



NTTG Order 1000 Stakeholder Comment and Input Form				NTTG Response			
Your input on Northern Tier's processes are important to us. Please submit comments to info @ nttg.biz				All responses are dynamic and based upon assumptions that may be adjusted as options are fleshed out and alternatives considered; Unless otherwise indicated, responses are subject to change.			
<u>Received via info @ nttg on September 3, 2012</u> <u>September 5, 2012: Assigned Jointly to the Planning and Cost Allocation Compliance Workgroups</u>				NTTG Tracking Info			
Commenter Contact Information Date: August 31, 2012 Name: Fred Heutte NWEC Organization: on behalf of Renewable Northwest Project, NW Energy Coalition and American Wind Energy Association				Date Received: September 3, 2012 @ 11:46PM Committee Assignment: NTTG Planning and Cost Allocation Compliance Workgroups Date Assigned: September 5, 2012			
Comments				DRAFT RESPONSE			
Source Document	Page / ¶	Comment		ID#	Title	Response Date	Draft Response
		<i>References are to items in our comment letter dated August 31, 2012</i>					
	1	We are interested in whether NTTG will pursue conditional acceptance of Order 1000 compliance filings due in October 2012.	68	AWEA, NWEC, RNP #1	9.12.12		NTTG's jurisdictional transmission providers will not request conditional acceptance of their compliance filings. NTTG has developed benefit metrics in compliance with Order No. 1000. Separately, NTTG continues to evaluate additional modeling capabilities in an effort to define benefit metrics by beneficiary and will report on those modeling capabilities at a future stakeholder meeting."
	2a	We suggest that NTTG reconsider the structure of the Cost Allocation Committee to allow for stakeholder involvement.	69	AWEA, NWEC, RNP #2	9.12.12		The structure and practices of the Cost Allocation Committee provides for stakeholder input and is compliant with Order 1000. NTTG has and will continue to provide meaningful opportunities for stakeholder involvement in NTTG's processes. Please refer to the Draft NTTG Regional Planning and Cost Allocation Practices, dated 09/12/12, Section 2.4, for a summary of opportunities for stakeholder involvement.
	2b	We recommend that NTTG revisit expanding the membership of the Planning Committee to the full array of stakeholders beyond the existing three classes.	70	AWEA, NWEC, RNP #3	9.13.12		The structure and practices of the Planning Committee provides for stakeholder input and is compliant with Order 1000. NTTG has and will continue to provide meaningful opportunities for stakeholder involvement in NTTG's processes. Please refer to the Draft NTTG Regional Planning and Cost Allocation Practices, dated 09/12/12, Section 2.4, for a summary of opportunities for stakeholder involvement.
	3	We highlight the importance of having project sponsors and stakeholders officially involved in the scenario development process.	72	AWEA, NWEC, RNP #4	9.12.12		NTTG agrees with the importance of stakeholder and project sponsor input in the development of allocation scenarios. Please refer to the Q2 activities summarized in the Draft NTTG Regional Planning and Cost Allocation Practices, dated 09/12/12, Section 2.4.
	4	With respect to the cost allocation metrics that are currently under development (deferred investment, change in peak load losses and energy losses, etc.), we look forward to seeing their application to existing or "conceptual" transmission lines.	73	AWEA, NWEC, RNP #5	9.12.12		NTTG appreciates this suggestion. The conceptual application of these metrics will be discussed during the September 18, 2012, NTTG Order 1000 stakeholder meeting.

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	5	We are concerned about Section 3.2.3, "Reporting Requirement for a Project Selected for Cost Allocation in Prior Biennial Cycle."	74	AWEA, NWEC, RNP #6	9.12.12	NTTG has modified this section since last shared with stakeholders during the August 1, 2012 stakeholder meeting. Please refer to the Draft NTTG Regional Planning and Cost Allocation Practice, dated 09/12/12, especially Sections 3.9 and 3.10, for the revised requirements.
	5a	Based on our current understanding of the proposal, we feel it is necessary to express concern that this process seems vague and open to abuse.	75	AWEA, NWEC, RNP #7		
	5b	Is it accurate that only projects selected for cost allocation are subject to being removed from the transmission plan because of regulatory delays? If so, why?	76	AWEA, NWEC, RNP #8		
	5c	We recommend improved language for this section in our letter.	77	AWEA, NWEC, RNP #9		
	6	We appreciate and support the recognition that new "unsponsored" regional projects may be identified through the regional planning process if they meet the identified transmission needs more efficiently and cost effectively (Section 3.1(d)).	78	AWEA, NWEC, RNP #10	9.13.12	The objective of NTTG's transmission study effort is to develop an optimized Regional Transmission Plan that more efficiently and/or cost effectively meets the regional transmission needs than the alternatives
	7	We appreciate and support that public policy requirements will not be considered separately from other transmission needs, but evaluated holistically along with other regional projects.	79	AWEA, NWEC, RNP #11	9.13.12	As stated in response 6 above, NTTG's objective is to develop an optimized plan. In order to obtain this, the public policy projects will be evaluated in the same manner as other projects.
	7	We specifically commend NTTG for the provision encompassing "public policy objectives," defined as "public policy requirements that are driven by state or federal law or regulations and potential future public policy objectives."	80	AWEA, NWEC, RNP #12	9.13.12	As described in Section 3.1 of the Planning and Cost Allocation Practice, NTTG may undertake additional studies of strategic initiatives such as public policy objectives for informational purposes. These additional studies may be proposed to the Planning Committee for incorporation into the Biennial Study Plan with final approval by the Steering Committee.
	8	We continue to be concerned about the revised requirement that non-Planning Committee members may submit economic study requests only if they execute an Economic Study Request Agreement	81	AWEA, NWEC, RNP #13	9.13.12	The requirements of the Economic Study Request Agreement are not overly burdensome and provide for an agreed upon understanding of the obligations and responsibilities of the study requestor and NTTG. The two economic studies provided without charge per planning cycle and the existing OATT Attachment K contains this very provision to charge requestors for additional studies and has been approved by the FERC. Additionally, NTTG has been able to satisfy all NTTG regional economic study requests with the existing processes.
	9	We commend NTTG for the clear discussion in Section 5.4.1 concerning the Order 1000 requirement to select the most efficient and cost effective plan.	82	AWEA, NWEC, RNP #14	9.13.12	The Planning and Cost Allocation Practice reflects our experience at this time. To ensure the process results in the identification of the most efficient and/or cost effective regional plan, the processes and metrics may be modified in the future, with stakeholder input, as new understanding, methods, tools, and techniques are developed.