

NTTG 2016-2017 Draft Study Plan Stakeholder Comments and NTTG Response

Commenter Contact Information			NTTG Tracking Information		
Date: May 20, 2016			Date Received: May 23, 2016		
Name: PacifiCorp Transmission			Committee Assignment: Planning & Cost Allocation Committees		
Organization: PacifiCorp Transmission					
Comments			NTTG Responses		
Draft Study Plan Section	Page/Line #	Comment	ID#	Response Date	Response & Incorporated Changes (if any) (Section, Page, Table, etc.)
IV.A.1.b	Pg. 4/Tbl 2	Idaho – does the total include the UAMPS resources? Utah- what makes up the total? Wyoming- may want to itemize 887 wind, 13.87 misc. and -337 coal retirement	1.	5/30/2016	The Idaho resources include the UAMPS resources. The Utah resources include 645 MW Lakeside unit II, the Carbon 173 MW retirement, 2 MW of miscellaneous DG, 300 MW of solar and 123 MW of other Network Resources.
IV.A.4	Pg. 12	PAC 2015 IRP Update shows an Oregon RPS of 27% by 2025	2.	5/30/2016	RPS Table and Attachment 1 have been updated to reflect the revised requirement. Please see RPS Table .
IV.B.3	Pg. 15	An explanation of the NULL case should be included in this section	3.	5/30/2016	Thanks for the comment. A better description of the null case will be included. Please see Null Case .
IV.C.1	Pg. 18	The table shows Gateway C, is this intended to be Gateway Central? This project is mostly complete except for a very small segment that PacifiCorp already owns 100% of associated ROW; and no federal permits are required.	4.	5/30/2016	The majority of the Gateway Central Project has been completed; however, the Oquirrh-Terminal lines #3 & #4 remain to be completed, ROW has been perfected, so its NTTG status is now committed. The Lines were missing from the transmission additions table, so those lines have been added and the table now shows the lines as committed. Please see Transmission Additions and Change Case tables.
IV.C.1.c	Pg. 19	Why is this section limiting the modeling tools to just using power flow? The K allows for using both power flow and production cost modeling and hence, should allow for both.	5.	5/30/2016	In prior study cycles, NTTG confidence was not sufficiently high enough to warrant using the production cost modeling results in determining the Regional Transmission Plan. This study cycle the TWG will evaluate closer if those production cost modeling results could be more reflective of likely future costs. The study plan will be updated to reflect this here .
IV.C.2	Pg. 19	This section states “projects eligible for cost allocation” should this be “projects requesting cost allocation”?	6.	5/29/2016	No. The statement “projects eligible for cost allocation that are incorporated with the Draft Regional Transmission Plan” is

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					<p>correct. A project that requests cost allocation may not be eligible for cost allocation.</p> <p>To be eligible for cost allocation consideration a Project Sponsor must have met the pre-qualification requirements, submitted its data (e.g. the NTTG Cost Allocation Data Submittal Form) within the specified data submittal window, and the project must be selected into the Regional Transmission Plan for purposes of cost allocation.</p> <p>Additionally, an unsponsored project identified in the regional planning process or an unsponsored project proposed by a stakeholder, Transmission Provider or non-incumbent transmission developer not desiring to sponsor the project, is eligible for cost allocation if it was selected into the Draft Regional Transmission Plan and has an estimated cost exceeding \$20 million.</p>
VI	Pg. 20	Stated under introduction that the planning committee selects cost allocation projects, should it be projects that request cost allocation treatment. Per the K a project proponent determines if they want to be considered for cost allocation not the planning committee.	7.	5/29/2016	<p>The first sentence states "... which the Planning Committee selects into the Regional Transmission Plan for purposes of regional cost allocation."</p> <p>Before cost allocation can be applied, the project must first be selected into the Regional Transmission Plan for purposes of cost allocation. This means that Planning Committee through the TWG technical analysis has found that the Regional Transmission Plan with the project is a more efficient or cost effective regional plan</p>

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					than the other regional plans evaluated using the three metric (capital costs, losses and reserve margin). However, this analysis will only happen if the proponent of a project requests cost allocation, meets the pre-qualification requirements, submit its data and is selected into the Regional Transmission Plan.
VI.D	Pg. 22	If a coal retirement scenario is pursued, then the plants included and timing of retirement should be taken from members integrated resource plans, not a general guess at to the number of MW retired in an area by some arbitrary date. See proposed alternative language.	8.	5/29/2016	Thank you for your comment. The Cost Allocation Committee will consider you comment when it finalizes the Allocation Scenarios.
VI.D.	Pg. 22	Why is coal retirement being considered, this policy has not been set. If we are to consider public policy it should be policy that has been set not speculation.	9.	5/29/2016	Allocation scenarios are not limited to enacted legislation. The Cost Allocation Committee creates allocation scenarios for those parameters that likely affect the amount of total benefits of a project and their distribution among Beneficiaries. Thus, the purpose of the Allocation Scenarios is to represent potential futures of the transmission plan selected by the Planning Committee, and how robust the plan is to meet reliability needs for transmission in the alternate scenarios.

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IV	Pg. 11/Ln. 267	<p>Attachment 1 does not list the public policy requirement set forth in ORS 7575.811 (HB 2187 (2015)). Under the terms of that statute, any regional transmission planning process which includes the State of Oregon must consider the transmission of electricity derived from ocean based renewable energy generation. Ocean energy resources include both off shore wind and marine hydro-kinetic generation resources. Because consideration of offshore wind and marine hydro-kinetic resources is now a public policy requirement of the state of Oregon, ocean energy should be addressed in the NTTG Biennial Study Plan for the 2016-17 Regional Planning Cycle.</p> <p>HB 2187 has multiple purposes. The primary, and most obvious, was to ensure that long term transmission planning processes would include ocean energy resources among the generation resources being considered to meet Oregon's renewable portfolio standard. As Oregon increases its RPS requirements, Oregon's policy makers sought to ensure that non-traditional ocean energy resources would be considered on an equal basis with land based renewable generation resources from other parts of the West. While there is no specific set aside for ocean energy generation within Oregon's RPS requirements,</p>	10.	5/29/2016	<p>Thank you for your input regarding Oregon House Bill 2187 (2015) concerning ocean energy resources. NTTG will add it to the list of public policy requirements. Transmission needs driven by public requirements will be considered in the planning process as described in Attachment K. As you are aware, laws can affect transmission customer needs for transmission services, but the law itself is not a need. (Order 1000-A at P204). Also, for your information, NTTG did not receive any data submissions indicating that an ocean power generating project seeks to interconnect or indicating that a transmission need was driven by ocean power.</p>

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		<p>NTTG must consider ocean energy on an equal basis with on shore generation resources.</p> <p>An important secondary purpose of HB 2187 was to develop institutional experience in evaluating ocean energy resources within the transmission planning community in the Northwest. Oregon policy makers sought to ensure that transmission planning engineers and other experts would expand their expertise to include greater familiarity with the data sources and modeling tools specific to ocean energy resources. NREL has existing data sets specific to ocean energy resources. Oregon policy makers anticipate the institutional experience gained in evaluating ocean energy resources within the regional planning process will inform future Integrated Resource Planning and other generation expansion processes.</p> <p>Simply dismissing ocean energy generation resources as too expensive compared to onshore resources will not satisfy HB 2187; NTTG must actually incorporate ocean energy resources into its models. To the extent that existing data sets and modeling tools may prove inadequate to allow NTTG to consider ocean energy, those limitations should be fully documented in an appendix to the Plan.</p>			

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VI	Pg. 22/Ln. 548	NTTG should add an allocation scenario specific to ocean energy resources. OWET suggests adding an allocation scenario which would replace 1000 MW of onshore wind and solar with 1000 MW of a mix of offshore wind and marine hydrokinetic energy	11.	5/29/2016	Thank you for your suggestion to the Cost Allocation Committee to consider adding an ocean power scenario as an Allocation Scenario. NTTG's Cost Allocation Committee discussed the merits of your suggestion at the June 14, 2016 Cost Allocation Committee Meeting when the Committee's recommendations for Allocation Scenarios were finalized. As we discussed at that time and as reflected in the meeting notes, "There was discussion regarding the use of studying an ocean power scenario for cost allocation. There was a concern that a single scenario for ocean and wind would show benefits in the coastal area but would be zero benefit in the other scenarios which would lead to a rejection for a project being eligible for cost allocation." Following further discussion, the committee determined that "the issue was not developed enough to be included as a cost allocation scenario in the current cycle" and four cost allocation scenarios representing high load, low load, wind replaced by solar, and coal replaced by wind and solar were recommended to the Steering Committee for inclusion in the current cycle's Study Plan.
IX	Pg. 26/Ln. 699	Even though NTTG is required by state law to consider ocean energy resources in developing its plan, NTTG could also consider adding a scenario or sensitivity case to consider ocean energy resources as part of its evaluation of Public Policy Considerations	12.	5/29/2016	Thank you for your comment. The window for submitting Public Policy Considerations and alternate solutions closed on January 31, 2016.

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IV	Pg. 6/Ln. 108	Please add a short definition of "regionally significant" proposed transmission projects	13.	5/30/2016	Thanks for the comment. A footnote was added to the table .
IV	Pg. 12/Ln. 267	We concur with Oregon Wave Energy Trust in requesting that the NTTG study plan include the Oregon public policy requirement to consider the transmission of electricity derived from ocean based renewable energy generation. ORS 7575.811, HB 2187 (2015).	14.	5/29/2016	Thank you for your comment. See response above, ID#11.
IV	Pg. 12/Ln. 268	As noted in the table on p. 29, the Oregon RPS standard in 2025 is now 27%, an increase from 25%	15.	5/30/2016	The RPS Table and Attachment 1 have been updated. Please see here .
IV	Pg. 17/Ln. 422	In the text and the table, to avoid confusion with the term IRP (Integrated Resource Plan), we suggest using Initial Regional Transmission Plan (IRTP)	16.	5/30/2016	References to the "Initial Regional Plan" as "IRP" have been changed to "iRTP"
IV	Pg. 17/Ln. 422	Noting that the table is an initial proposal and may be amended, we suggest a change case including all three of the proposed interregional projects -- SWIP North, TWE and TransCanyon/Cross-Tie	17.	5/30/2016	The change case table was for illustration only, the TWG will develop it more fully once the production cost model has been run and power flow conditions have been analyzed. As the Study progresses in Quarter 3 and again in Quarter 7, TWG will discuss with the Planning Committee its set of change cases it's planning to perform. Please Change Case .
V	Pg. 20/Ln. 486	It would be helpful to add a short description of what deviations from base case assumptions are acceptable or unacceptable. To what degree does this reflect NERC or WECC planning criteria and engineering judgement.	18.	5/30/2016	These deviations generally reflect the fact that not all parallel paths are simultaneously stressed, while is not practical to have all paths at their maximum stress level simultaneously, TWG will review the selected cases for the selected paths and change the case assumptions to increase the desired path flows. Unacceptable path flows are those that exceed a particular path flow rating, if those are found, case assumptions will be altered to reduce that paths' stress level.

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VI	Pg. 22/Ln. 548	We support Oregon Wave Energy Trust's proposal to add an allocation scenario which would replace 1000 MW of onshore wind and solar with 1000 MW of a mix of offshore wind and marine hydrokinetic energy.	19.	5/29/2016	Thank you for your comment. See response above, ID# 11..
VI	Pg. 22/Ln. 555	Please briefly describe why 800 MW was chosen for the wind-to-solar replacement alternative rather than some other amount.	20.	5/29/2016	For this Allocation Scenario NTTG assumed that approximately 50% of the Quarter 1 new incremental wind of 1,628 MW shown in Figure 1, page 4, would be replaced by solar. Note that in Figure 4 the 3,000 MW decrease in new incremental wind from 2024 to 2026 reflect how the 3,000 MW of wind resources were submitted by the Power Company of Wyoming (PCW) associated with the TransWest Express Project is included in the 2024 data and not included in the 2026 data.
VI	Ph. 22/Ln. 561	It appears that the text starting at 564 and 568 are different options. We would probably prefer the second option but would like additional clarity. In general, we propose that NTTG should be running scenarios that look at coal retirement beyond what is in the current member IRPs.	21.	5/29/2016	Thank you for your comments. The Allocation Scenario starting on line 564 presumes 1,000 MW of coal units that are not retired in the 2026 case can be reduced. The Allocation Scenario starting on 568 sets the coal retirement amounts to be equal to the coal retirement retired by 2026 in the IRP.
VI	Pg. 22/Ln. 564	For the first option, would a total 1000 MW of coal retirement be represented by reducing output from each coal unit? If so how is this represented in the model - as seasonal shutdown, maintenance outage, etc.?	22.	5/29/2016	Yes. This power flow study studies a single hour that presumes that the coal units are reduced pro rata and replaced with equivalent amount of equal shares of wind and solar in the appropriate geographic locations.
VI	Pg. 22/Ln. 568	How much coal would be retired if this follows each NTTG member's IRP? For units with multiple owners, how will differences in the IRPs be addressed?	23.	5/29/2016	NTTG assumes that its TPs are providing information that is consistent with the TPs IRPs. Figure 1, page 4, shows an incremental reduction of 1,476 MW of coal by 2026. NTTG uses the incremental resource changes, including reductions to coal

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					resources, as provided by its TPs during the Q1 data submittal time period.
IX	Pg. 26/Ln. 707	We appreciate the inclusion of the NWEA/RNW requested public policy consideration study in the proposed 2016-17 study plan. We anticipate securing the services of a technical expert with substantial background in transmission planning and modeling, and would like to request either 1) their participation with the Technical Working Group during preparation and assessment of the PPC study, or 2) some other reasonable accommodation to provide our consultant meaningful access to the data, model, assumptions and any preliminary results associated with the PPC study. Appropriate arrangements for confidentiality would be made and we would like to stress that our consultant will have expertise relevant to this specific study request and the ability to meaningfully contribute to the study with minimal intrusion.	24.	6/1/2016	Thank you for the comment. Members of the TWG who perform the analysis for the biennial Plan are NTTG Planning Committee members or their designated technical representatives who have committed to participating in the entirety of the planning process, rather than a single study or phase. The TWG does not need assistance “during preparation and assessment of the PPC study”; the TWG will select a case from the Production Cost Model analysis that will have high Path 8 westbound flows and the Study Plan already specifies the criteria with which the results will be analyzed. This analysis is a natural extension of the work the TWG has already committed to do over the course of the two-year cycle. The “data, model, assumptions” are already listed in the Study Plan. The preliminary results will be identified in the Report. The TWG welcomes any participant that will commit to participate fully in the entirety of the two-year process as a Planning Committee member or their designated technical representative.

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II & III	Pg. 2	<p>Study Plan should carefully define and properly use terms that in some places appear to be used interchangeably including Initial Regional Plan, Regional Transmission Plan, Draft Transmission Plan, Draft Final Transmission Plan, etc.</p> <p>In addition, the acronym ITP is used for both the Initial Regional Plan and Interregional Transmission Projects.</p>	25.		<p>A footnote will be added to denote that throughout the planning cycle the Regional Transmission Plan will be represented by the Draft Regional Transmission Plan or Draft Final Regional Transmission Plan.</p> <p>Thank you. The document has been updated and the ITP acronym will be used for Interregional Transmission Projects and iRTP is the acronym for Initial Regional Plan</p>
IV (A)(1)(e)	Pg. 8, Above Line 131	Add a footnote for SWIP-North project in the Table that lists Interregional Projects to read "The SWIP-North project submitted by Great Basin Transmission would require a new physical connection at Robinson Summit, but also includes ~1,000 MW of capacity rights on the already in-service ON Line Project from Robinson Summit to Harry Allen 500 kV. As of 2020, upon completion of CAISO's Harry Allen to Eldorado Project, those GBT capacity rights will provide a direct CAISO connection to SWIP-North, effectively bringing CAISO to Robinson Summit. Therefore, SWIP-North (with its 1,000 MW of capacity rights to Harry Allen) was submitted as an interregional project to NTTG, WestConnect and CAISO."	26.	5/30/2016	<p>A footnote will be added to reflect the use of transmission rights beyond the southern terminal of the SWIP North Project. Please see here.</p>

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IV (A)(4)	Pg. 12, Between lines 268 and 269	<p>Comments for the RPS table: As described by PacifiCorp in Attachment 1, the Oregon RPS has been increased under SB-1547-B to 27% in 2025.</p> <p>In California, SB 350 was signed into law by Governor Brown in October 2015, increasing the RPS to 40% in 2024, 45% in 2027, and 50% in 2030. It is anticipated that the California utilities will meet 45% prior to the end of 2027, so for this 10 year regional plan NTTG should assume 45% in California, with at least 1500 MW of wind generation in Wyoming.</p>	27.	5/30/2016	Thank you for the comment, the RPS Table and Attachment 1 have been updated. Please see here .
IV (C)(1)	Pg. 17, Lines 419-422	<p>1) Study for the Alternative projects should not just be reliability, but economic and policy benefits of these projects should also be evaluated to ensure all benefits of the Alternatives are fully quantified.</p> <p>2) Since the Interregional Projects will be treated under the Regional Plan as Change Cases, the ITP Evaluation Process Plan should be incorporated into this Study Plan after undergoing stakeholder input.</p>	28.	5/30/2016	<p>The foundation of a Regional Plan is that the reliability of the region must be maintained. A Regional Plan that does not perform reliably is an unacceptable plan. Once reliability has been evaluated, Alternative projects that are more efficient or cost effective will be compared. There are two phases to this analysis, one reviewing any benefits to the region that might cause the Alternative project to be selected into the Draft Regional Plan and a second reviewing the benefits that might accrue to other regions.</p> <p>The ITP evaluation plans for those projects where NTTG is a Relevant Planning Region will be attached as an Appendix to the NTTG Study Plan. The Interregional Transmission Projects Evaluation Process Plans are intended to reflect the agreement</p>

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					of the Relevant Planning Regions on a common framework for each region's evaluation of the ITP (e.g. basic description, key participants, major assumptions, and schedule for evaluation) within its respective regional planning process
IV (C)(1)	Pg. 18, Above Line 423	<ol style="list-style-type: none"> 1) Please provide a clear description of each of the projects listed in the Table. 2) We recommend that a case with SWIP North and Gateway West be studied, with 3000 MW of WY wind to be dispatched to California 3) We recommend that for SWIP North only case 1500 MW of WY wind be dispatched, and coal retirements be modelled 	29.	5/30/2016	<p>Thanks for your comment 1), good suggestion. Please see here.</p> <p>The change Case table is for illustrative purposes, and will be updated once the production cost model results have been run and a better understanding of the flow patterns is made. It is likely that SWIP North and Gateway West will be studied together, but there may be other flow patterns that might suggest this combination might not perform as well as others. It is impractical to run all combinations of projects and all flow patterns, so TWG must use its professional judgement. Which change case is run on which flow pattern will be resolved in Quarter 3 and Quarter 7. TWG will update the Planning Committee with the status of this change case table as the study progresses.</p> <p>TWG will have to review the assumptions in comment 3), a coal retirement/wind replacement scenario may not perform as well as others for SWIP North. Once the production cost model flows are better understood, other resource replacement scenarios may be better.</p>

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VI	Pgs. 20-21, Lines 510-512	Resubmittal of project qualification data in each succeeding cycle as referenced under this Section is not consistent with tariff language in Attachment K.	30.	06/01/16	<p>The language in the study plan is consistent with the tariff language in Attachment K.</p> <p>The “Pre-qualify for Cost Allocation” section of each Transmission Providers Attachment K states that a Nonincumbent Transmission Developer and an Incumbent Transmission Developer that intends to submit its project for cost allocation, must be pre-qualified by the Planning Committee and remain qualified to be considered a Sponsored Project in subsequent Regional Transmission Plans. For the project to continue to be considered a Sponsored Project in the next Regional Transmission Plan, the Project Sponsor must continue to comply with the prequalification requirements (e.g. by submitting sponsor qualification data by October 31st of Quarter 8 of the prior Regional Planning Cycle).</p>
Attachment 2	Pgs. 32-33	1) Additional milestones with respect to Interregional project review should be added between Jun 14, 2016 and Feb 23, 2017. We suggest that NTTG include updates on Interregional transmission review process at regularly scheduled Regional Planning meetings. These updates will allow opportunities for more interaction with the stakeholders to provide input as the studies evolve.	31.	06/01/16	1) Updates on the development of the NTTG Regional Transmission Plan, including the assessment of both regional and interregional projects to develop the most cost effective or efficient plan, will occur at the regularly scheduled NTTG Planning Committee and Stakeholder meetings. These meetings are public meetings and stakeholder participation is encouraged.

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		2) The ITP Evaluation Process Plan should be incorporated into this Study Plan after undergoing stakeholder input.			2) The ITP evaluation plans for the three projects where NTTG is a Relevant Planning Region will be attached as an Appendix to the NTTG Study Plan.