

Draft Inter-Regional Participation Process

October 31, 2007

Introduction:

In an effort to more fully address the regional participation principle outlined in the Order 890 Attachment K Tariff requirements and the related guidance contained in the FERC Transmission Planning Process Staff White Paper (dated August 2, 2007), we propose to expand upon the existing processes for regional planning in the Southeast. This document is intended to outline an inter-regional process among various Southeastern interconnected transmission owners. The inter-regional process described herein will be incorporated into each Participating Transmission Provider's planning process and OATT Attachment K (for those transmission providers that have a regulatory requirement to file an Attachment K).

Purpose:

This inter-regional process would serve to complement the regional planning processes developed by the Participating Transmission Providers in the Southeast. For the purpose of this document, the term "Inter-Regional Participation Process" ("IRPP") is defined as a new process to more fully address the regional participation principle of Order 890 for multiple transmission systems in the Southeast. The term "Regional Planning Processes" refers to the regional transmission planning processes a Transmission Provider has established within their particular region for Attachment K purposes.

Current Inter-Regional Planning Process:

Each Southeastern transmission provider currently develops a transmission plan to account for service to its native load and other firm transmission service commitments on its transmission system. This plan development is the responsibility of each transmission planner individually and does not directly involve the Regional Reliability Organization (e.g. SERC). Once developed, the Participating Transmission Providers collectively conduct inter-regional reliability transmission assessments, which include the sharing of the individual transmission system plans, providing information on the assumptions and data inputs used in the development of those plans and assessing whether the plans are simultaneously feasible.

Participating Transmission Providers:

Due to the additional regional planning coordination principals that have been announced in Order 890 and the associated Transmission Planning White Paper, the following transmission providers have agreed to provide additional transmission planning coordination, as further described in this document. The below identified transmission providers are referred to as the "Participating Transmission Providers":

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Alabama Electric Cooperative, Progress Energy Carolinas,
 Duke Energy Carolinas, Santee Cooper,
 Dalton Utilities, South Carolina Electric & Gas,
 South Mississippi Electric Power Association, Entergy,
 Georgia Transmission Corporation, Southern Companies,
 Municipal Electric Authority of Georgia, Tennessee Valley Authority,

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Proposed Inter-Regional Participation Process:

The Inter-Regional Participation Process is outlined in the attached diagram. As shown in that diagram, this process will provide a means for conducting stakeholder requested Economic Planning Studies across multiple interconnected systems. In addition, this process will build on the current inter-regional, reliability planning processes required by existing multi-party reliability agreements to allow for additional participation by stakeholders.

The established Regional Planning Processes outlined in the Participating Transmission Providers' Attachment Ks will be utilized for collecting data, coordinating planning assumptions, and addressing stakeholder requested Economic Planning Studies internal to their respective regions. The data and assumptions developed at the regional level will then be consolidated and used in the development of models for use in the proposed Inter-Regional Participation Process. This will ensure consistency in the planning data and assumptions used in local, regional, and inter-regional planning processes.

These established Attachment K processes may also serve as a mechanism to collect requests for inter-regional Economic Planning Studies by a participant's stakeholders group. The Economic Planning Studies requested through each participant's Attachment K process that involve impacts on multiple systems will be consolidated and evaluated as part of the Inter-Regional Participation Process. Stakeholders will also be provided the opportunity to submit their requests for inter-regional Economic Planning Studies directly to the Inter-Regional process. The Inter-Regional Participation Process will be described and included within each of the Participating Transmission Provider's Attachment K filings (as applicable).

The Participating Transmission Providers recognize the importance of coordination with neighboring (external) planning processes. Therefore, seams coordination will take place at the regional level where external regional planning processes adjoin the Inter-Regional Participation Process (e.g. Southeastern Regional Planning Process coordinating with FRCC Regional Planning Process, Entergy coordinating with SPP, TVA coordinating with MISO and PJM, and the North Carolina Transmission Planning Collaborative coordinating with PJM). External coordination is intended to include planning assumptions from neighboring processes and the coordination of transmission enhancements and stakeholder requested Economic Planning Studies to support the

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development of simultaneously feasible transmission plans both internal and external to the Inter-Regional Participation Process.

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With regard to the development of the stakeholder requested inter-regional Economic Planning Studies, the Participating Transmission Providers will each provide staff (transmission planners) to serve on the study coordination team. The study coordination team will lead the development of study assumptions (and coordinate with stakeholders, as discussed further below), perform model development, and perform any other coordination efforts with stakeholders and impacted external planning processes. During the study process, the study coordination team will also be responsible for performing analysis, developing solution options, evaluating stakeholder suggested solution options, and developing a report(s) once the study(ies) is completed. Once the study(ies) is completed, the study coordination team will distribute the report(s) to all Participating Transmission Providers and the stakeholders.

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With regard to coordinating with stakeholders in the development of the inter-regional Economic Planning Study(ies), in each cycle of this Inter-Regional Participation Process, the Participating Transmission Providers will conduct the “1st Inter-Regional Stakeholder Meeting”, as shown in the attached diagram. At this meeting, a review of all of the Economic Planning Study(ies) submitted through the participants’ Regional Planning Processes or directly to the Inter-Regional process, along with any additional Economic Planning Study requests that are submitted at this 1st meeting, will be conducted. During this meeting, the stakeholders will select up to five studies that will be evaluated within the planning cycle. The study coordination team will coordinate with the stakeholders regarding the study assumptions underlying the identified stakeholder requested inter-regional Economic Planning Study(ies). Through this process, stakeholders will be provided an opportunity to comment and provide input regarding those assumptions.

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Following that meeting, and once the study coordination team has an opportunity to perform its initial analyses of the inter-regional Economic Planning Study(ies), the Participating Transmission Providers will then conduct the “2nd Inter-Regional Stakeholder Meeting.” At this meeting, the study coordination team will review the results of such initial analysis, and stakeholders will be provided an opportunity to comment and provide input regarding that initial analysis. The study coordination team will then finalize its analysis of the inter-regional study(ies) and draft the Economic Planning Study(ies) report(s), which will be presented to the stakeholders at the “3rd Inter-Regional Stakeholder Meeting.” Stakeholders will be provided an opportunity to comment and provide input regarding the draft report(s). Subsequent to that meeting, the study coordination team will then finalize the report(s), which will be issued to the Participating Transmission Providers and stakeholders.

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In addition to performing inter-regional Economic Planning Studies, the Inter-Regional Participation Process will also provide a means for the Participating Transmission Providers to review, at the Inter-Regional Participation Process stakeholder meetings, the regional data, assumptions, and assessments that are then being performed on an inter-regional basis.

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Inter-Regional Participation Process Cycle:

The Inter-Regional Participation Process will be performed annually. Due to the expected scope of the requested studies and size of the geographical region encompassed, the Participating Transmission Providers will perform up to five (5) inter-regional Economic Planning Studies annually, which could encompass both Step 1 and Step 2 evaluations. A Step 1 evaluation will consist of a high level screen of the requested transfer and will be performed during a single year’s planning cycle. The high level screen will identify transfer constraints and likely transmission enhancements to resolve the identified constraints. The Participating Transmission Providers will also provide approximate costs and timelines associated with the identified transmission enhancements to facilitate the stakeholders’ determination of whether they have sufficient interest to pursue a Step 2 evaluation. Once a Step 1 evaluation has been completed for a particular transfer, the stakeholders have the option to request a Step 2 evaluation for that transfer to be performed during the subsequent year’s Inter-Regional Participation Process Cycle. If the stakeholders opt to not pursue Step 2 evaluation for the requested transfer during the subsequent year’s Inter-Regional Participation Process Cycle, an Economic Planning Study of that request may be re-evaluated in the future by being submitted for a new Step 1 evaluation. In the event that the stakeholders request a Step 2 evaluation, the Participating Transmission Providers will then perform additional analysis, which may include additional coordination with external processes. The Participating Transmission Providers will then develop detailed cost estimates and timelines associated with the final transmission enhancements. The Step 2 evaluation will ensure that sufficient coordination can occur with stakeholders and among the impacted Participating Transmission Providers. In addition, the Step 2 evaluation will provide sufficient time to ensure that the inter-regional study results are meaningful and meet the needs of the stakeholders.

It is important to note that the Participating Transmission Providers expect that a Step 2 evaluation will be completed prior to interested parties requesting to sponsor transmission enhancements identified in an Economic Planning Study. However, the Participating Transmission Providers will work with stakeholders if a situation develops where interested parties attempt to sponsor projects identified in a Step 1 evaluation and there is a compelling reason (e.g. where time is of the essence).

Inter-Regional Cost Allocation:

The cost allocation for Inter-Regional Economic Upgrade projects will be determined by each region in which the construction of such upgrades (in whole or in part) would occur.

Inter-Regional Coordination of Economic Transmission Project Development:

Once an Economic Planning Study report has been finalized, multiple stakeholders may be interested in jointly participating in the project development. An Inter-Regional process addressing each such economic upgrade request will be developed that will formalize the process of determining if there is sufficient stakeholder interest to pursue

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This white paper lays out a framework for inter-regional planning to address Order 890’s regional participation principal and to otherwise provide a mechanism for the analysis of inter-regional Economic Planning Studies. The Participating Transmission Providers recognize the need to obtain stakeholder input as a part of finalizing the specifics of this process. To that end, the Participating Transmission Providers plan to engage stakeholders to receive their input concerning this framework in a variety of different forums including the following: through their Regional Planning Processes and through planned FERC Order 890 technical conferences in the fall of 2007. The goal being, that the Participating Transmission Providers’ would finalize the specifics for the Inter-Regional Participation Process by the time they file their Attachment Ks in December 2007, with the goal of implementing this process beginning in 2008. ¶

¶ The further development of this process will include defining the process and procedures whereby the Economic Planning Studies can be requested by the stakeholders and evaluated through this inter-regional process. Details that will be further developed include the following: the number of studies that would be normally supported through the planning cycle; the process of determining ... [3]

economic project development and the coordination that will be required of the impacted Transmission Providers to support this process. The Participating Transmission Providers and the stakeholders will support this process development activity beginning in 2008.

Stakeholder Participation in the Inter-Regional Participation Process:

Purpose

The purpose of the Inter-Regional Participation Process Stakeholder Group (IRPPSG) is to provide a structure to facilitate the stakeholders' participation in the Inter-Regional Participation Process.

Responsibilities

In general, the IRPPSG is responsible for working with the Participating Transmission Providers on Inter-Regional Economic Planning Study requests so as to facilitate the development of such studies that meet the goals of the stakeholders. The specific responsibilities of this group include:

1. Adherence to the intent of the FERC Standards of Conduct requirements in all discussions.
2. Develop the IRPPSG annual work plan and activity schedule.
3. Provide timely input on the annual Economic Planning Study(ies) scope elements, including the following:
 - a. Study Assumptions, Criteria and Methodology
 - b. Case Development and Technical Analysis
 - c. Problem Identification, Assessment and Development of Solutions (including proposing alternative solutions for evaluation)
 - d. Comparison and Selection of the Preferred Solution Options
 - e. Economic Planning Study Results Report.
5. Propose and select the Economic Planning Study(ies) to be evaluated (five annually).
 - a. Step 1 evaluations
 - b. Step 2 evaluations
6. Providing advice and recommendations to the Participating Transmission Providers on the Inter-Regional Participation Process.

Membership

The IRPPSG membership is open to any valid stakeholder in the IRPP. For the IRPP a valid stakeholder is defined as any Eligible Customer, state or federal agency, and any organization capable of providing Ancillary Services under one of the Participating Transmission Providers' OATTs. In addition, any Transmission Owner, Transmission Operator, or Transmission Planner as those terms or their successors are used under the NERC Functional Model, as may be amended from time to time, are eligible to be stakeholders under this IRPP. Authorized agents of the above identified stakeholder organizations will also be permitted to represent those organizations in the IRPP. Any individual wishing to become an IRPPSG member can make an application for membership on the IRPP website. On the application for IRPPSG membership, the

applicant must provide their name, their organization affiliation, and an explanation of how they meet at least one of the categories listed in the above valid stakeholder definition.

Meeting Procedures

Meeting Chair

A stakeholder elected member of the IRPPSG will chair the IRPPSG meetings and serve as a facilitator for the group by working to bring consensus within the group. In addition, the duties of the IRPPSG chair will include:

1. Developing mechanisms to solicit and obtain the input of all interested stakeholders related to inter-regional Economic Planning studies.
2. Ensuring that IRPPSG meeting notes are taken and meeting highlights are posted on the IRPP website for the information of the participants after all IRPPSG meetings.

Meetings

Meetings of the IRPPSG shall be open to all IRPPSG members interested in inter-regional Economic Planning studies across the respective service territories of the Participating Transmission Providers. There are no restrictions on the number of people attending IRPPSG meetings from any organization.

Quorum

Since IRPPSG membership is open to all valid stakeholders, there are no quorum requirements for IRPPSG meetings.

Voting

In attempting to resolve any issue, the goal is for the IRPPSG to develop consensus solutions. However, in the event consensus cannot be reached, voting will be conducted with each IRPPSG member's organization represented at the meeting (either physically present or participating via phone) receiving one vote. The IRPPSG chair will provide notices to the IRPPSG members in advance of the IRPPSG meeting that specific votes will be taken during the IRPPSG meeting. Only IRPPSG members participating in the meeting will be allowed to participate in the voting. No proxy votes will be allowed. During each IRPP cycle, the IRPPSG members will propose and select the inter-regional Economic Planning studies that will be performed during that particular IRPP cycle. The IRPPSG will annually select up to five (5) inter-regional Economic Planning studies, including both Step 1 evaluation(s) and any Step 2 evaluations, with any such Step 2 evaluations being performed for the previous years Step 1 studies for the pertinent transfers. Each organization represented by their IRPPSG members will be able to cast a single vote for up to five Economic Planning studies that their organization would like to be studied within the IRPP cycle. If needed, repeat voting will be conducted until there are clear selections for the five Economic Planning studies to be conducted.

Meeting Protocol

In the absence of specific provisions in this document, the IRPPSG shall conduct its meetings guided by the most recent edition of *Robert's Rules of Order, Newly Revised*.

Data and Information Release Protocol

IRPPSG members can request data and information that would facilitate their ability to replicate the IRPP inter-regional Economic Planning studies while ensuring that CEII and other confidential data is protected. The following outlines the process the IRPPSG members would typically use to obtain the data and information. Step 1 of this process is an optional step that may be required at the discretion of the Participating Transmission Providers. The Participating Transmission Providers will make the determination of whether this first step is required based on the Participating Transmission Providers' familiarity with the entity making the data requests. For example, an adjoining Transmission Owner would likely not be required to follow the below Step 1. Steps 2 through 4 will be required for all entities requesting the data and information.

1. Request and obtain from FERC the FERC Form No. 715 data (that includes CEII data) for the Duke Energy Carolinas, Entergy, EON, Progress Energy Carolinas, South Carolina Electric & Gas, and Southern Companies. This request must be submitted each year subject to Participating Transmission Providers determination.
2. Have a current SERC Confidentiality Agreement in place.
3. Have a current IRPP Confidentiality Agreement in place.
4. Formally request the data on the IRPP website with attestations that they have fulfilled the above 3 steps.

The IRPP Participating Transmission Providers will process the above requests, approve/deny the request, and if approved, provide the data to the IRPPSG member.

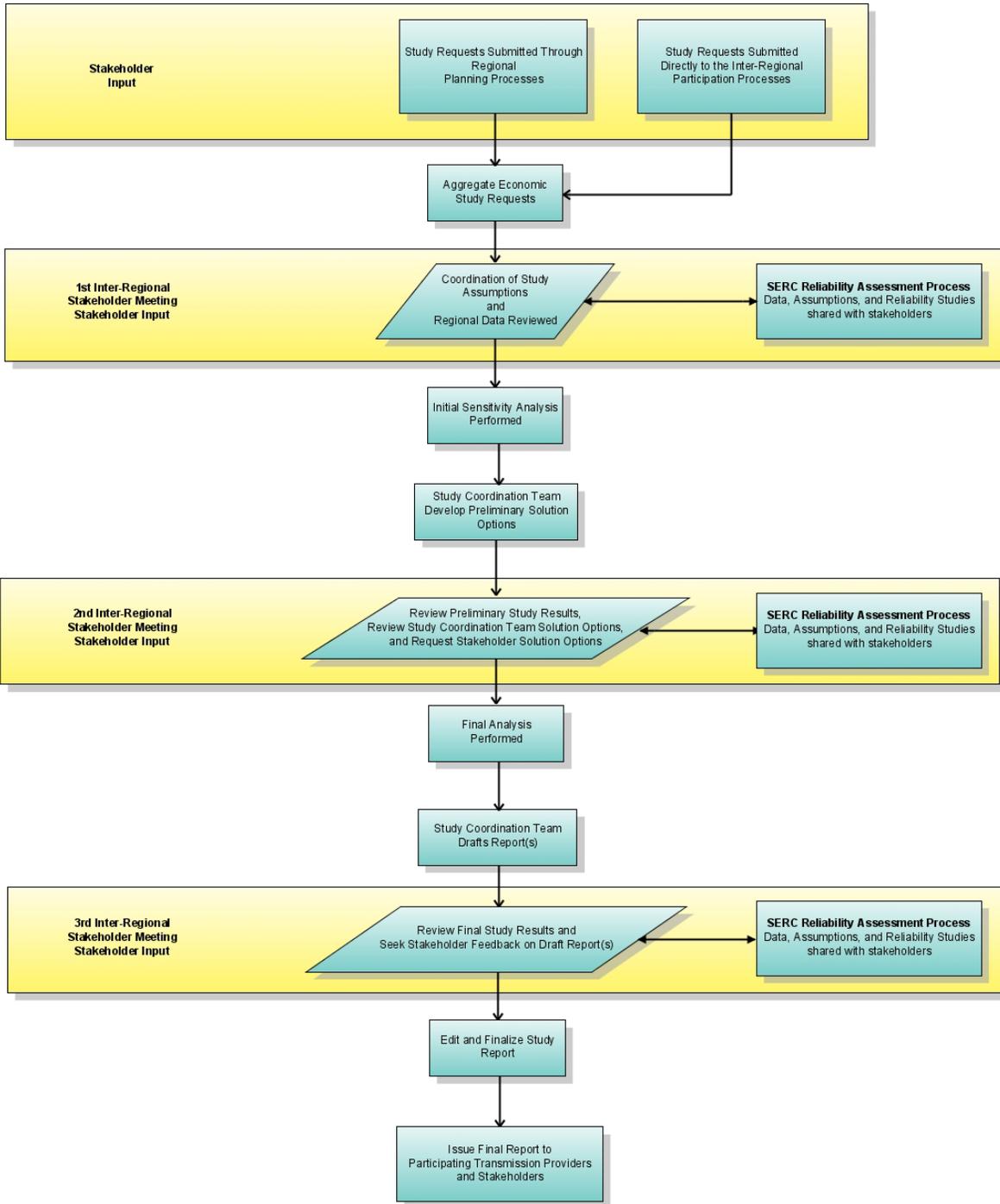
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Inter-Regional Participation Process Diagram:

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and to satisfy the regional participation principle established in FERC Order 890.

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The further development of this process will include defining the process and procedures whereby the Economic Planning Studies can be requested by the stakeholders and evaluated through this inter-regional process. Details that will be further developed include the following: the number of studies that would be normally supported through the planning cycle; the process of determining how the requested studies would be prioritized; and the potential for performing additional studies if paid for by particular stakeholders. The stakeholders will have an opportunity to interact with the Participating Transmission Providers' in the development of these details.