



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 18, 2012</u>							
<u>September 19, 2012: Assigned Jointly to the Planning and Cost Allocation Compliance Workgroup</u>				NTTG Tracking Info			
<b>Commenter Contact Information</b> Date: September 18, 2012 Name: Vicki M. Baldwin Organization: UIEC				Date Received: September 18, 2012 @ 4:37 PM Committee Assignment: NTTG Joint Planning and Cost Allocation Compliance Workgroup Date Assigned: September 19, 2012			
Comments				DRAFT RESPONSE			
Source Document	Page / ¶	Comment		ID#	Title	Response Date	Draft Response
Attachment K	Section 3.3.2 Q1	<p>We believe that, as written, the information requirements for both planning and for cost allocation are too generic and will not obtain information with sufficient granularity to enable NTTG staff to perform their analysis. Also, as written, it appears likely that most all projects will be identified as reliability projects. That is because reliability projects are the most difficult for others to challenge and when the project sponsor looks for cost recovery, having a reliability cost allocation will serve the easiest way for the project sponsor to get most certain cost recovery. That, however, defeats the purpose of FERC Order 1000. Therefore, we suggest that the information requirements be enhanced. Getting more detailed information up front will also help the NTTG staff in their evaluations.</p> <p>We suggest that at a minimum, the following be added: (1) At 3.3.2 (c) we suggest you also ask for information that addresses any projects whose goal is to reduce costs. And then, rather than just a statement of whether the project meets a particular need, that you also require that the project sponsor explain what the particular need is, how specifically this project meets that particular need, what percentage of the project meets that particular need, who benefits from this particular solution to the need, how the identified beneficiaries benefit, and how much benefit the project sponsor believes each beneficiary receives as a result of this particular project;</p>		83	UIEC #29	10.19.12	The project information data in Attachment K and the NTTG Planning and Cost Allocation Practice Document identifies and provides for the basic modeling data to be included in NTTG's power system planning models; NTTG believes that this data provides sufficient details to allow them to work with the project sponsor and assess the effectiveness of the proposed project.

Comments			DRAFT RESPONSE			
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Attachment K	Section 3.3.2 Q1	<p>(2) At 3.3.2(e) we suggest you expand this requirement similarly by asking the project sponsor to provide an explanation or identification of the particular public policy, what percentage of the project meets this particular public policy, how this particular project meets that particular public policy requirement, who benefits from this particular solution to the public policy identified, how the entities or entity identified benefit, and how much benefit the project sponsor believes each beneficiary receives as a result of this particular project; and</p> <p>(3) At 3.3.2(a)(a) we similarly believe these additional information requirements need to be expanded so that the requirements are expanded to reduce costs and to access remote generation and then the information provided should include identification of the specific requirement, what percentage of the project is to meet that particular requirement and what other requirements it might meet and their percentages, an explanation of how specifically this particular project meets the cited requirement, who the beneficiaries are, and the project sponsor's best estimate of how much each beneficiary benefits and how that was derived. Then when you ask for studies, studies to support all this information should be provided. If these additional information requirements are added to Attachment K as we recommend, then similar updates will need to be made to Section 4.0 of the "NTTG Regional Planning and Cost Allocation Practice" document.</p>				
Attachment K	Section 3.7.1.1	Why are the Open Season Solicitation of Interest projects limited to those for reliability and/or economic projects? Won't there ever be a case in which a public policy project might be put out for open season?	84	UIEC #30	10.19.12	On October 11, 2012, NTTG's Jurisdictional Transmission Owners each submitted a filing to the FERC containing revised Attachment K's to comply with Order 1000. The filed versions included revisions in section 3.7.1.1 such that any project identified in the NTTG Regional Transmission Plan in which a Transmission Provider is a project sponsor, the Transmission Provider may elect to provide an "open season" solicitation of interest to secure additional project participants.