisions regarding interregional cost allocation. However, SPP and MISO have complied with Order No. 1000's requirement

support their point by citing SPP's disagreement with MISO regarding the proposed market-to-market (M2M) provisions of the SPP-MISO JOA in Docket No. ER13-1864-000, including the issue of Firm Flow Entitlements (FFE) associated with flowgates between SPP and MISO. MISO Answer, Docket No. ER13-1938-000, at 8 n.24 (filed Nov. 4, 2013). MISO further asserts that the SPP Transmission Owners' invocation of the latter dispute is misplaced, as M2M protocols and FFEs only address the relief of seams congestion, not the ownership or control of interregional facilities. *Id.*

³⁴⁹ MISO Answer, Docket No. ER13-1938-000, at 8 (filed Nov. 4, 2013) (citing Order No. 1000-A, 139 FERC ¶ 61,132 at P 500).

³⁵⁰ MISO Answer, Docket No. ER13-1938-000, at 8 (filed Nov. 4, 2013).

³⁵¹ *Id.* 10.

³⁵² MISO Answer, Docket No. ER13-1938-000, at 10-11 (filed Nov. 4, 2013) (citing Curran Testimony at 6-7).

that an interregional transmission facility must be selected in each relevant regional transmission plan to be eligible for the proposed interregional cost allocation method.

149. As explained above, MISO proposes to require that an interregional transmission facility qualify as a Market Efficiency Project under the MISO Tariff and to use adjusted production cost as the sole benefit metric for reliability, economic and public policy transmission projects. We find that MISO's proposal to use adjusted production cost for interregional transmission facilities that address regional economic transmission needs is consistent with Interregional Cost Allocation Principles 1, 2, 3, 4, and 5. However, we find that MISO's proposal does not comply with Interregional Cost Allocation Principle 6 because it does not include an interregional cost allocation method for regional reliability needs and transmission needs driven by public policy requirements.

150. SPP proposes using adjusted production cost as the metric for economic projects, a combination of avoided cost and adjusted production cost for reliability projects, and another metric yet to be determined for public policy projects.³⁵³ We find that SPP's proposal to use to a combination of avoided cost and adjusted production cost for interregional transmission facilities that address regional reliability needs and adjusted production cost for interregional transmission facilities that address regional economic transmission needs is consistent with Interregional Cost Allocation Principles 1, 2, 3, 4, and 5. However, we find that SPP's proposal does not comply with Interregional Cost Allocation Principle 6 because it does not include an interregional cost allocation method for regional transmission needs driven by public policy requirements. Accordingly, SPP and MISO must revise their cost allocation proposals, as discussed below.

151. We find SPP's and MISO's proposals to allocate the cost of an interregional transmission facility meant to address economic needs complies with Interregional Cost Allocation Principles 1 and 2. We agree with SPP and MISO that using adjusted production costs to measure benefits allocates the costs of interregional transmission facilities addressing economic needs to SPP and MISO in a manner that is at least roughly commensurate with the estimated benefits of the interregional transmission facility, while ensuring that SPP and MISO are not involuntarily allocated the costs of those interregional transmission facilities from which they do not benefit.

152. We also find SPP's proposal to allocate the costs of an interregional transmission facility meant to address reliability needs complies with Interregional Cost Allocation Principles 1 and 2. We agree that SPP's proposal to use a combination of avoided costs³⁵⁴ and adjusted production cost savings allocates the costs of interregional

³⁵³ See SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0).

³⁵⁴ See *Midcontinent Indep. Sys. Operator, Inc. et al.*, 150 FERC ¶ 61,045, at PP 176-187 (2015).

transmission facilities addressing reliability needs to SPP and MISO in a manner that is at least roughly commensurate with the estimated benefits of the interregional transmission facility, while ensuring that SPP and MISO are not involuntarily allocated the costs of these interregional transmission facilities from which they do not benefit.

153. Regarding Interregional Cost Allocation Principle 3,³⁵⁵ we note that SPP's proposed interregional transmission cost allocation method for interregional transmission facilities addressing reliability needs and SPP's and MISO's proposed interregional transmission cost allocation method for interregional transmission facilities addressing economic needs do not include a benefit to cost threshold. Therefore, Interregional Cost Allocation Principle 3 does not apply.

154. We find that SPP's proposal complies with Interregional Cost Allocation Principle 4. SPP proposes that, as part of the evaluation of any proposed interregional transmission facility, the parties will determine whether the proposed interregional transmission facility has potential adverse impacts on the systems of other neighboring transmission planning regions. If the evaluation identifies any such potential adverse impact, the parties will contact and coordinate with the other potentially affected neighboring transmission planning region on the further evaluation of the potential adverse impact(s).³⁵⁶ MISO did not include a similar provision in its version of the SPP-MISO JOA, but commits in its answer to include such a provision. Accordingly, we direct MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to add a new section 9.3.3.4.1 to its version of the SPP-MISO JOA that matches the proposed language in SPP's version of the SPP-MISO JOA.

155. With respect to Interregional Cost Allocation Principle 5, SPP and MISO state that the allocation and benefit determination methods for reliability and economic transmission projects are specified in the SPP-MISO JOA, there are numerous opportunities for stakeholder participation, and the analysis of projected benefits are documented through studies and are published Coordinated System Plan, which is posted on the interregional planning websites. For these reasons, we find that SPP's and MISO's proposals meet the requirement of Interregional Cost Allocation Principle 5 that the cost allocation methods be transparent.

156. Interregional Cost Allocation Principle 6 specifies that the public utility transmission providers located in neighboring transmission planning regions have the flexibility to choose a different cost allocation method for different types of interregional

³⁵⁵ 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.

³⁵⁶ SPP, SPP-MISO JOA, art. IX, § 9.3.3.4.1 (0.0.0).

transmission facilities, such as interregional transmission facilities needed for reliability, congestion relief, or to achieve public policy requirements.³⁵⁷ The Commission noted that public utility transmission providers are permitted, but not required, to designate different types of transmission facilities, such as transmission facilities needed for reliability, congestion relief, or to achieve public policy requirements.³⁵⁸ This statement means that, unless public utility transmission providers decide to have a different cost allocation method for each different type of interregional transmission facility, then they must have one interregional cost allocation method that applies to all three types of interregional transmission facilities. Therefore, the ability to pick one of these approaches did not remove the requirement 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 transmission needs driven by reliability, economics, and public policy requirements.³⁵⁹ As discussed above, we find MISO's proposal to use adjusted production cost for interregional transmission facilities that address regional economic transmission needs consistent with Interregional Cost Allocation Principles 1, 2, 3, 4, and 5. Also discussed above, we find SPP's proposal to use a combination of avoided cost and adjusted production cost for interregional transmission facilities that address regional reliability needs and adjusted production cost for interregional transmission facilities that address regional economic transmission needs consistent with Interregional Cost Allocation Principles 1, 2, 3, 4, and 5. However, to comply with Interregional Cost Allocation Principle 6, SPP and MISO must also have an interregional cost allocation method that addresses regional transmission needs driven by public policy requirements, and MISO must include an interregional cost allocation method for regional reliability needs. Therefore, neither SPP's nor MISO's interregional cost allocation proposals fully comply with Interregional Cost Allocation Principle 6.

157. In addition, MISO's proposal to limit an interregional transmission facility to those that qualify as a Market Efficiency Project in MISO's regional transmission planning process does not comply with Order No. 1000 because MISO's regional cost allocation method for Market Efficiency Projects only accounts for regional economic benefits.³⁶⁰ In Order No. 1000, the Commission did not require public utility transmission providers to conduct interregional transmission planning and did not require

³⁵⁷ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 685.

³⁵⁸ *Id.* P 686.

³⁵⁹ *Id.*

³⁶⁰ *See* MISO First Regional Compliance Order, 142 FERC ¶ 61,215 at P 519.

them to produce an interregional transmission plan.³⁶¹ However, through the Commission's requirement that each public utility transmission provider identify interregional transmission facilities that may be more efficient or cost-effective than regional transmission facilities using its regional transmission planning process, the Commission expected public utility transmission providers to consider all types of *regional* transmission needs, including regional reliability, economic and public policy related transmission needs.³⁶² Moreover, in Order No. 1000-A, the Commission explained that consideration of whether an interregional transmission facility satisfied regional transmission needs driven by public policy requirements is an essential part of the evaluation of an interregional transmission project; not as part of interregional transmission coordination, but as part of the relevant regional transmission planning process.³⁶³ Because of this obligation to identify and evaluate interregional transmission projects to the extent that they might be more efficient or cost-effective in addressing *regional* reliability, economic, and public policy transmission needs, Order No. 1000 requires that the interregional cost allocation method must account for all benefits that were identified in the regional transmission planning processes. We therefore find that MISO's proposal to only consider Market Efficiency Projects fails to sufficiently consider all of the benefits that may accrue from an interregional transmission project. Thus, we find that the proposed interregional cost allocation method does not comply with Interregional Cost Allocation Principle 6.³⁶⁴

158. For these reasons, we conditionally accept SPP's cost allocation proposal for interregional transmission facilities addressing reliability needs in sections 9.6.3.1.1.b of the SPP-MISO JOA³⁶⁵ and SPP's and MISO's proposed cost allocation for interregional transmission facilities addressing economic needs in section 9.6.3.1.1 of SPP-MISO

³⁶¹ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 399.

³⁶² *Id.* P 368.

³⁶³ Order No. 1000-A, 139 FERC ¶ 61,132 at P 500.

³⁶⁴ See *PJM Interconnection, L.L.C.*, 149 FERC ¶ 61,250, at P 190 (2014) (finding that MISO's and PJM Transmission Owners' interregional cost allocation proposals for Cross-Border Market Efficiency Projects do not fully comply with Interregional Cost Allocation Principle 6, because to comply with Interregional Cost Allocation Principle 6, MISO and PJM must also have an interregional cost allocation method(s) for regional reliability and transmission needs driven by public policy requirements).

³⁶⁵ SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1.b (0.0.0).

JOA,³⁶⁶ subject to our acceptance of a further compliance filing to address Interregional Cost Allocation Principle 6.

159. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to propose a new interregional cost allocation method that applies to interregional transmission facilities addressing regional transmission needs driven by public policy requirements and are eligible to be selected in both SPP's and MISO's regional transmission planning processes for purposes of cost allocation. In addition, we direct MISO to submit, within 60 days of the date of issuance of this order, a further compliance filing to revise its version of the SPP-MISO JOA to adopt SPP's cost allocation method that applies to interregional transmission facilities addressing regional reliability transmission needs. We note, however, that to the extent SPP and MISO propose different interregional cost allocation method(s) for interregional transmission facilities addressing regional transmission needs driven by reliability, economics, and public policy requirements than we accept here, we will address those proposed interregional cost allocation method(s) in the order addressing the compliance filing directed herein.

c. Miscellaneous

160. SPP and MISO state that, while they disagree on certain aspects of the cost allocation of Interregional Projects, they agree on the proposed provisions regarding the determination of ownership rights and construction obligations with respect to Interregional Projects.³⁶⁷ SPP and MISO state that the proposed SPP-MISO JOA provides that SPP will enforce obligations to construct, own, and finance Interregional Projects in accordance with the SPP Tariff and the SPP Membership Agreement and MISO will enforce obligations to construct Interregional Projects in accordance with its Transmission Owners Agreement.³⁶⁸ SPP and MISO explain that, when an approved Interregional Project will interconnect only to transmission facilities under the control of one party, that party's tariff will designate the entity to construct, own, operate and finance the Interregional Project.³⁶⁹ SPP and MISO further explain that, when an

³⁶⁶ See, e.g., SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1.a (0.0.0); MISO, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0).

³⁶⁷ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 16; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 18.

³⁶⁸ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 16-17; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 18-19 (citing SPP, SPP-MISO JOA, art. IX, § 9.7 (0.0.0)).

approved Interregional Project will interconnect to transmission facilities under the control of both parties, the tariff used to designate the entity to construct, own, operate and finance the Interregional Project will be determined based on the proportion of benefits to each party, unless otherwise precluded by any applicable jurisdictional limitations.

i. Comments and Protests

161. Organization of MISO States argues that neither SPP's nor MISO's proposal include language on how to administer changes in interregional transmission project cost estimates.³⁷⁰ Organization of MISO States requests that the Commission direct SPP and MISO to include language on how changes to an interregional project cost estimate will be administered.³⁷¹

162. SPP Transmission Owners state that the cost allocation method is utilized not only to determine whether to build a interregional transmission project, but also to determine the proportion of the interregional transmission project that will be built and operated under each RTO's tariff.³⁷² SPP Transmission Owners request confirmation that the benefits test will only be used to determine the *proportion* of an interregional transmission project built and operated by each RTO, rather than *which* RTO tariff will govern the entire interregional transmission project. SPP Transmission Owners argue that it would be unjust and unreasonable to confer control of an entire interregional transmission project to an RTO that is projected to receive, for example, fifty-one percent of the benefits.³⁷³

³⁶⁹ MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 17; SPP Interregional Compliance Filing, Docket No. ER13-1937-00, at 19 (citing SPP, SPP-MISO JOA, art. IX, § 9.7.1 (0.0.0)).

³⁷⁰ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 17 (filed Sept. 9, 2013).

³⁷¹ *Id.* 18.

³⁷² SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 13 (filed Sept. 9, 2013) (citing MISO Interregional Compliance Filing, Docket No. ER13-1938-000, at 17).

³⁷³ SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 13 (filed Sept. 9, 2013).

ii. Answers

163. With regard to Organization of MISO States' request that the SPP-MISO JOA be revised to clarify how changes in interregional project cost estimates will be handled, SPP and MISO explain that, because any interregional transmission project must be approved through the regional transmission process, the regional processes of SPP and MISO will be applied, including the regional procedures related to changes in transmission project costs. MISO also notes that Order No. 1000 did not require development of an interregional process to address changes in interregional transmission project cost or that each interregional neighbor handle changes in project cost identically.³⁷⁴

164. With regard to the SPP Transmission Owners' request for confirmation that the benefits test will only be used to determine the *proportion* of an interregional project to be built and operated by each RTO,³⁷⁵ SPP and MISO clarify sections 9.7 and 9.7.1 of the SPP-MISO JOA. SPP and MISO explain that, when a tie-line interregional project interconnects with transmission facilities that are under the respective functional control of the neighboring RTOs and are respectively owned by adjacent transmission owners in each RTO, pursuant to section 9.6.3.1.1 of the MISO-SPP JOA, the benefits calculation would be used to determine the ownership shares of such transmission owners. SPP and MISO add that the ownership shares of such transmission owners would determine the tariff applicable to the portion respectively owned by the relevant MISO transmission owner and SPP transmission owner. SPP and MISO state that majority ownership does not determine the tariff that will govern the entire project or line. SPP and MISO state that, instead, the portion of the transmission project owned by a transmission owner will be governed by the tariff of that transmission owner's RTO. SPP and MISO state that, if there are jurisdictional limitations, the ownership for the transmission owner in each respective RTO will be determined in accordance with the identified jurisdictional boundaries. For example, SPP and MISO state that, if based on the benefits of the interregional project, the ownership would be split 50/50 between the respective RTOs but, due to the geographic location of the project, only a transmission owner from one RTO is permitted to construct and own transmission projects in that location, then that portion of the transmission project would be 100 percent subject to the RTO tariff of the transmission owner constructing the project. Likewise, SPP and MISO state that for

³⁷⁴ MISO Answer, Docket No. ER13-1938-000, at 18 (filed Nov. 4, 2013); SPP Answer, Docket No. ER13-1937-000, at 12 (filed Nov. 4, 2013).

³⁷⁵ *Id.* (citing SPP Transmission Owners Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 13 (filed Sept. 9, 2013) (emphasis in original)).

interregional transmission projects that are solely located within one RTO, the ownership and operation of that project will be subject to the tariff of the RTO where it is located.³⁷⁶

iii. Commission Determination

165. We find it unnecessary to require revisions to the SPP-MISO JOA to include language on how interregional transmission facility cost estimates will be reevaluated, as Organization of MISO States' requests. We agree with SPP and MISO that, because any interregional transmission facility must be approved through the regional transmission planning processes, the regional procedures for reevaluation related to changes in transmission project costs will apply. We also note that Order No. 1000 did not require development of an interregional process to address changes in interregional transmission project cost; therefore, this issue is beyond the scope of Order No. 1000.

166. With respect to SPP Transmission Owners' requested clarification regarding the determination of ownership rights and construction obligations, we accept SPP's and MISO's clarification in their answers. Accordingly, we direct SPP and MISO to submit, within 60 days of the date of issuance of this order, revisions to sections 9.7 (Network Upgrade Construction and Ownership) and 9.7.1 (Interregional Project Construction and Ownership) of the SPP-MISO JOA to provide the additional detail and examples provided in their answers.

d. Entergy

i. Comments and Protests

167. Arkansas Electric argues that it is forced to pay pancaked transmission rates whenever it serves load connected to the Entergy system with resources located in SPP or, more frequently, when it serves load in SPP with resources connected to Entergy transmission facilities because Entergy opted to join MISO rather than SPP.³⁷⁷ Arkansas Electric urges the Commission to require the elimination of rate pancaking between SPP and MISO as it did rate pancaking between MISO and PJM.³⁷⁸

³⁷⁶ MISO Answer, Docket No. ER13-1938-000, at 19 (filed Nov. 4, 2013); SPP Answer, Docket No. ER13-1937-000, 13 (filed Nov. 4, 2013).

³⁷⁷ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 8 (filed Sept. 9, 2013).

³⁷⁸ *Id.* 9 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 104 FERC ¶ 61,105, at P 39 (2003)).

168. Arkansas Electric states that this negative effect of rate pancaking is equally applicable to the seam that Entergy's integration into MISO will create between SPP and MISO. Arkansas Electric states that the new configuration will divide a highly integrated portion of the grid and will leave a portion of the MISO footprint – MISO South (i.e., Entergy, Central Louisiana Electric Company, and the many load serving entities embedded within their transmission systems) – barely contiguous with the rest of the MISO region.³⁷⁹ Arkansas Electric claims that this point is illustrated by the fact that MISO has only a 1000 megawatt contract path to the Entergy system. Finally, Arkansas Electric argues that this configuration will subject a significant number of transactions, including but not limited to Arkansas Electric's transactions to serve its members' loads, to continued rate pancaking at substantially higher rates. Arkansas Electric states that the failure of SPP and MISO to address this subject in their filings on interregional transmission coordination is not just and reasonable.³⁸⁰

169. Wind Parties argue that the single interconnection point between Entergy and MISO is insufficient to allow the capture of the benefits that have justified the finding that Entergy's membership in MISO was in the public interest. Wind Parties contend that more interconnections must be established to realize these benefits. Wind Parties further state that the integration of MISO North and South will create additional flows on neighboring systems and new transmission to connect MISO North and South will likely cross SPP, Associated Electric, or TVA. Wind Parties assert that it is unlikely that a test that merely involves calculations of adjusted production cost benefits will result in the development of needed transmission that crosses the adjoining regions. Wind Parties state that it seems probable that added flows between MISO North and South will increase congestion on the SPP system. Wind Parties contend that addressing the need for transmission will require a cost allocation tool that sufficiently identifies the benefits of such transmission and allocates its costs in a manner roughly commensurate with benefits. Wind Parties state that, otherwise, the benefits of resolving a serious reliability issue may not be reflected in an adjusted production cost model. Wind Parties claim that, as a result, SPP and MISO may not build needed transmission either because (1) the adjusted production cost model does not acknowledge benefits that would meet the

³⁷⁹ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 9-10 (filed Sept. 9, 2013) (citing Docket No. EL11-34, Affidavit of Carl A. Monroe on behalf of SPP at P 12 (May 9, 2011) (eLibrary accession no. 20110509-5162)).

³⁸⁰ Arkansas Electric Protest, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 10 (filed Sept. 9, 2013).

requirements of the required cost benefit ratios or (2) the benefits are so disproportional to the allocation of costs that one RTO will not agree to proceed.³⁸¹

170. The Organization of MISO States recommends that MISO clarify how the interregional cost allocation will be considered in relation to the FERC-approved five-year cost allocation process during the Entergy integration into MISO.³⁸² The Organization of MISO States seeks clarity as to how, if interregional transmission projects are identified and approved between the Entergy region and SPP, especially during the Entergy Transition period, the costs of those projects will be allocated amongst the MISO North and South regions. The Organization of MISO States seeks clarification as to whether SPP and MISO intend that the costs of any interregional transmission projects identified and approved during the five-year transition period will be allocated pursuant to the FERC-approved five-year transition period method so that any costs for an interregional transmission project that terminates within the MISO North or South region would be borne by only the MISO North or South region, respectively.³⁸³

ii. Answers

171. MISO asserts that the rate pancaking issue raised by Arkansas Electric is beyond the scope of this Order No. 1000 interregional compliance proceeding. It states that, pursuant to Order No. 1000, any such rate pancaking should have been raised in the stakeholder process preceding SPP's and MISO's interregional compliance filings.³⁸⁴

³⁸¹ Wind Parties Comments, Docket Nos. ER13-1937-000, ER13-1938-000, ER13-1939-000, and ER13-1945-000, at 22 (filed Sept. 24, 2013).

³⁸² Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 18 (filed Sept. 9, 2013) (citing *Midwest Independent Transmission System Operator, Inc., et al.*, 139 FERC ¶ 61,056 (2012)).

³⁸³ Organization of MISO States Comments, Docket Nos. ER13-1937-000 and ER13-1938-000, at 18-19 (filed Sept. 9, 2013) (citing Southern Region Workshop Update, Planning Advisory Committee of MISO, 6/26/2013. <https://www.midwestiso.org/Library/Repository/Meeting%20Material/Stakeholder/PAC/2013/20130626/20130626%20PAC%20Item%2010%20Southern%20Region%20Integration%20Workshop%20Highlights.pdf>).

³⁸⁴ MISO Answer, Docket No. ER13-1938-000, at 16 (filed Nov. 4, 2013) (citing Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 761, *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 at P 623) (“We decline to make new findings with respect to pancaked rates in this Final Rule as it is beyond the scope of this proceeding. In particular, we do not make any modifications to the Commission’s pancaked rate (*continued* ...)”)

MISO claims that, because Arkansas Electric failed to raise its rate pancaking concerns during MISO's stakeholder process that led to the SPP-MISO JOA filing, it should be barred from raising the issue at this juncture.³⁸⁵ SPP agrees that Arkansas Electric's arguments are outside the scope of Order No. 1000. SPP argues that the SPP stakeholder process is the appropriate venue to discuss rate pancaking issues and Arkansas Electric should address its concerns on a prospective basis through the appropriate SPP working groups.³⁸⁶

172. Arkansas Electric asserts that SPP's and MISO's argument that Arkansas Electric should now be barred from raising the rate pancaking issue because Arkansas Electric failed to raise its concerns during MISO's stakeholder process that led to the SPP-MISO JOA filing is factually incorrect and legally irrelevant. Arkansas Electric states that it did raise this concern during the stakeholder process on a number of occasions. Arkansas Electric states that the issues was raised on two occasions: (1) Ricky R. Bittle, Arkansas Electric's Vice President of Planning, Rates and Dispatching, raised the issue at a forum in Dallas, Texas on March 26, 2013 and (2) Robert Shields, Arkansas Electric's Senior Rate Analyst, Rates & Forecasting, did the same at a forum in St. Louis, Missouri on May 17, 2013. In addition, Arkansas states that on each occasion that written surveys were distributed to participants in the stakeholder process Arkansas Electric noted its concerns about rate pancaking. Arkansas claims that, in the first instance, Arkansas Electric added that concern to the list of issues the RTOs had prepared.³⁸⁷ Arkansas contends that, on at least one of those occasions, an SPP representative acknowledged receipt of Arkansas Electric's survey.³⁸⁸ Thus, Arkansas Electric argues that the fact that the proposed changes to the SPP-MISO JOA did not reflect Arkansas Electric's concerns about the increased cost of rate pancaking is a result of SPP's and MISO's lack of

provisions for an RTO under Order No. 2000. If rate pancaking is an issue in a particular transmission planning region, stakeholders may raise their concerns in the consultations leading to the compliance proceedings for this Final Rule or make a separate filing with the Commission under section 205 or 206 of the FPA, as appropriate.”).

³⁸⁵ MISO Answer, Docket No. ER13-1938-000, at 16 (filed Nov. 4, 2013).

³⁸⁶ SPP Answer, Docket No. ER13-1937-000, at 11 (filed Nov. 4, 2013).

³⁸⁷ Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3 (filed Nov. 19, 2013) (citing Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, Attachments 1 and 2).

³⁸⁸ Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3 (filed Nov. 19, 2013) (citing Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, Attachment 3).

responsiveness to Arkansas Electric's concerns, rather than Arkansas Electric's failure to articulate those concerns.³⁸⁹

173. Arkansas Electric further asserts that, even if it had not raised its concerns in the stakeholder process that would not lead to the conclusion that the Commission should not consider the issues raised in Arkansas Electric's protest. Arkansas Electric points out that, when the Commission issued a public notice of the filings and invited comments and protests by interested parties,³⁹⁰ the Commission did not limit the right to file comments and protests to parties that had participated in stakeholder processes. Arkansas Electric adds that the Commission is required to provide a "cogent response" and to "respond meaningfully" to arguments raised before it,³⁹¹ without regard to whether those arguments were first raised in a stakeholder process.

174. MISO responds that the cost allocation treatment of SPP-MISO interregional transmission projects during Entergy's five-year transition period will depend on the physical location of the project.³⁹²

iii. Commission Determination

175. We find that Arkansas Electric's claims regarding rate pancaking are beyond the scope of these proceeding. We note that the Commission has established hearing and settlement judge procedures in another proceeding to address this issue.³⁹³ We also find that Wind Parties' argument that the lack of transfer capacity between MISO North and MISO South will prevent a calculation of adjusted production costs from adequately valuing the benefits of an interregional transmission facility is beyond the scope of the interregional requirements of Order No. 1000.

³⁸⁹ Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3 (filed Nov. 19, 2013).

³⁹⁰ *Id.* (citing FERC Combined Notice of Filings #1 (July 12, 2013); Notice Granting an Extension of Time To Submit Comments on Interregional Compliance Filings (August 7, 2013).

³⁹¹ Arkansas Electric Answer, Docket Nos. ER13-1937-000 and ER13-1938-000, at 3-4 (filed Nov. 19, 2013) (citing *PPL Wallingford Energy LLC v. FERC*, 419 F.3d 1194, 1198-1200 (D.C. Cir. 2005); *PSEG Energy Resources & Trade, LLC v. FERC*, 360 F.3d 200, 205 (D.C. Cir. 2004)).

³⁹² MISO Answer, Docket No. ER13-1938-000, at 20 (filed November 4, 2013).

³⁹³ *See Southwest Power Pool, Inc.*, 146 FERC ¶ 61,231 (2014).

176. As to the Organization of MISO States' concern regarding Entergy's integration into MISO, we find that MISO's proposal to allocate its share of an interregional transmission facility's costs using the current regional cost allocation method during the five-year integration of Entergy Operating Companies and/or utilities adjacent to Entergy into MISO is sufficiently detailed in Attachment FF-6 of MISO's OATT and supported by the record. While Order No. 1000 states that the method for allocating a transmission planning region's share of the cost of an interregional transmission facility may differ from the method for allocating the cost of a regional transmission facility within that region,³⁹⁴ it does not require transmission planning regions to use a different cost allocation method to allocate its costs of an interregional transmission facility. Therefore, MISO can use its existing regional cost allocation method for allocating its share of an interregional transmission project. We note that the Commission has already accepted the cost allocation mechanism in MISO's existing OATT for Entergy's five-year transition into MISO.³⁹⁵ Regional and interregional transmission facilities that are evaluated and selected during the five-year transition period will be eligible to use the appropriate regional cost allocation method based on the type of transmission facility.

The Commission orders:

(A) SPP's and MISO's compliance filings are hereby conditionally accepted, as modified, subject to a further compliance filing, as discussed in the body of this order.

(B) SPP and MISO 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.

(C) Entergy's compliance filing is hereby rejected, as discussed in the body of this order.

(D) Cleco's compliance filing is hereby rejected, as discussed in the body of this order.

By the Commission. Commissioner Honorable is not participating.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

³⁹⁴ Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 733.

³⁹⁵ *Midwest Indep. Transmission Sys. Operator, Inc.*, 139 FERC ¶ 61,056 (2012), *order on reh'g*, 141 FERC ¶ 61,128 (2012).

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

**SPP Interregional Compliance Filing
Docket No. ER13-1937-000**

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
American Transmission Company LLC	American Transmission Company LLC
Arkansas Electric	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Springfield	City of Springfield, Missouri
Public Interest Organizations	Climate & Energy Project and the Sustainable FERC Project
ATC/Duke	Duke-American Transmission Company, LLC, DATC Midwest

	Holdings, American Transmission Company LLC, and Duke Energy Transmission Holding Company
East Texas Cooperatives	East Texas Cooperatives
Empire District Electric Company	Empire District Electric Company
E.ON Climate & Renewables North America LLC	E.ON Climate & Renewables North America LLC
Exelon	Exelon Corporation
Florida Commission	Florida Public Service Commission
Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
Indiana Commission	Indiana Utility Regulatory Commission
ITC Companies	International Transmission Company; Michigan Electric Transmission Company, LLC; ITC Midwest LLC Company
KCP&L	Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company
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	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois;

American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

Oklahoma Gas and Electric Company

Oklahoma Gas and Electric Company

Omaha Public Power District

Omaha Public Power District

Rockland Electric Company

Rockland Electric Company

Sunflower Electric Power Corporation
and Mid-Kansas Electric Company,
LLC

Sunflower Electric Power Corporation
and Mid-Kansas Electric Company,
LLC

Transource Energy, LLC

Transource Energy, LLC

Westar Energy, Inc.

Westar Energy, Inc.

Western Farmers

Western Farmers Electric Cooperative

Wisconsin Electric Power Company

Wisconsin Electric Power Company

Xcel

Xcel Energy Services, Inc.

MISO Interregional Compliance Filing
Docket No. ER13-1938-000

Abbreviation	Intervenor(s)
Ameren	Ameren Services Company (on behalf of its affiliated operating companies: Ameren Illinois Company and Union Electric Company d/b/a Ameren Missouri; and on behalf of its affiliated marketing and generating companies: Ameren Energy Marketing Company, Ameren Energy Generating Company and AmerenEnergy Resources Generating Company (collectively, the Ameren Companies))
AEP	American Electric Power Service Corporation
American Transmission Company	American Transmission Company LLC
Arkansas Electric	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Springfield	City of Springfield, Missouri

Public Interest Organizations	Climate & Energy Project and the Sustainable FERC Project
Consumers Energy Company	Consumers Energy Company
DATC Midwest Holdings, LLC	DATC Midwest Holdings, LLC
ATC/Duke	Duke-American Transmission Company, LLC, American Transmission Company LLC, and Duke Energy Transmission Holding Company
Duke Energy Corporation	Duke Energy Corporation
Duke Energy Transmission Holding Company, LLC	Duke Energy Transmission Holding Company, LLC
East Texas Cooperatives	East Texas Cooperatives
Empire District Electric Company	Empire District Electric Company
E.ON Climate & Renewables North America LLC	E.ON Climate & Renewables North America LLC
Exelon	Exelon Corporation
Florida Commission	Florida Public Service Commission
Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
Indiana Commission	Indiana Utility Regulatory Commission
International Transmission Company	International Transmission Company
KCP&L	Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy

MISO Transmission Owners

MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power

	Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)
Four Public Interest Organizations	Natural Resources Defense Council, Inc., Sierra Club, Southern Environmental Law Center and Sustainable FERC Project
Oklahoma Gas and Electric Company	Oklahoma Gas and Electric Company
Omaha Public Power District	Omaha Public Power District
Rockland Electric Company	Rockland Electric Company
SPP	Southwest Power Pool, Inc.
Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC	Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC
Transource Energy, LLC	Transource Energy, LLC
Westar Energy, Inc.	Westar Energy, Inc.
Western Farmers	Western Farmers Electric Cooperative
Wisconsin Electric Power Company	Wisconsin Electric Power Company

SPP Tariff Filing
Docket No. ER13-1939-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
American Transmission Company	American Transmission Company LLC
Arkansas Electric	Arkansas Electric Cooperative Corporation
Associated Electric Cooperative, Inc.	Associated Electric Cooperative, Inc.
Public Interest Organizations	Climate & Energy Project and the Sustainable FERC Project
Dalton Utilities	Dalton Utilities
ATC/Duke	Duke-American Transmission Company, LLC, American Transmission Company LLC, and Duke Energy Transmission Holding Company
Duke Energy Carolinas	Duke Energy Carolinas, LLC (DEC), Duke Energy Progress, Inc. (DEP) and Duke Energy Florida, Inc. (DEF)
East Texas Cooperatives	East Texas Cooperatives
Empire District Electric Company	Empire District Electric Company
E.ON Climate & Renewables North America LLC	E.ON Climate & Renewables North America LLC
Exelon	Exelon Corporation
Florida Commission	Florida Public Service Commission
Georgia Transmission Corporation	Georgia Transmission Corporation

Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
International Transmission Company	International Transmission Company
KCP&L	Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company
LG&E-KU	Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU)
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, and WPPI Energy
MEAG Power	Municipal Electric Authority of Georgia
MISO Transmission Owners	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy

Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

Four Public Interest Organizations

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

North Carolina Commission

North Carolina Utilities Commission

OVEC

Ohio Valley Electric Corporation

PowerSouth Energy Cooperative

PowerSouth Energy Cooperative

Rockland Electric Company

Rockland Electric Company

South Carolina Office of Regulatory Staff

South Carolina Office of Regulatory Staff

South Mississippi Electric Power Association

South Mississippi Electric Power Association

Southern Company Services, Inc.

Southern Company Services, Inc.

Sunflower Electric Power Corporation

Sunflower Electric Power Corporation

and Mid-Kansas Electric Company,
LLC

and Mid-Kansas Electric Company,
LLC

TVA

Tennessee Valley Authority

Transource Energy, LLC

Transource Energy, LLC

Western Farmers

Western Farmers Electric Cooperative

Xcel

Xcel Energy Services Inc.

MISO Tariff Filing
Docket No. ER13-1945-000

Abbreviation	Intervenor(s)
Ameren	Ameren Services Company
AEP	American Electric Power Service Corporation
American Transmission Company	American Transmission Company LLC
Arkansas Electric	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Associated Electric Cooperative, Inc.	Associated Electric Cooperative, Inc.
Public Interest Organizations	Climate & Energy Project and the Sustainable FERC Project
Consumers Energy Company	Consumers Energy Company
Dalton Utilities	Dalton Utilities
ATC/Duke	Duke-American Transmission Company, LLC, and DATC Midwest Holdings, LLC

Duke Energy Corporation	Duke Energy Corporation
Duke Energy Transmission Holding Company	Duke Energy Transmission Holding Company
Nine Public Interest Organizations	Earthjustice, Environmental Law and Policy Center, National Audubon Society, Natural Resources Defense Council, Pace Energy and Climate Center, Sierra Club, Southern Environmental Law Center, Sustainable FERC Project and Union of Concerned Scientists
E.ON Climate & Renewables North America LLC	E.ON Climate & Renewables North America LLC
Exelon	Exelon Corporation
Florida Commission	Florida Public Service Commission
Georgia Transmission Corporation	Georgia Transmission Corporation
Indiana Office of Utility Consumer Counselor	Indiana Office of Utility Consumer Counselor
Indiana Commission	Indiana Utility Regulatory Commission
International Transmission Company	International Transmission Company
KCP&L	Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company
LG&E-KU	Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU)
Maryland Commission	Maryland Public Service Commission
Midwest TDUs	Madison Gas and Electric Company, Missouri Joint Municipal Electric

	Utility Commission, Missouri River Energy Services, and WPPI Energy
MEAG Power	Municipal Electric Authority of Georgia
MISO	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi

	Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)
NIPSCO	Northern Indiana Public Service Company
OVEC	Ohio Valley Electric Corporation
ODEC	Old Dominion Electric Cooperative
PJM	PJM Interconnection, LLC
PowerSouth Energy Cooperative	PowerSouth Energy Cooperative
PPL PJM Companies *	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	PSEG Companies
Rockland Electric Company	Rockland Electric Company
South Mississippi Electric Power Association	South Mississippi Electric Power Association
Southern Company Services, Inc.	Southern Company Services, Inc.
Transource Energy, LLC	Transource Energy, LLC
Western Farmers	Western Farmers Electric Cooperative

Wisconsin Electric Power Company

Wisconsin Electric Power Company

*late motion for intervention

Entergy Compliance Filing
Docket No. ER13-1955-000

Abbreviation	Intervenor(s)
AEP	American Electric Power Service Corporation
Lafayette Utilities System	Lafayette Utilities System
Louisiana Energy and Power Authority	Louisiana Energy and Power Authority
MISO	Midcontinent Independent System Operator, Inc.
Rockland Electric Company	Rockland Electric Company

Cleco Compliance Filing
Docket No. ER13-1956-000

Abbreviation	Intervenor(s)
Lafayette Utilities System	Lafayette Utilities System
Louisiana Energy and Power Authority	Louisiana Energy and Power Authority
MISO	Midcontinent Independent System Operator, Inc.
Rockland Electric Company	Rockland Electric Company

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

**SPP Interregional Compliance Filing
Docket No. ER13-1937-000**

Abbreviation	Intervenor(s)
Wind Parties* ++	American Wind Energy Association (AWEA), Wind on the Wires (WOW) and the Mid-Atlantic Renewable Energy Coalition (MAREC)
Arkansas Electric+	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Public Interest Organizations+	Climate & Energy Project and the Sustainable FERC Project
ATC/Duke+	Duke-American Transmission Company, LLC, DATC Midwest Holdings, American Transmission Company LLC, and Duke Energy

	Transmission Holding Company
East Texas Cooperatives+	East Texas Cooperatives
Indiana Commission+	Indiana Utility Regulatory Commission
MISO+	Midcontinent Independent System Operator, Inc.
MISO Transmission Owners+	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company;

Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

SPP Transmission Owners (*each of whom intervened separately*)

SPP Transmission Owners (Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company; American Electric Power Service Company, on behalf of Public Service Company of Oklahoma and Southwestern Electric Power Company; Lincoln Electric System; Omaha Public Power District; The Empire District Electric Company; Westar Energy, Inc.; City Utilities of Springfield, Missouri; Sunflower Electric Power Corporation; Mid-Kansas Electric Company, LLC; Nebraska Public Power District; and Oklahoma Gas & Electric Company)

Western Farmers

Western Farmers Electric Cooperative

Xcel+

Xcel Energy Services, Inc.

* late comments

+ protest

++ Not an intervenor in this docket

MISO Interregional Compliance Filing
Docket No. ER13-1938-000

Abbreviation	Intervenor(s)
Wind Parties* ++	American Wind Energy Association (AWEA), Wind on the Wires (WOW) and the Mid-Atlantic Renewable Energy Coalition (MAREC)
Arkansas Electric+	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Public Interest Organizations+	Climate & Energy Project and the Sustainable FERC Project
ATC/Duke+	Duke-American Transmission Company, LLC, DATC Midwest Holdings, American Transmission Company LLC, and Duke Energy Transmission Holding Company
East Texas Cooperatives+	East Texas Cooperatives
Indiana Commission+	Indiana Utility Regulatory Commission
MISO Transmission Owners+	MISO Transmission Owners (Ameren

Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

SPP

Southwest Power Pool

SPP Transmission Owners (*each of whom intervened separately*)

SPP Transmission Owners (Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company; American Electric Power Service Company, on behalf of Public Service Company of Oklahoma and Southwestern Electric Power Company; Lincoln Electric System; Omaha Public Power District; The Empire District Electric Company; Westar Energy, Inc.; City Utilities of Springfield, Missouri; Sunflower Electric Power Corporation; Mid-Kansas Electric Company, LLC; Nebraska Public Power District; and Oklahoma Gas & Electric Company)

Western Farmers

Western Farmers Electric Cooperative

* late comments

+ protest

++ Not an intervenor in this docket

SPP Tariff Filing
Docket No. ER13-1939-000

Abbreviation	Intervenor(s)
Wind Parties* ++	American Wind Energy Association (AWEA), Wind on the Wires (WOW) and the Mid-Atlantic Renewable Energy Coalition (MAREC)
Arkansas Electric+	Arkansas Electric Cooperative Corporation
SERTP Sponsors (<i>each of whom intervened separately</i>)	Associated Electric Cooperative, Inc.; Dalton Utilities; Duke Energy Carolinas, LLC; Duke Energy Progress, Inc.; Georgia Transmission Corporation; Louisville Gas and Electric Company and Kentucky Utilities Company; the Municipal Electric Authority of Georgia; Ohio Valley Electric Corporation; PowerSouth Energy Cooperative; Southern Company Services, Inc.; the South Mississippi Electric Power Association; and the Tennessee Valley Authority
Public Interest Organizations+	Climate & Energy Project and the Sustainable FERC Project
MISO Transmission Owners+	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power

Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

Western Farmers

Western Farmers Electric Cooperative

Xcel+

Xcel Energy Services, Inc.

* late comments

+ protest

++ Not an intervenor in this docket

MISO Tariff Filing
Docket No. ER13-1945-000

Abbreviation	Intervenor(s)
Wind Parties* ++	American Wind Energy Association (AWEA), Wind on the Wires (WOW) and the Mid-Atlantic Renewable Energy Coalition (MAREC)
Arkansas Electric+	Arkansas Electric Cooperative Corporation
Organization of MISO States	Arkansas Public Service Commission, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Iowa Utilities Board, Kentucky Public Service Commission, Michigan Public Service Commission, Minnesota Public Utilities Commission, Missouri Public Service Commission, Montana Public Service Commission, City of New Orleans, North Dakota Public Service Commission, South Dakota Public Utilities Commission, Texas Public Utility Commission and Wisconsin Public Service Commission
Public Interest Organizations+	Climate & Energy Project and the Sustainable FERC Project
ATC/Duke	Duke-American Transmission Company, LLC, American Transmission Company LLC, and Duke Energy Transmission Holding Company
Nine Public Interest Organizations+	Earthjustice, Environmental Law and Policy Center, National Audubon Society, Natural Resources Defense Council, Pace Energy and Climate Center, Sierra Club, Southern Environmental Law Center, Sustainable

FERC Project and Union of Concerned
Scientists

Exelon

Exelon Corporation+

NIPSCO+

Northern Indiana Public Service
Company

PJM

PJM Interconnection, LLC+

PJM Transmission Owners+ ++

PJM Transmission Owners

* Late comments

+ Protest

++ Not an intervenor in this docket

Appendix C: Abbreviated Names of Reply Commenters

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

Reply Commenters

**SPP Interregional Compliance Filing
Docket No. ER13-1937-000**

Abbreviation	Intervenor(s)
Arkansas Electric	Arkansas Electric Cooperative Corporation
ATC/Duke	Duke-American Transmission Company, LLC, American Transmission Company LLC, and Duke Energy Transmission Holding Company
SPP (<i>filed separate answers on 9/24/13 and 11/4/13</i>)	Southwest Power Pool, Inc.

**MISO Interregional Compliance Filing
Docket No. ER13-1938-000**

Abbreviation	Intervenor(s)
Arkansas Electric	Arkansas Electric Cooperative Corporation
ATC/Duke	Duke-American Transmission Company, LLC, American Transmission Company LLC, and Duke Energy Transmission Holding Company
MISO	Midcontinent Independent System Operator, Inc.

SPP Tariff Filing

Docket No. ER13-1939-000

Abbreviation	Intervenor(s)
SPP	Southwest Power Pool, Inc.

MISO Tariff Filing
Docket No. ER13-1945-000

Abbreviation	Intervenor(s)
Exelon	Exelon Corporation
MISO Transmission Owners	MISO Transmission Owners (Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri; Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Entergy Arkansas, Inc.; Entergy Louisiana, LLC; Entergy Gulf States Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy New Orleans, Inc.; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a

Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power Inc.; South Mississippi Electric Power Association; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.)

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
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. II, § 2.2 (Definitions) (0.0.1).	
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.1 (Joint Planning Committee) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1. (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.1.1 (Joint Planning Committee Responsibilities) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.1.2 (Participating in Multi-Party Studies) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.1.3 (Joint Planning Committee Voting Process) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.3 (0.0.0).

SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.1.4 (Interregional Coordination Webpage) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.4 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.2 (Interregional Planning Stakeholder Advisory Committee) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.2 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.2.1 (Interregional Planning Stakeholder Advisory Committee Structure) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.2.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.2.2 (Interregional Planning Stakeholder Advisory Committee Responsibilities) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.2.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.1.2.3 (Interregional Planning Stakeholder Advisory Committee Voting Process) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.2.3 (0.0.0).

SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.2 (Data and Information Exchange) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.2 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.2.1 (Annual Data and Information Exchange Requirement) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.2.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.2.2 (Data and Information Exchange Upon Request) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.2.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3 (Coordinated System Planning) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.2 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.1 (Single Party Planning) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.1 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2 (Annual Transmission Issues Evaluation) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.1.1.2 (0.0.0).

SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2.1 (Process for Submitting Transmission Issues for Review) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.2.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2.2 (Interregional Planning Stakeholder Advisory Committee Annual Issues Evaluation Meeting(s)) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.2.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2.3 (Interregional Planning Stakeholder Advisory Committee Review of Identified Transmission Issues) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.2.3 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2.4 (Joint Planning Committee Decision Process) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.2.4 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.2.5 (Interregional Planning Stakeholder Advisory Committee Review of Joint Planning Committee	SPP, SPP-MISO JOA, art. IX, § 9.3.2.5 (0.0.0).

SPP	ER13-1937-000	Determination of the Need for a Coordinated System Plan Study) (0.0.0). SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3 (Coordinated System Plan Study) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.1 (Coordinated System Plan Study Scope Development) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.2 (Model Development for a Coordinated System Plan Study) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.3 (Study Analysis) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.3 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.4 (Identifying Interregional Solutions) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.4 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.4.1	SPP, SPP-MISO JOA, art. IX, § 9.3.3.4.1 (0.0.0).

SPP	ER13-1937-000	(Evaluating Potential Impact of Proposed Interregional Projects to Other Transmission Planning Regions) (0.0.0). SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.5 (Interregional Project Recommendation Process) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.5 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.5.1 (Coordinated System Planning Study Report and Interregional Planning Stakeholder Advisory Committee Recommendation) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.5.2 (Joint Planning Committee Interregional Project Recommendation) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.5.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.3.6 (Regional Approval Process) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.3.6 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.4 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.4 (1.0.0).

SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.5 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.5 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.5.1 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.5.1 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.3.5.2 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.3.5.2 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.4 (Analysis of Interconnection Requests) (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.4 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.4.1 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.4.1 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.4.2 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.4.2 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.4.3 (1.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.4.3 (1.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.5 (Analysis of Long Term Firm	SPP, SPP-MISO JOA, art. IX, § 9.5 (1.0.0).

		Transmission Service Requests) (1.0.0).	
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6 (Allocation of Costs of Network Upgrades) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.1 (Network Upgrades Associated with Interconnections) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.2 (Network Upgrades Associated with Transmission Service Requests) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.3 (Network Upgrades Under Coordinated System Plan) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.3 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.3.1 (Criteria for Project Designation as an Interregional Project) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.3.1 (0.0.0).

SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.3.1.1 (Determination of Benefits to each RTO from Interregional Project) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.3.2 (Cost Allocation and Recovery for Interregional Projects) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.3.2 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.6.3.3 (Quarterly Status Reporting of Interregional Projects) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.6.3.3 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.7 (Network Upgrade Construction and Ownership) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.7 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.7.7 (Interregional Project Construction and Ownership) (0.0.0).	SPP, SPP-MISO JOA, art. IX, § 9.7.7 (0.0.0).
SPP	ER13-1937-000	SPP, Rate Schedules and Seams Agreements Tariff, Rate Schedule 9 (MISO-SPP Joint Operating Agreement), art. IX, § 9.8 (CMP	SPP, SPP-MISO JOA, art. IX, § 9.8 (0.0.0).

		Allocation Adjustments for Interregional Project - Reserved for Future Use) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. II, § 2.2 (Definitions) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.1. (Joint Planning Committee) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.1.1 (Joint Planning Committee Responsibilities) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.1.2 (Participating in Multi-Party Studies) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.1.3 (Joint Planning Committee Voting Process) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.1.4 (Interregional Coordination Webpage) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.2 (Interregional Planning Stakeholder

		Advisory Committee) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.2.1 (Interregional Planning Stakeholder Advisory Committee Structure) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.2.2 (Interregional Planning Stakeholder Advisory Committee Responsibilities) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.1.2.3 (Interregional Planning Stakeholder Advisory Committee Voting Process) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.2 (Data and Information Exchange) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.2.1 (Annual Data and Information Exchange Requirement) (0.0.0).

MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.2.2 (Data and Information Exchange Upon Request) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3 (Coordinated System Planning) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.1 (Single Party Planning) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2 (Annual Transmission Issues Evaluation) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2.1 (Process for Submitting Transmission Issues for Review) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2.2 (Interregional Planning Stakeholder Advisory Committee Annual Issues Evaluation Meeting(s)) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2.3 (Interregional Planning Stakeholder Advisory

		Committee Review of Identified Transmission Issues) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2.4 (Joint Planning Committee Decision Process) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.2.5 (Interregional Planning Stakeholder Advisory Committee Review of Joint Planning Committee Determination of the Need for a Coordinated System Plan Study) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3 (Coordinated System Plan Study) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.1 (Coordinated System Plan Study Scope Development) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.2 (Model Development for a Coordinated System Plan Study) (1.0.0).

MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.3 (Study Analysis) (1.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.4 (Identifying Interregional Solutions) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.5 (Interregional Project Recommendation Process) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.5.1 (Coordinated System Planning Study Report and Interregional Planning Stakeholder Advisory Committee Recommendation) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.5.2 (Joint Planning Committee Interregional Project Recommendation) (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.3.3.6 (Regional Approval Process) (0.0.0).

MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.4 (Analysis of Interconnection Requests) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.5 (Analysis of Long Term Firm Transmission Service Requests) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6 (Allocation of Costs of Network Upgrades) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.1 (Network Upgrades Associated with Interconnections) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.2 (Network Upgrades Associated with Transmission Service Requests) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.3 (Network Upgrades Under Coordinated System Plan) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.3.1 (Criteria for	MISO, SPP-MISO JOA, art. IX, § 9.6.3.1 (0.0.0).

		Project Designation as an Interregional Project) (0.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.3.1.1 (Determination of Benefits to each RTO from Interregional Project) (0.0.0).	MISO, SPP-MISO JOA, art. IX, § 9.6.3.1.1 (0.0.0).
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.3.2 (Cost Allocation and Recovery for Interregional Projects) (0.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.6.3.3 (Quarterly Status Reporting of Interregional Projects) (0.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.7 (Network Upgrade Construction and Ownership) (1.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.7.7 (Interregional Project Construction and Ownership) (0.0.0).	
MISO	ER13-1938-000	MISO, MISO Rate Schedules, Joint Operating Agreement MISO and SPP, art. IX, § 9.8 (CMP Allocation Adjustments for Interregional Project -	

		Reserved for Future Use) (0.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Part I, § 1, Definitions I (Definitions I) (1.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Part I, § 1, Definitions R (Definitions R) (3.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment H (Annual Transmission Revenue Requirement for Network Integration Transmission Service) (28.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment J, § II (Network Upgrades) (1.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment J, § VI (Interregional Projects as Network Upgrades) (1.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment L, § III (Distribution of Revenues From Base Plan Zonal Charges and Region- wide Charges and Interregional Projects) (3.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § I (Overview of Planning Process) (1.0.0).

SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § II (Roles and Responsibilities) (3.0.0).	
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § IV (Other Planning Studies) (2.0.0).	
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § V (The SPP Transmission Expansion Plan) (1.0.0).	
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § VI (Construction of Transmission Facilities) (3.0.0).	SPP, OATT, Attachment O, § VI (3.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, § VIII (Interregional Planning) (1.0.0).	SPP, OATT, Attachment O, § VIII (1.0.0).
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Attachment O, Addendum 1 (Interregional Coordination Agreements) (1.0.0).	
SPP	ER13-1939-000	SPP, OATT, Sixth Revised Volume No. 1, Part IV, Attachment O, Addendum 3 (Interregional Transmission Coordination Between the Transmission Provider and the Midwest Independent Transmission System Operator, Inc.)(0.0.0).	
MISO	ER13-1945-000	MISO, FERC Electric Tariff, Attachment FF (Transmission Expansion Planning Protocol) (14.0.0).	MISO, Tariff, Attachment FF (14.0.0).