

# **ATTACHMENT K**

## **Transmission Planning Process**

### **I. INTRODUCTION**

SCE&G has a history of cooperative and coordinated planning with our customers for services provided to those customers. SCE&G also has a history of transmission reliability planning with neighboring utilities.

The local transmission planning process refers to the process that SCE&G performs for its individual retail distribution service territory pursuant to Order No. 890. SCE&G annually prepares a local transmission expansion plan for its own area, which is developed through an open and non-discriminatory process, to meet the needs of all customers (Native Load, Network Service, Long-term Point-to-Point Service and Generator Interconnection Service). These local planning activities include long-standing coordinated assessment processes that include all transmission providers of interconnected systems by sharing local transmission expansion plans to determine if they are simultaneously feasible, to ensure the most efficient or cost-effective alternatives for needed transmission expansion are considered and to ensure that consistent assumptions and data are used in identifying system enhancements required to meet reliability standards.

In 2007, in accordance with Order No. 890's nine planning principles, SCE&G expanded its transmission planning process in order to promote a more open, transparent and coordinated approach to transmission planning in South Carolina on a local level and on a regional level. As an addition to the planning process, SCE&G established with The South Carolina Public Service Authority (Santee Cooper), the South Carolina Regional Transmission Planning (SCRTP) process, the South Carolina Regional Stakeholder Group (SCSG), and a dedicated website for this process. This process, described more fully below, was developed in order to promote openness, transparency, comparability and the exchange of information consistent with the principles expressed in Order No. 890, thereby reducing the potential for and the false perception of undue discrimination in the planning process. Pursuant to Order No. 890, SCE&G also participates in the Southeast Inter-Regional Participation Process. The elements of SCE&G's current planning process address the nine planning principles that the Commission articulated in Order No. 890.

While not displacing or impeding local planning, Order No. 1000 built upon Order No. 890's nine planning principles to require more formalized transmission planning within regions. To comply with the requirements of Order No. 1000, SCE&G and Santee Cooper together will produce a regional transmission plan, which includes the regional transmission projects that have been selected for purposes of cost allocation. Those projects selected in the plan for purposes of cost allocation must have been determined to be more cost effective or efficient than those projects identified in SCE&G and Santee Cooper's individual local transmission expansion plans. SCE&G and Santee Cooper will serve as the Transmission Providers of the region, and will utilize the SCRTP structure, including the SCSG meetings and the SCRTP website, as the mechanism for communicating with

Stakeholders in the regional planning process.<sup>1</sup> Consistent with Order No. 1000, the Transmission Providers may continue to meet their reliability needs or service obligations by choosing to build new transmission facilities that are located solely within their individual Balancing Areas or footprints and that are not submitted for regional cost allocation.

In accordance with Order No. 1000's interregional coordination requirements, the enrolled Transmission Providers within the SCRTP coordinate with the public utility transmission providers in the Southeastern Regional Transmission Planning Process ("SERTP") to address transmission planning coordination issues related to interregional transmission facilities. The interregional transmission coordination procedures are hereby provided in Appendix K-6 with additional materials provided on the SCRTP Regional Planning website.

## II. DEFINITIONS

- A. Developer: A "sponsor" and a "developer" (hereinafter "Developer") of a transmission project proposed for selection in the regional plan for purposes of cost allocation refers to the same entity: one that proposes and commits to developing, constructing, owning, operating and maintaining the proposed facilities.
- B. Local Project: A transmission facility located solely within one Transmission Provider's footprint.
- C. Non-Incumbent Developer: An entity that seeks to develop, is developing, or has developed a Regional Project within the SCRTP footprint that is not also an enrolled Transmission Provider.
- D. Merchant Transmission Developer: An entity that seeks to develop, is developing, or has developed a transmission project within the SCRTP footprint for which cost recovery is not sought pursuant to this Tariff.
- E. Public Policy Requirement: A requirement that is stated in state, federal, or local law or regulation (including order of a state, federal, or local agency).
- F. Qualified Developer: A Developer that has been selected as eligible to propose a regional project for consideration in the regional transmission plan for purposes of cost allocation pursuant to the criteria of Section VII.B.
- G. Regional Project: A project selected by the SCRTP pursuant to the SCRTP process for inclusion in the regional transmission plan for purposes of regional cost allocation because it is a more efficient or cost-effective solution to meet a regional transmission

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<sup>1</sup> All future references to "the Transmission Providers" mean SCE&G and Santee Cooper, serving as transmission providers of the SCRTP region.

need than solutions identified in local transmission planning processes. A Regional Project is a project whose costs are allocated pursuant to Section VII.J.

### **III. SCRTP STRUCTURE AND PROCESS**

#### **A. Overview**

The SCRTP process was established pursuant to Order No. 890 in order to provide for the exchange of information and open communication, through public input by its SCSG members consistent with the expectations for open, transparent, comparable and coordinated regional planning as articulated by the FERC in Order No. 890. The SCRTP process also will be used for the Order No. 1000 regional planning process, providing Qualified Developers an opportunity to submit regional transmission solutions and SCSG members an opportunity to provide input on the Transmission Providers' consideration of such proposals. SCE&G and Santee Cooper established a dedicated website ("SCRTP website") ([www.scrtp.com](http://www.scrtp.com)) for the SCRTP process. A link to this website is available via SCE&G and Santee Cooper's OASIS. This website will be utilized to provide information regarding SCE&G's planning processes.

#### Local Planning:

The SCRTP process provides interested entities an opportunity via the SCSG meetings and the SCRTP website to understand and provide input, comments and questions regarding the study process prior to formulation of the local plan. The SCSG meeting process allows for the exchange of information and input into the planning process on a comparable basis and thereby eliminates the potential for undue discrimination.

To promote transparency and enable Stakeholders to replicate the result of the Transmission Provider's planning studies and thereby reduce the incidence of after-the-fact disputes regarding whether transmission planning has been conducted in an unduly discriminatory fashion, SCE&G will make available, during the relevant SCSG meetings and/or on the SCRTP website, information concerning the basic methodology, criteria, and process the Transmission Provider uses to develop its plan. Information will be placed on the SCRTP website, with some information being placed under the restricted access section and available to those entities who are eligible to receive CEII information.

#### Regional Planning:

The SCRTP Process also provides Qualified Developers an opportunity to propose and Stakeholders the opportunity to review regional transmission solutions for inclusion in the regional plan for purposes of cost allocation. This process establishes a transparent and non-discriminatory process for Stakeholder involvement in the regional planning process, including access to models and data used in the transmission planning process.

## **B. Participating in SCRTP Process**

The Transmission Providers will host a series of local and regional SCSG meetings to provide a forum for open and transparent transmission planning for SCE&G's local and regional planning. Any individual or entity may attend these meetings, participate in the process, and consider joining the SCSG.

Stakeholder membership in the SCSG for both local and regional SCRTP processes, is divided into the following 8 sectors:

- Transmission Owners/Operators/Developers
- Transmission Service Customers
- Cooperatives
- Municipals
- Marketers
- Generation Owners/Developers
- ISO/RTO
- State Regulatory Representatives (non-voting)

While any entity may participate in the SCRTP process, only Developers qualified pursuant to Section VII.B. may propose regional transmission solutions to be considered in the regional transmission plan for purposes of cost allocation. Merchant transmission developers are not required to participate in the SCRTP process, but are required to provide information to the Transmission Providers in accordance with Section VII.B.3.

In order to enroll as a Transmission Provider in the transmission planning region, an entity must have an open access transmission tariff (OATT) on file with FERC and must be registered with NERC as a Planning Authority and a Transmission Service Provider within the regional footprint. SCE&G and Santee Cooper are collectively the Transmission Providers in the SCRTP region.

Participants in the SCRTP process will be responsible for their own costs of participation.

## **C. SCSG Procedural Aspects**

- SCSG meetings are open to non-SCSG members.
- SCSG members determine their sector affiliation; participants must provide information to validate their sector affiliation.
- SCSG members will provide input regarding proposed regional solutions submitted for purposes of cost allocation.

- Each sector within the SCSG has two voting members (14 total voting members).
- One vote per member; majority rule.
- Voting members will be determined on a biennial basis (on even numbered years) by the sector membership, and no more than one voting member may be selected from any entity.
- SCSG can vote to change the number and timing of meetings with agreement by SCE&G, but changes must support the model development process and planning cycle.

#### **D. Protection of CEII**

Publicly available information disclosed at the SCSG meetings also will be made available on the SCRTP website. Information that is CEII only will be made available on the website to Stakeholders who meet SCE&G's eligibility requirements. These requirements are posted on SCE&G's OASIS Home Page in its Rules, Standards, and Practices. These requirements may be updated and/or revised pursuant to SCE&G's posted process for updating its Rules, Standards, and Practices. SCE&G classifies information as CEII based upon the FERC's most current definition of CEII.

SCE&G will utilize the CEII application and non-disclosure agreement posted on the SCRTP website. This protection of CEII applies to both local and regional planning.

#### **E. SCSG Meetings**

SCE&G and Santee Cooper arrange and host the SCSG meetings at locations within their service territories. These meetings will serve as the vehicle to allow for the exchange of information between SCE&G and its Stakeholders. Notification of and a schedule of these meetings will be posted on the SCRTP website. An open email distribution list will be maintained by SCE&G and Santee Cooper to email notices of meetings and other planning-related communications.

The schedule for the SCSG meetings tracks the planning process timeline to allow SCE&G to communicate information to its Stakeholders at each stage of the local planning process and allow Stakeholders to participate not only by the exchange of information but also allow Stakeholder input at relevant points of the planning process. This will allow Stakeholder input at the beginning stage when the current local plan is reviewed, regional solutions are proposed, and new issues are identified to be modeled and studied as the planning cycle starts over. Stakeholders are then updated at various times during the year regarding the studies and they are afforded the opportunity to ask questions about the studies, offer input and request additional studies. The number of meetings per year when information on the local planning process and the local transmission expansion plan will be presented and discussed are subject to change by decision of the SCSG and SCE&G over time. Any revision to

this schedule must support existing planning activities in model development and system analyses.

The schedule for the SCSG meetings when information on the regional planning process and the regional plan will be presented and discussed tracks a two year planning cycle that the Transmission Providers use to review regional solutions proposed for inclusion in the regional plan for purposes of cost allocation. This two year cycle provides sufficient time for Developers to review the Transmission Providers' local plans and to propose alternative solutions, and for Stakeholders to review and comment on these proposals. Finally, this two year cycle permits the Transmission Providers adequate time to effectively review the proposals and the Stakeholder comment. For these reasons, the Transmission Providers will decide on any changes to the SCSG regional meeting schedule, with input from SCSG members.

Based on the planning timeline for local and regional planning, the Transmission Providers developed the below outline and brief description of the substance of these meetings and the information that will be communicated. A visual representation of this schedule is available in Appendix K-3 and Appendix K-4.

## **1. Local Planning Process:**

### Meeting 1 (October/November/December time frame)

- Meeting 1 is scheduled to occur prior to the initiation of SCE&G's annual Reliability Transmission Planning (RTP) studies examining system performance against NERC Standards and SCE&G Criteria. This will allow an opportunity for Stakeholder input into the study processes and the sharing and reviewing of planning-related data and analyses before studies are actually conducted and will ensure that up-to-date information is modeled and included in the reliability study processes.
- SCE&G will review and discuss with Stakeholders the key assumptions and data used for internal model development in the RTP process.
- Stakeholders will provide input on key assumptions and modeling data used in the RTP process, including but not limited to: (a) Network Customers' Network Load Forecasts, in the form of a 10-year summer and a 10-year winter load forecast starting with the next summer period, and Network Resources Forecasts, in the form of identified resources for the next 10 years; and (b) Point-to-Point Customers' forecasts, in the form of identified customer expectations over the next 10 years. Stakeholders also will provide any updates to the

information submitted in the customer's application for service. This information shall be provided by October 31 of each year and may be submitted by email or in hardcopy form to SCE&G. Information received will be subject to protection for confidentiality.

- A schedule for completion of RTP studies will be established.
- SCE&G will review all major projects included in its current transmission expansion plan.
- Stakeholders have the opportunity to discuss and provide comments on the current transmission expansion plans in order to provide input and feedback for the development of the next plan.

#### Meeting 2 (January/February/March time frame)

- Stakeholders will identify and request economic power transfer sensitivities to be studied as part of the Economic Transmission Planning (ETP) Studies.
- Up to five sensitivities will be studied per year. If more than five are requested, Stakeholders will vote to select which sensitivities will be studied.<sup>2</sup> See Section V for additional information.
- Stakeholders may identify local transmission needs driven by Public Policy Requirements. These potential needs must be submitted for SCE&G's evaluation by March 31 each year. See Section VI for additional information.

#### Meeting 3 (May/June timeframe)

SCE&G will review:

- the initial study results (for Stakeholder input) and final study results (including Stakeholder input) of its RTP studies, which include studies conducted to measure the performance of the SCE&G transmission system against the applicable NERC Reliability Standards and the SCE&G Internal Transmission Planning Criteria. This review may occur by web conference or conference call, if needed, to maintain study schedules.

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<sup>2</sup> Sensitivities that are not selected by the stakeholder group as one of the five studied sensitivities will be studied only if the requestor(s) pays for the additional study efforts.

Stakeholders will have the opportunity to provide comments and feedback on these results. All comments and feedback will be considered in the ongoing and perpetual planning process;

- two-party and multi-party RTP studies conducted with interconnected and other Eastern Interconnection transmission owners, which include studies conducted with other transmission owners. This review may occur by web conference or conference call, if needed, to maintain study schedules. Stakeholders will have the opportunity to provide comments and feedback on these results. All comments and feedback will be considered in the ongoing and perpetual planning process;
- the most recent regional and interregional reliability assessment studies. This review may occur by web conference or conference call, if needed, to maintain study schedules;
- any upgrades being considered. Stakeholders can discuss possible alternatives to the proposed upgrades. These alternatives may be in the form of other transmission expansion solutions, generation solutions, load-management solutions, etc. Viable alternative solutions to proposed upgrades will be considered in the ongoing and perpetual planning process; and
- information on how to acquire all data used to conduct the studies, such as, base cases, reports and criteria. All data released will be subject to Non-disclosure and Confidentiality agreements, as necessary.

#### Meeting 4 (July/August/September time frame)

- SCE&G will review, discuss and receive input from the SCSG on results of requested economic power transfer sensitivities conducted by SCE&G individually, regionally with Santee Cooper and, when requested, the Interregional Participation Process, including:
  - Impacted facilities
  - Solution options
  - Cost and time estimates
- SCE&G will review and explain to the SCSG and meeting attendees information on how to acquire all data and study assumptions used to conduct the power transfer sensitivity



studies. All data released will be subject to Non-disclosure and Confidentiality agreements, as necessary.

- SCE&G will present the transmission needs driven by Public Policy Requirements for which solutions will be evaluated.

**FOR LOCAL PUBLIC POLICY ONLY:**

Meeting 5 (October/November/December time frame)

- No meeting will occur

Meeting 6 (January/February/March time frame)

- Stakeholders may submit solutions to identified transmission needs driven by Public Policy Requirements. See Section V for additional information.

Meeting 7 (May/June time frame)

- Stakeholders may submit comments on local solutions proposed to meet transmission needs driven by Public Policy Requirements. Comments must be submitted 30 days after Meeting 7. SCE&G will post all comments on the SCRTP website.

Meeting 8 (July/August/September time frame)

- SCE&G announces local solutions for transmission needs driven by Public Policy Requirements.

**2. Regional Planning Process:**

Meeting 1 (October/November/December time frame)

- No Regional Meeting will occur during the Meeting 1 time frame unless unexpected issues arise.
- This time period is reserved to permit Developers time to review the Transmission Providers' local transmission expansion plans, which are published in the preceding May or June of each year.

Meeting 2 (January/February/March time frame)

- Developers may submit proposals for regional projects to be evaluated for inclusion in the regional plan for purposes of cost allocation. The deadline for submitting proposals each year is January 15. See Section VII.C. for additional information.

These proposals may include transmission or non-transmission alternatives.

- Entities may identify regional transmission needs driven by Public Policy Requirements. These potential needs must be submitted for SCE&G's evaluation by March 31 each year. See Section VII.D for additional information.

#### Meeting 3 (May/June time frame)

- No Regional Meeting will occur during the Meeting 3 time frame unless unexpected issues arise.
- This time period is reserved to permit Stakeholders time to evaluate proposals submitted by Developers.

#### Meeting 4 (July/August/September time frame)

- Stakeholders may submit comments on all regional solutions proposed to be included in the regional plan for purposes of cost allocation. Comments must be submitted seven days prior to Meeting 4. The Transmission Provider will post all comments on the SCRTP website prior to Meeting 4.

#### Meeting 5 (October/November/December time frame)

- No Regional Meeting will occur during the Meeting 5 time frame unless unexpected issues arise.
- This time period is reserved to permit Transmission Providers time to evaluate proposals submitted by Developers and Stakeholder comment.

#### Meeting 6 (January/February/March time frame)

- Qualified Developers may submit potential regional solutions to transmission needs driven by Public Policy Requirements. Qualified Developers may only submit proposals for transmission needs that SCE&G has determined require solutions. See Section VII.D. for additional information. The Transmission Providers will post all project submissions on the SCRTP website.

#### Meeting 7 (May/June timeframe)

- The Transmission Providers will announce which regional projects have been selected in the regional plan for purposes of cost allocation.

- The Transmission Providers will produce their current local transmission expansion plans.

Meeting 8 (July/August/September timeframe)

- The Transmission Providers announce regional solutions for transmission needs driven by Public Policy Requirements.

#### **IV. LOCAL TRANSMISSION PLANNING**

Transmission planning appropriately begins at the individual transmission system ("system") level. At the system level, the SCE&G transmission planning process provides a reliable, timely and economical transmission expansion plan that on a non-discriminatory basis (1) meets SCE&G's obligation to serve native load, including native load growth, (2) provides the future transmission requirements of grandfathered wholesale agreements, (3) provides firm point-to-point transmission service, (4) provides network integration transmission service and (5) provides generator interconnection service ("local transmission expansion plan").

The SCE&G local transmission planning process develops a local transmission expansion plan, which is produced on an annual basis and provides for timely modifications and additions to the SCE&G transmission system to ensure reliable and economical transmission of electric power for our customers. Goals of the SCE&G local transmission planning process include developing a local plan and facilities to:

1. Transmit electric power from SCE&G generators to SCE&G native load and grandfathered wholesale customers
2. Transmit electric power from off-system purchases to SCE&G native load and grandfathered wholesale customers
3. Provide Transmission Service to Point-to-Point (PTP) and Network Customers
4. Provide Interconnection Service to all generators
5. Maintain synchronism with the Eastern Interconnection

The SCE&G local transmission planning process develops a ten (10) year expansion plan for the SCE&G transmission system considering the current performance and capabilities of the transmission system and the required future performance and capabilities of the transmission system. The SCE&G local transmission planning process ensures that the SCE&G transmission system is compliant with NERC Reliability Standards and SCE&G's Transmission Planning Criteria. SCE&G also seeks to evaluate and plan additions/facilities, for customers, economically, with overall cost savings in mind.

SCE&G's local transmission expansion plan is based on the following drivers:

1. Reliability Standards and Planning Criteria testing
2. Native load distribution needs
3. Native load Industrial Customer needs
4. Firm PTP Transmission Service needs
5. Network/Wholesale Customer needs
6. Generator Interconnection needs
7. SCE&G's Integrated Resource Plan (IRP)
8. Actual system performance
9. Needs driven by Public Policy Requirements

Any one or a combination of these drivers may require expansion of the SCE&G transmission system.

SCE&G is a registered Transmission Planner and performs planning analyses and interpretations using its own data and evaluation criteria that address NERC Transmission Planning (TPL) Reliability Standards and all other applicable Reliability Standards (see [www.nerc.com](http://www.nerc.com)) and the South Carolina Electric & Gas Company Transmission Planning Criteria (see "South Carolina Electric & Gas Company Transmission Planning Criteria," SCE&G OATT Attachment D).

#### **A. Reliability Standards and Planning Criteria**

SCE&G plans its transmission system to be compliant with the NERC Reliability Standards and to the South Carolina Electric & Gas Company Transmission Planning Criteria. These criteria dictate that the transmission system must be designed such that during any of the specified contingencies,<sup>3</sup> only short-time overloads, low voltages, and local loss of load will occur; and after appropriate switching and re-dispatching, all non-radial loads can again be served with reasonable voltages, and all facilities can again operate within acceptable limits.

#### **B. Types of Planning Studies Conducted**

The SCE&G Local Transmission Planning Process utilizes power flow, transient stability, power transfer, short circuit studies and cost/benefit analyses to determine

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<sup>3</sup> Specified in the NERC Standards and SCE&G Criteria.

when and how transmission expansion will occur. Power flow and transient studies are performed annually in compliance with NERC Planning Standards for both 1-5 year and 6-10 year planning horizons. In addition to the NERC Reliability Standard requirements, SCE&G also performs transmission planning to meet SCE&G Transmission Planning Criteria. The process differs for power flow, transient stability, and short circuit "base simulation case" development and is described in each section below.

a. Power Flow Modeling Data

SCE&G's aggregated load data is used to create dispersed system load models for the upcoming 10 years. Additional load information is obtained with input from customers. Other modeling components include generators, transmission lines, transformers, firm power transfers, capacitors, reactors, power circuit breakers, and FACTS devices. Power flow "base cases" are then developed by Transmission Owners within the SERC geographic area ("SERC area") through the SERC area Long Term Study Group (LTSG). The LTSG then provides its cases to the Eastern Interconnection Reliability Assessment Group (ERAG) Multi-regional Modeling Group (MMWG) for inclusion in the development of its cases.

b. Transient Stability Modeling Data

Transient stability "base cases" are developed by Transmission Owners within the SERC area through the SERC area Dynamics Study Group (DSG). These cases are then provided to the ERAG MMWG for inclusion in the development of its cases.

c. Short Circuit Modeling Data

Short circuit data is exchanged by the Transmission Owners through the SERC area Short Circuit Database Working Group (SCDWG).

Transmission planning studies also are performed for OATT PTP and Network Transmission Service Requests (TSR). TSR studies are performed in accordance with the SCE&G OATT. Transmission planning studies are performed for Generator Interconnection Requests (GIR). GIR studies are performed in accordance with FERC 18 CFR Part 35, "Standardization of Generator Interconnection Agreements and Procedures" issued July 24, 2003.

**C. Cost/Benefit Analyses**

One of SCE&G's transmission planning objectives is to develop a local plan that minimizes the long-term cost of expansion while maintaining expected levels of service and compliance with applicable standards. To accomplish this, SCE&G treats

all resources on a comparable basis and gives consideration that is technologically neutral to every viable alternative solution to identified transmission needs. These alternative solutions may include new transmission facilities, modifications to existing transmission facilities, generation siting or load-management opportunities. The SCE&G planning process considers these alternative options in determining if and when transmission expansion is needed.

#### **D. Joint Studies**

As part of developing a local transmission plan, transmission assessment studies are jointly conducted with neighboring transmission owners through the regional transmission assessment processes. These studies include near-term and long-term transmission assessment studies. Joint studies with neighboring transmission owners are performed on an annual cycle and as needed. The exchange of data and simulation cases for all studies is done in accordance with the "SERC Data Release Guidelines". Information regarding these studies is communicated to Stakeholders via the website and/or during a Stakeholder meeting.

#### **E. The Local Transmission Planning Cycle**

The SCE&G local transmission planning process is ongoing and perpetual. Proposed transmission plans are reviewed continuously as assessment and planning studies are conducted for numerous purposes. Any new input or adjustments to the study process or study results are reflected in all future studies.

The appended timeline illustrates how the SCE&G local planning processes described above take place over the course of a calendar year, including timelines and milestones for the coordination of models by SERC area Transmission Planners. The timeline is attached as Appendix K-2, "SCE&G Transmission Planning Process Timeline."

#### **F. Local Transmission Plan Approval**

After the modeling and assessment process is conducted, a local transmission expansion plan is produced that reflects consideration of alternatives to the local transmission expansion as submitted by Stakeholders or anyone else. SCE&G senior management approves the selected solution and if transmission expansion is the selected solution, the expansion project is included in the SCE&G transmission expansion plan, in accordance with FERC Orders and state regulation.

### **V. ORDER NO. 890 ECONOMIC TRANSMISSION PLANNING STUDIES**

#### **A. Economic Transmission Planning Studies**

The Economic Transmission Planning (ETP) Studies process allows Stakeholders to propose economic power transfers to be studied as part of the local transmission

planning process. ETP Studies determine the facilities or system changes on the SCE&G transmission system to address congestion and/or increase transfer capability on any direct interface. The final results of this process include cost and time estimates associated with implementing the facilities or system changes. The intent of the ETP Studies process is to provide information to Stakeholders and is not a commitment to build.

As described in Section III.E.1, in Meeting 2, Stakeholders may identify and request economic power transfer sensitivities to be studied. All requested sensitivities will be considered except sensitivities that specify specific generation resources. Up to five sensitivities will be studied per year. If more than five are requested, Stakeholders will vote to select which sensitivities will be studied. Sensitivities that are not selected by the SCSG as one of the five studied sensitivities will be studied only if the requestor(s) pays for the additional study efforts.

Stakeholders will consider clustering similar ETP Study requests. In this regard, if two or more ETP Study requests are similar in nature and SCE&G concludes that clustering such requests and studies is appropriate, SCE&G may, following communication with the Stakeholders, cluster those studies for purposes of the ETP Study and Report.

Requested economic power transfers with the source(s) and the sink(s) within the SCE&G transmission system will be studied by SCE&G. Requested transfers with the source(s) and the sink(s) within the SCRTP area will be jointly studied by SCE&G and Santee Cooper. Requested studies with the source(s) and/or the sink(s) outside the SCRTP area that are studied by SCE&G and Santee Cooper will include only the results for the SCRTP area and not include results for other areas.

## **B. Cost Allocation for Local Economic Projects<sup>4</sup>**

### **1. General**

The following provides SCE&G's methodology for allocating the actual costs of new local transmission facilities that do not fit under the general Tariff rate structure. In particular, this methodology addresses the allocation of the actual costs of local economic transmission upgrades that are identified in the Economic Planning Studies and that are not otherwise associated with transmission service provided under the Tariff and are not associated with the

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<sup>4</sup> SCE&G shall retain decision making authority for such decisions related to reliability planning consistent with its statutory responsibilities for reliability. The process described in this Attachment K is not intended to replace or diminish the obligations of SCE&G pursuant to its respective open access transmission tariff to, as applicable, provide transmission service to, or undertake construction of transmission expansion projects for, any transmission customer. Transmission expansion options will remain fully subject to the current reservation and request processes conducted through the OASIS, and the processes discussed here do not replace such OASIS processes for SCE&G.

provision of transmission service under other arrangements, such as SCE&G's provision of bundled service to its Native Load Customers. Transmission Service on SCE&G's transmission system must be applied in a manner consistent with the requirements and procedures as stated in the Transmission Provider's Tariff.

## **2. Cost Allocation Methodology for Economic Upgrades:**

- a. Identification of Economic Upgrades:** SCE&G's local transmission expansion plan will identify the transmission upgrades that are necessary to ensure the reliability of the transmission system and to otherwise meet the needs of long-term firm transmission service commitments ("Reliability Upgrades"). All of the upgrades identified in the Economic Planning Studies that are not identified in the transmission expansion plans, and are thus not such Reliability Upgrades, shall constitute "Economic Upgrades."
- b. Request for Performance of Economic Upgrades:** Within thirty (30) calendar days of the posting of the final results of the underlying Economic Planning Study(ies), one or more entities ("Initial Requestor(s)") that would like SCE&G to construct one or more Economic Upgrades identified in the Economic Planning Study(ies) may post a request for the Transmission Provider to construct such Economic Upgrades on the secured area of the SCRTP website, along with an identification of the amount of megawatts of transmission capacity for which the Initial Requestor(s) would like to take cost responsibility. The request must consist of a completed request application, the form of which will be posted on the SCRTP website ("Economic Upgrade Application"). Other entities ("Subsequent Requestor[s]") that also would like the Transmission Provider to construct the Economic Upgrades sought by the Initial Requestor[s] may also notify the Transmission Provider of their intent by posting such intent, along with the amount of megawatts of transmission capacity that they would like to take cost responsibility, on the SCRTP website within thirty (30) calendar days of the Initial Requestor's posting of its Economic Upgrade Application on the SCRTP website (collectively, the Initial Requestor[s] and the Subsequent Requestor[s] shall be referred to as the "Requestor[s]").
- c. Allocation of the Costs of the Economic Upgrades:** The actual costs of the Economic Upgrades shall be allocated to each Requestor based upon the amount of megawatts of transmission capacity that it requested responsibility for in its respective request posted on the SCRTP website. Should the total amount of transmission capacity identified by the Requestors not equal the amount of transmission capacity that is estimated to be added to the Transmission System by constructing the Economic Upgrade, then the Requestors' cost responsibility will be adjusted on a pro rata basis based upon the amount of capacity identified by the Requestors' relative to the total transmission capacity estimated to be added by the



Economic Upgrades so that all of the cost responsibility for the Economic Upgrades is allocated to the Requestors. If one or more of the Requestors do not identify the amount of megawatts for which they are willing to take cost responsibility, then the Requestors shall bear the actual costs of the Economic Upgrades in equal shares based upon the number of Requestors. The Requestors shall bear cost responsibility for the actual costs of the Economic Upgrades. Should a Requestor later not enter into an agreement with the Transmission Provider for the construction of the Economic Upgrades, then the remaining Requestors' cost responsibility will be recalculated on a pro rata basis based upon the amount of megawatts requested.

- d. Cost Allocation for the Acceleration, Expansion, Deferral, or Cancellation of Reliability Upgrades:** Should the Transmission Provider conclude that the construction of an Economic Upgrade would accelerate the construction of, or require the construction of a more expansive Reliability Upgrade, then the Requestors shall bear the cost of such acceleration or expansion. Should the Transmission Provider conclude that the construction of the Economic Upgrade would result in the deferral or cancellation of a Reliability Upgrade, then the actual cost of the Economic Upgrades allocated to the Requestors shall be reduced by the amount of savings caused by the deferral or cancellation.
- e. Implementing Agreements and Regulatory Approvals:** The Transmission Provider will not be obligated to commence design or construction of any Economic Upgrades until (i) a binding agreement(s) with all of the Requestors for such construction by the Transmission Provider and payment by the Requestors of their allocated cost responsibility is executed by the Parties and (ii) all of the Requestors provide the Transmission Provider security, in a form acceptable to the Transmission Provider, for the full costs of the design and construction. Furthermore, the Transmission Provider shall not be obligated to commence construction, or to continue construction, if all necessary regulatory approvals are not obtained, with the Transmission Provider having to make a good faith effort to obtain all such approvals. The actual costs associated with obtaining such regulatory approvals shall be included in the total costs of the Economic Upgrades and shall otherwise be borne by the Requestors.

## **VI. LOCAL TRANSMISSION NEEDS DRIVEN BY PUBLIC POLICY REQUIREMENTS**

In accordance with Order No. 1000, Stakeholders may identify transmission needs driven by Public Policy Requirements. A proposed transmission need must be described in sufficient detail to allow SCE&G to study whether that proposed transmission need is unmet, such that solutions for that need should be considered.

Examples of sufficient detail may include, as applicable, but are not limited to: a description of the needed transmission capability or transmission functionality associated with the Public Policy Requirement; a description of electric power source and sink points associated with the Public Policy Requirement; the amount of electric power and timing associated with the Public Policy Requirement.

SCE&G will not assess potential transmission needs that are described in generic, overly-vague terms that do not permit SCE&G to adequately determine what is required of the transmission system.

No proposed transmission need will be selected as an unmet need to be evaluated for potential solutions if that proposed need is met under existing local or regional plans.

SCE&G will post on the SCRTP website explanations of which transmission needs driven by Public Policy Requirements will be evaluated for potential solutions and an explanation of why other suggested transmission needs will not be evaluated.

Stakeholders may propose potential local solutions to transmission needs selected to be evaluated for potential solutions. An entity must be a Qualified Developer to propose regional solutions to transmission needs, for purposes of regional cost allocation, in accordance with Section VII.B. Stakeholders will be provided an opportunity to provide input during the evaluation of all potential solutions.

## **VII. REGIONAL TRANSMISSION PLANNING**

### **A. Introduction**

In accordance with Order No. 1000, SCE&G and Santee Cooper will produce a regional transmission plan, which includes regional transmission projects that have been selected for purposes of cost allocation. This plan will be produced when regional solutions are selected.

Qualified Developers may submit alternative regional solutions to meet the region's transmission needs. If the Transmission Providers determine that an alternative transmission solution is more efficient or cost-effective than transmission facilities in the local transmission plans, then the alternative solution is eligible for inclusion in the regional plan.

Consistent with Order No. 1000, nothing herein is intended to appropriate, supplant, or impede any local transmission planning processes that the Transmission Providers undertake.

Regional projects are projects that meet the following criteria:

- a. The operating voltage of the proposed transmission project must be 230 kV or above;

- b. A proposed transmission line must be over 50 miles in length;
- c. The proposed transmission project must be beneficial to both systems in the region;
- d. The estimated cost of the project must be \$10 million or above;
- e. The project must be a green-field facility;
- f. The Qualified Developer must secure its own ROW, and the Transmission Providers' use or control of existing ROW may not be altered unless agreed to by the Transmission Providers;
- g. The project must not be an upgrade to an existing facility;
- h. The project must be materially different from projects that are currently in the regional transmission expansion plan (or have been previously considered in the regional transmission expansion planning process) and the current local transmission expansion plan. That is, a Qualified Developer may not simply "bundle" several local projects into a single project and claim that it is a regional project;
- i. The project must be able to be constructed and integrated into the transmission system(s) by the required in-service date; and
- j. Owner of project will turn over functional control to the Transmission Provider (adhere to instructions from TSP and BAA), including, but not limited to: real-time reliability actions, coordination of maintenance schedules, and line outages. This does not include physical control of the asset.

**B. Qualification Criteria to Establish Eligibility to Submit a Regional Transmission Project for Selection in a Regional Transmission Plan**

Developers wishing to propose a transmission project for selection in the regional transmission plan for purposes of regional cost allocation must meet financial and technical criteria, as established herein. Developers must establish their eligibility prior to submitting a proposal.

Within 30 days of receiving a Developer's application for eligibility to propose a transmission project for selection in the regional transmission plan for purposes of cost allocation, the Transmission Providers will notify the Developer of any deficiencies in the application. Within six weeks of receiving a Completed Application, Transmission Providers will make a determination as to whether the Developer is qualified, as defined herein.

**1. Financial Criteria**

Each Developer must submit adequate financial information to allow the Transmission Providers to assess its financial capability and creditworthiness. Where such information is available and applicable, the Developer must provide the Transmission Providers:

- a. Audited Financial Statements;
- b. List of affiliates, parent companies, and subsidiaries;
- c. Publicly available information from credit reports by credit and bond rating agencies;
- d. Private credit ratings;
- e. Credit references;
- f. Statement of legal composition;
- g. Statement of length of time potential Developer's business has been in operation; and
- h. A summary of any history of bankruptcy, dissolution, merger, or acquisition of the Developer or any predecessors in interest for the current calendar year and the five calendar years immediately preceding its submission of information related to affiliated entities.

In order to determine creditworthiness, the Developer must meet one of the following criteria:

- a. The Developer has been in business at least one year and has a credit rating of at least "Baa3" (Moody's) or "BBB minus" (Standard & Poor's or Fitch's) (If rated by multiple agencies, the lowest rating applies); or
- b. The Developer has been in business at least one year, and provides its most recent financial statement, which demonstrates that it meets standards that are at least equivalent to the standards underlying credit ratings of "Baa3" or "BBB minus"; or
- c. The Developer's parent company meets either (a) or (b) above, and provides a satisfactory written guarantee to be unconditionally responsible for all financial obligations.

Developers should demonstrate their ability to assume liability for major losses resulting from any failure of facilities.

The Transmission Providers shall not share financial information submitted by Developers seeking to become Qualified Developers with any other Stakeholder or SCSG member.

## **2. Technical Expertise**

Each Developer must demonstrate its capability to develop, construct, operate, and maintain U.S. electric transmission projects of similar or larger complexity, size, and scope as the proposed project. At a minimum, the following must be demonstrated:

- a. Technical and engineering qualifications and experience;
- b. Past history of meeting transmission project schedules;
- c. Capability to adhere to standardized construction practices;
- d. Past history regarding construction of transmission facilities, including:
  - i. Cost containment capability and other advantages the Developer may have to build the specific project; and
  - ii. A discussion of the Developer's business practices that demonstrate that its business practices are consistent with good utility practices for proper permitting, licensing, designing, ROW acquisition, constructing, operating and maintaining transmission facilities that will become part of the transmission grid.
- e. Past history regarding O&M of transmission facilities and/or contracting for the O&M of transmission facilities;
- f. Capability to adhere to standardized O&M practices;
- g. How it intends to comply with all applicable reliability standards and to obtain the appropriate NERC certifications;
- h. Past record of compliance with NERC standards; and
- i. Historical ability to site, permit, procure equipment, construct, own, operate and maintain transmission facilities.

If a Developer is determined to be qualified to submit a proposed project, this qualification will continue for up to five years for any project proposed by that Developer that does not exceed a total price and scope of its initial proposed project. The Developer has an obligation to update any change to its submitted qualification application, regardless of the materiality of the change. If a

Developer submits a change to its submitted qualification application, the Transmission Provider will have the option to re-evaluate the Developer's qualification. Each Developer that desires to submit regional projects pursuant to the process herein must submit an application in full no less than every five years. The Transmission Providers reserve the right to ask for additional information from a Developer seeking qualification or a Developer that has been previously qualified.

### **3. Merchant Transmission Developers**

While Merchant Transmission Developers are not required to participate in the SCRTP process, they are required to provide adequate information and data to allow public utility transmission providers in the transmission planning region to assess the potential reliability and operational impacts of the Merchant Transmission Developer's proposed transmission facilities on other systems in the region.

In order to construct, own, operate and maintain transmission facilities, a Merchant Transmission Developer must demonstrate:

- a. That any such transmission facility will not compromise local or regional reliability; and
- b. A history of constructing, owning, operating, or maintaining, as applicable, comparable transmission facilities

Merchant developers must be willing to turn over functional control of their facility to the Transmission Provider.

The transmission facility owner and operator must meet all applicable FERC, NERC, SERC, South Carolina Public Service Commission regulatory requirements, as well as the interconnected transmission provider Facility Connection Requirements document (as required by NERC Reliability Standard FAC-001). The Transmission Provider requirements include, but are not limited to:

- System interconnection studies;
- Transmission system performance;
- Transmission facility equipment standards;
- Transmission facility control, instrumentation and communication requirements;
- Reactive power and voltage support;
- Grounding;

- Protection requirements;
- Inspection, maintenance and testing requirements; and
- Emergency operations.

### **C. Submitting a Regional Transmission Solution for Purposes of Cost Allocation**

Any Developer that desires to submit a regional transmission project for consideration in the regional transmission plan for purposes of cost allocation must be qualified in accordance with Section VII. B. Qualified Developers must submit the following information in support of a proposed regional transmission project:

- a. A description of the proposed transmission project that details the complete scope including, as relevant:
  - i. Description of Owners;
  - ii. Indication of whether the project is for reliability, public policy, or economic purposes;
  - iii. Description of the transmission facilities being proposed (e.g., voltage levels, etc.);
  - iv. The general path of the line(s);
  - v. All interconnection points with the transmission system;
  - vi. Various stages of the project, such as siting, licensing, permitting, ROW acquisition, engineering, construction, proposed in-service date, etc. NOTE: more detailed milestones will be developed if project is eligible for inclusion in the regional plan.
- b. A total capital cost estimate of the proposed transmission project, fully loaded, including contingencies and overhead, expressed in current year dollars. Cost estimates should be sufficiently detailed to demonstrate a good faith effort at estimating the cost and to allow the Transmission Providers to understand how the estimate was calculated. If the cost estimate differs greatly from generally accepted estimates of projects of comparable scope, the Developer submitting the project will be required to justify such discrepancies.
- c. A description of the developer's project financing approach.
- d. A reliability impact assessment, which takes into account the following:

- i. Explanation of how the project will abide by any transmission standards of Transmission Providers with which project will interconnect; and
- ii. Identification of any NERC standards that will be implicated by developing the project.
- iii. Any such transmission project must not compromise local or regional reliability and the transmission facility owner and operator must meet all applicable FERC, NERC, SERC, South Carolina Public Service Commission regulatory requirements, as well as the interconnected transmission provider Facility Connection Requirements document (as required by NERC Reliability Standard FAC-001). The Transmission Provider requirements include, but are not limited to:
  - System interconnection studies;
  - Transmission system performance;
  - Transmission facility equipment standards;
  - Transmission facility control, instrumentation and communication requirements;
  - Reactive power and voltage support;
  - Grounding;
  - Protection requirements;
  - Inspection, maintenance and testing requirements; and
  - Emergency operations
- e. System Impact Studies and Reports, including load flow cases that demonstrate the expected performance of the project and demonstrate that no applicable standard is violated at any point on the wide-area grid.
- f. Whether the project would require state transmission siting proceedings, National Environmental Policy Act review, or federal or state permits. Describe the legal authority, if any, that will need to be obtained by the Developer to site/own transmission under relevant state law. Identify the authorized governmental body that will review the application for siting approval for projects within the transmission region.
  - i. Describe the process the Developer will use to obtain transmission siting approval including the authority to acquire



rights of way by eminent domain, if necessary, that would facilitate approval and construction of the project.

- ii. Describe the process that the Developer will use for the preparation of any required application for siting approval, including milestones and a description of supporting studies and other evidence.
  - iii. Describe the Developer's experience in the areas above.
- g. Whether the project requires upgrades to any Transmission Provider's existing facilities or would require a Transmission Provider to alter its use and control of an existing right-of-way. NOTE: only projects that do not alter the Transmission Providers' use or control of rights-of-way will be considered for inclusion in the regional plan for purposes of cost allocation.
- h. Supporting documentation of the technical analysis performed to demonstrate that the proposed transmission project is either more efficient or cost-effective project than specific projects in the latest local transmission expansion plans presented to the Stakeholders and, where applicable, that the project resolves a transmission need driven by economics or a Public Policy Requirement that is not otherwise addressed. Documentation and information must include the following, as applicable:
- All planning data and supporting information necessary to evaluate the submitting Developer's analysis of the proposed transmission project against the Transmission Providers' criteria stated above; and
  - The identification of transmission projects in the latest expansion plans that may be avoided, canceled or postponed as a result of the proposed project, as well as any additional projects, or changes to other planned projects that may be required due to the proposed project; and, where applicable,
  - The economic need or transmission need driven by Public Policy Requirements that is not otherwise addressed.

A deposit of \$25,000 will be required for each project submittal, which will be applied towards and trued up based on the documented cost of the Transmission Providers' analysis. The actual costs incurred by the Transmission Providers to analyze projects submitted will be borne by the Developer.

Proposals must be submitted without any deficiencies by January 15 of each year in order to be included in that year's planning cycle. The Transmission Provider will notify the Developer if the submitted proposal is deficient.

#### **D. Transmission Needs Driven by Public Policy Requirements**

Stakeholders may identify transmission needs driven by Public Policy Requirements. In order for the Transmission Providers to determine whether solutions should be developed for the needs identified, a proposed transmission need must be described in sufficient detail to allow the Transmission Provider to study that proposed transmission need.

Examples of sufficient detail may include but are not limited to: a description of the needed transmission capability or transmission functionality associated with the Public Policy Requirements; if applicable, a description of electric power source and sink points associated with the Public Policy Requirements; and, if applicable, the amount of electric power associated and timing associated with the Public Policy Requirements.

The Transmission Providers will not assess transmission needs that are described in generic, overly-vague terms that do not permit the Transmission Providers to adequately determine what is required of the transmission system.

The Transmission Providers will post on the SCRTP website explanations of which transmission needs driven by Public Policy Requirements will be evaluated for potential solutions and an explanation of why other suggested transmission needs will not be evaluated.

No proposed transmission need will be selected to be evaluated for potential solutions if that need is met under existing local or regional plans.

Qualified Developers may propose regional solutions associated with the transmission needs selected to be evaluated for potential solutions. Stakeholders will be provided an opportunity to provide input during the evaluation of these potential solutions.

#### **E. Evaluation of Proposals for Selection in the Regional Plan for Purposes of Cost Allocation**

The Transmission Providers, in consultation with Stakeholders, will evaluate regional transmission projects proposed by Developers in conjunction with those identified by the Transmission Providers. Developers and Stakeholders may conduct an independent evaluation of the proposed regional project and submit written comments on that proposal for the Transmission Providers' consideration.

Utilizing coordinated models and assumptions, each Transmission Provider will utilize its respective planning guidelines and criteria to evaluate proposed projects and determine the following:

- a. Whether the proposal addresses transmission needs that are currently being addressed with projects in the latest local transmission expansion

plans and if so, which projects in the plans could be canceled or postponed by the proposed regional transmission project; and

- b. Whether any additional projects, or changes to other planned projects, are required due to the proposed project.

The Transmission Provider will evaluate the proposal against all applicable FERC, NERC, SERC, South Carolina Public Service Commission regulatory reliability requirements, as well as the interconnected transmission provider Facility Connection Requirements document (as required by NERC Reliability Standard FAC-001). The transmission provider requirements include, but are not limited to:

- System interconnection studies;
- Transmission system performance;
- Transmission facility equipment standards;
- Transmission facility control, instrumentation and communication requirements;
- Reactive power and voltage support;
- Grounding;
- Protection requirements;
- Inspection, maintenance and testing requirements; and
- Emergency operations

The inclusion of the proposed transmission project must yield a regional benefit to cost ratio of at least 1.25 and must not adversely impact reliability. No individual Transmission Provider shall incur increased, unmitigated transmission costs as a result of the proposed project.

- The benefit used in this calculation will be quantified by the transmission savings of cancelled or postponed projects in the current local expansion plans provided to Stakeholders including any reduction in scope and cost of other existing projects.
- The cost used in this calculation will be quantified by the cost of the proposed Regional Project plus the cost of any additional projects, or changes to other planned projects required due to the proposed project.

Based upon the evaluation outlined above, the Transmission Providers will assess whether the proposed transmission project is more efficient or cost-effective for the region.

The proposed regional transmission project may be included in the regional plan for purposes of cost allocation if the proposal:

- a. Is determined to be more efficient or cost effective than projects in the existing local transmission expansion plans;

NOTE: If more than one project meets the 1.25 benefit to cost ratio, both projects may be considered for selection, regardless of whether one has a lower cost than the other.

- b. Continues to remain needed, reliable, and more efficient or cost effective; and
- c. Is approved by the Transmission Providers whose local transmission expansion plans would be altered with the inclusion of the proposal and their relevant jurisdictional and/or governance authorities:
  - Santee Cooper: Senior Management and/or Board of Directors of the South Carolina Public Service Authority
  - SCE&G: South Carolina Public Service Commission

#### **F. Contractual Agreement**

When a proposal is selected in the regional plan a Contractual Agreement will be developed to address the following:

- a. Communication responsibilities of the transmission Developer and the Transmission Providers
- b. Detailed key milestones and anticipated schedules associated with the proposal, including, but not limited to:
  - i. Required regulatory approvals;
  - ii. Design, procurement, and construction;
  - iii. Reports for completion of each milestone and required testing and certification; and
  - iv. Timing and frequency of project updates.
- c. Circumstances prompting reevaluation in order to assess the appropriate timing of the proposed regional transmission project
- d. Reevaluation may result in the need for the potential advancement, deferment, or removal of the regional transmission project

- e. Credit enhancement (guaranties, bonds, letters of credit)
- f. Insurance requirements, including, but not limited to a performance bond
- g. Interconnection provisions
- h. Project requirements and specifications, including rights of way, permits, and equipment
- i. Project budget/updated detailed cost estimates
- j. Project benefits
- k. Responsibility for meeting NERC standards
- l. EPC Contract Requirements, including turn key warranty, warranty period, minimum remedies, creditworthiness of contractor, and assignability
- m. Operations and maintenance responsibilities
- n. Responsibilities for capital repairs during operation period
- o. Provisions indicating that transmission service over facilities will be provided pursuant to SCE&G and/or Santee Cooper OATT and delineation of which facilities are subject to which OATT
- p. Capacity and transmission rights
- q. Allocation of costs
- r. Representations and warranties
- s. Condemnation
- t. Assignment of agreement
- u. Indemnification
- v. Limitation of liability
- w. Termination rights
- x. Dispute resolution

At this time, the Qualified Developer must demonstrate that it continues to meet the Qualification and Technical Criteria, as defined in Section VII.B.

#### **G. Required Project Updates**

If a project is selected in the regional plan for purposes of cost allocation, the project Developer will be required to submit periodic updates, as appropriate to the project, to the Transmission Providers. The timing and frequency of these updates will be addressed in the Contractual Agreement.

#### **H. Abandonment**

If a Regional Project is abandoned by a Developer, the impacted Transmission Providers may seek to complete the Regional Project (in accordance with all applicable laws and regulations) or to propose alternative projects (including non-transmission alternatives) that will ensure that any reliability need is satisfied in an adequate manner. If a NERC Registered Entity believes that abandonment will cause a specific NERC Reliability Standard to be violated, and the Transmission Providers have not chosen to complete the project in order to prevent the violation, or cannot complete such a project in a timely fashion, the NERC Registered Entity will be expected to submit a mitigation plan to the appropriate entity to address the violation.

#### **I. Reevaluation**

Only projects selected in the regional plan for purposes of cost allocation are subject to reevaluation. In order to remain in the regional plan for purposes of cost allocation, the project must remain needed, reliable, and more efficient or cost effective.

The Transmission Providers will review periodic updates from the project Developer as specified in the Contractual Agreement to determine whether any delays associated with completion of a transmission project have the potential to adversely affect an incumbent transmission provider's ability to fulfill its reliability needs or service obligations.

If the Transmission Providers determine that delays may affect reliability or service obligations, the Transmission Providers may propose regional solutions for purposes of cost allocation or may develop local solutions to ensure they can continue to fulfill their reliability needs or service obligations.

#### **J. Cost Allocation**

If a regional transmission project is selected in the regional plan for purposes of cost allocation, the Transmission Providers will be allocated costs in proportion to their respective benefit. The beneficiaries of a proposed project will be the Transmission Providers that are benefitting themselves or the Transmission Providers that are benefitting on behalf of their customers.

The benefit used in this calculation will be quantified by the transmission costs avoided by the regional project. The cost used in this calculation will be quantified

by the cost of the proposed project plus the cost (or minus the savings) of any additional projects required to implement the proposal.

The benefit-to-cost ratio calculation would be expressed: Total Cost of Avoided Transmission ÷ Total Cost of the Regional Project (including the cost of any additional projects required to implement the proposal) > 1.25.

Cost Allocation will be based on the benefit of avoided transmission cost.

- (Transmission Provider A's Total Avoided Transmission Cost/Total (A+B) Avoided Transmission Cost) \* Total Cost of Regional Project = Transmission Provider A's Cost Allocation
- Example: The proposed Regional Project costs \$350M; SCE&G avoids a \$300M project and Santee Cooper avoids a \$150M project. SCE&G pays 2/3 TRR of Regional Project, Santee Cooper pays 1/3 TRR.

## **VIII. DISPUTE RESOLUTION**

Disputes that arise from procedural or substantive issues as related to Order No. 890 or Order No. 1000 will be resolved in the following manner:

### **A. Resolution Procedures**

Disputes shall be referred to a senior representative of SCE&G and to a senior representative(s) of the individual Stakeholder(s) or Developer, as applicable, bringing the dispute for resolution on an informal basis as promptly as practicable. In the event the designated representatives are unable to resolve the dispute by mutual agreement within ninety (90) days from the date of receiving written notice of such dispute (or such other period as the disputing parties may agree upon), such dispute then may be submitted to nonbinding arbitration and resolved in accordance with the arbitration procedures set forth below.

### **B. Arbitration Procedures.**

Any dispute submitted to arbitration as described above shall be processed in accordance with the Uniform Arbitration Act and, to the extent not inconsistent therewith, the Commercial Arbitration Rules of the American Arbitration Association ("AAA"), as amended and in effect on the date that demand for arbitration is filed with the AAA. The arbitration shall be conducted by a single arbitrator. Each party to the arbitration shall select an arbitrator candidate. The AAA shall then select an arbitrator from such candidates according to its reasonable judgment. The arbitrator shall issue a decision no later than ninety (90) days from the date a party to the arbitration receives written notice that a dispute was not resolved by mutual agreement, and therefore, must be submitted to arbitration. The expenses of the arbitration shall be borne equally

by the parties to the arbitration, provided that each party shall pay for and bear the cost of its own experts, evidence and legal counsel.

Notwithstanding anything to the contrary in this Section, any affected party may refer the matter to the Federal Energy Regulatory Commission at any time, for example, by filing with the Commission a complaint under Section 206 of the Federal Power Act, a request for declaratory order, or a change in rate under Section 205 of the Federal Power Act.

## **IX. AREA-WIDE FEASIBILITY ASSESSMENTS AND COORDINATION**

SCE&G coordinates with other Transmission Planners in the SERC area for the creation of a SERC area-wide model and the preparation of simultaneous feasibility assessments. The purpose of these assessments is to further augment the reliability of each utility's bulk power system through coordination of the plans of each neighboring bulk power system.

SCE&G utilizes an approach coupling local planning activities with (a) information sharing, (b) coordinated assessments and (c) joint planning efforts. Appendix K-2 to this Attachment K provides a diagram of the planning process. In all processes described below, Stakeholder input is considered. The models and plans described below are presented and discussed in the SCRTP process.

### **Facilitation of Local Planning (Information Sharing)**

Facilitation of Local Planning is an extension of local transmission planning wherein two or more individual systems cooperate by exchanging information about their existing facilities and future plans so that each system or group, acting on its own, can individually assess the simultaneous feasibility of plans and performance. Normally, system facility data and computer power flow models are included in the information exchange. Any individual system plans developed as a result of the Facilitation of Local Planning is the individual system's responsibility for implementation. The results of the Facilitation of Local Planning may lead to Joint Planning efforts among two or more systems, as described below.

To ensure the Facilitation of Local Planning is effective, systems share through these modeling efforts their best currently available estimates of future system conditions and plans. The sharing of this information for future years is intended to provide ample time for other affected systems to react, through their local planning processes, to changes in the plans of neighboring systems that may have significant impacts.

SCE&G participates in the Facilitation of Local Planning through annual joint modeling efforts with neighboring systems. In addition, more frequent exchange of information occurs, when appropriate, such as during coordinated assessment activities.



## **1. Coordination Activities within the SERC area**

### **a. Transmission System Modeling**

SCE&G's 10-year local transmission expansion plan is the basis for our planning and assessment activities and is also our input into the SERC area transmission models developed annually by the Transmission Planners in the SERC area.

As a Transmission Planner in the SERC area, SCE&G participates in the creation of SERC area-wide transmission system models used in the local planning process, the regional SCRTP process and inter-regional assessment processes.

Models of the transmission systems are developed by the Transmission Planners in the SERC area through an annual model development process. Each Transmission Planner in the SERC area, incorporating input from local and regional planning processes, and develops and submits its 10-year transmission models to a model development databank. The databank then joins the models to create SERC area-wide models for use in reliability planning and assessments. Additionally, the SERC area-wide models are then used in each regional planning process as an update (as needed) to the current transmission models and as a foundation (along with the MMWG models) for the development of next year's transmission models.

The development of local area and regional reliability plans is facilitated through the creation of these transmission models that incorporate the current 10-year transmission expansion plans, load projections, resource assumptions (generation, demand response, and imports), transmission service commitments and interconnection service commitments within the area. The transmission models also incorporate external regional models (at a minimum the current SERC area models) that are developed using similar assumptions.

### **b. Inter-Regional Reliability Assessments**

Inter-Regional Reliability Assessments are processes in which two or more individual systems agree to exchange necessary data and system plans and collectively monitor and assess conformance to a specific set of criteria and guides, such as the national and utility reliability standards associated with planning. This process inherently recognizes the potential effects of each system's plans on the other interconnected systems in matters of efficiency and reliability. Results of such assessments are taken into consideration during local planning processes of the participating systems where specific plans addressing any identified "system" deficiencies are developed. This process ensures that interconnected systems share system plans and that analyses of these plans are conducted to assess if these plans are simultaneously feasible and otherwise use consistent assumptions and data. When these coordinated assessments determine that system plans are not simultaneously feasible, Joint Planning efforts among

two or more systems, as described below, or additional Local Planning efforts are required.

As a Transmission Planner within the SERC area, SCE&G participates in assessments of the models discussed above. SCE&G then participates with SERC area Transmission Planners to conduct a SERC area-wide long term reliability assessment. The purpose of the SERC area-wide reliability assessments is to determine if the different local and regional reliability transmission expansion plans are simultaneously feasible and to otherwise ensure that these processes are using consistent models and data. The SERC-wide assessments serve as a valuable tool for each of the participating Transmission Planners to reassess the need for additional inter-regional reliability joint studies.

The transmission models created for use in developing the local and regional reliability 10-year transmission expansion plans are analyzed to determine if any planning criteria concerns are projected. In the event one or more planning criteria concerns are identified, the affected Transmission Planners will develop solutions for these projected limitations in accordance with existing bilateral agreements. As a part of this study process, the Transmission Planners will reexamine the current 10-year transmission expansion plans (determined through the previous year's local and regional reliability planning processes) to determine if the current plans can be optimized based on the updated assumptions and any new planning criteria concerns identified in the analysis. The optimization process may include the deletion and/or modification of any of the existing reliability transmission enhancements identified in the previous year's reliability planning process. The Transmission Planners also determine if any transmission systems in another region are potentially impacted by projected solutions. Potentially impacted systems determine if there is a need for joint or coordinated studies, and if so, such studies are initiated.

## **2. Coordination Activities within VACAR Area**

SCE&G coordinates with Transmission Planners in the Virginia-Carolinas (VACAR) area. VACAR area Transmission Planners typically analyze the performance of proposed combined future transmission systems based on five- or ten-year projections. These studies are similar to those conducted for the SERC area, but are focused on the VACAR area.

## **3. Coordination Activities within ERAG & SERC-RFC East**

SERC area Transmission Planners are Members of the Eastern Interconnection Reliability Assessment Group (ERAG), as are Transmission Planners in the Florida Reliability Coordinating Council, Inc., the Midwest Reliability Organization, the Northeast Power Coordinating Council, Inc., ReliabilityFirst Corporation, and the Southwest Power Pool. ERAG augments the reliability of the bulk-power system through periodic reviews of generation and transmission expansion programs and

forecasted system conditions within the areas served by ERAG Transmission Planners.

The ERAG Multi-Regional Modeling Working Group (MMWG) administers the development of a library of power-flow base case models for the benefit of members.

The SERC-RFC East study group was established in 2006 and is a sub-group within the ERAG structure. Through the SERC-RFC East study group, coordination of plans, data and assumptions is achieved between Tennessee Valley Authority, the VACAR area, and the transmission systems of the eastern portion of PJM.

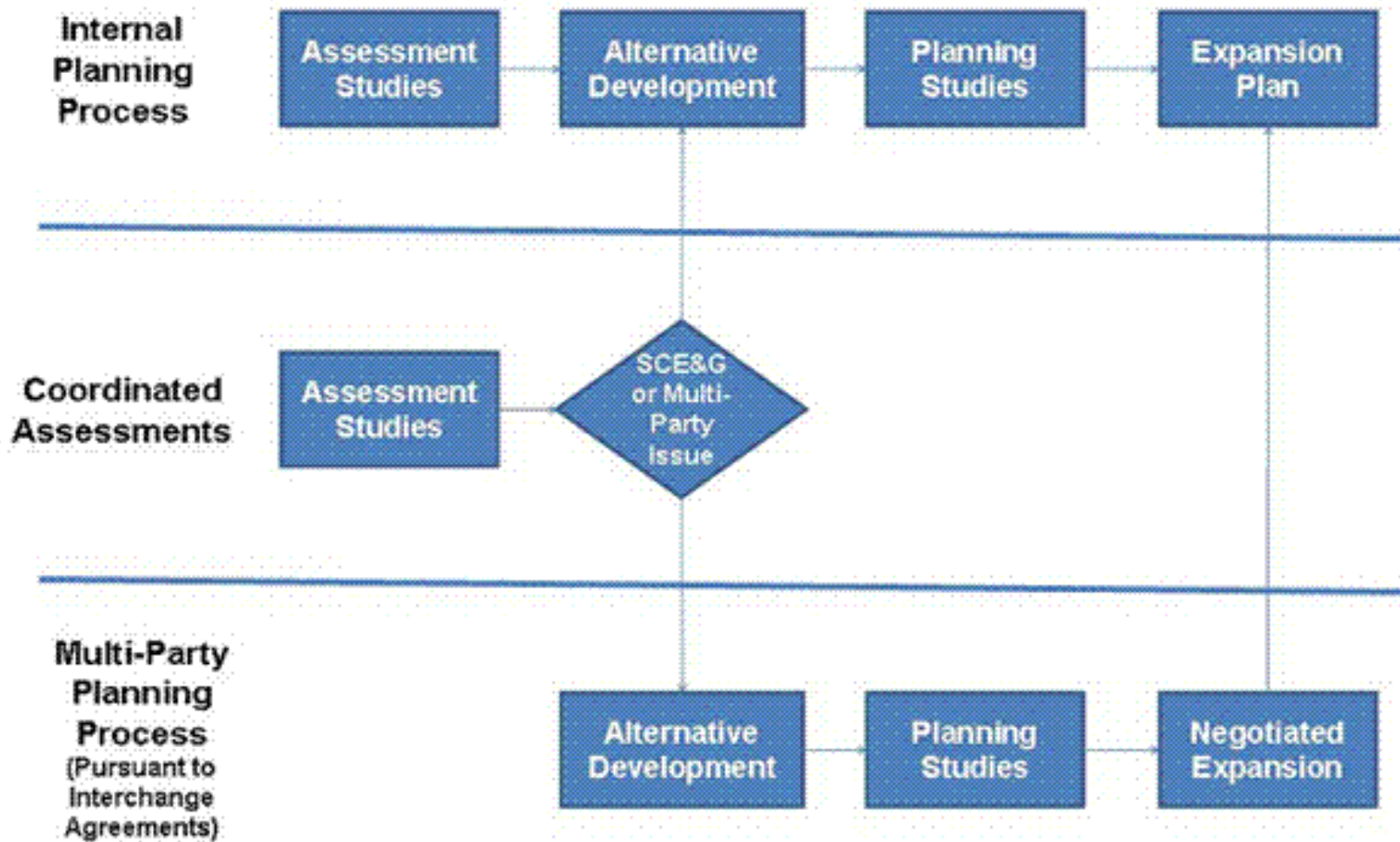
#### **4. Joint Planning**

Joint Planning is a process in which two or more systems plan as if they were a single system but do not relinquish their responsibility for planning their individual systems. This is usually done to address a specific concern of the interconnected system or to investigate possible mutually beneficial solutions to a given set of local issues. This is distinguished from Order No. 1000 regional planning in that the Transmission Providers do not seek cost allocation for such projects. The systems agree to perform studies and plan system additions based on agreed upon criteria, guides, and performance goals. Virtually all system data and plans are exchanged except for proprietary business data. The systems agree on how the resulting joint plan will be accepted, rejected or approved. The systems usually join together to implement the approved plan through a contractual mechanism that delineates the responsibilities of each system.

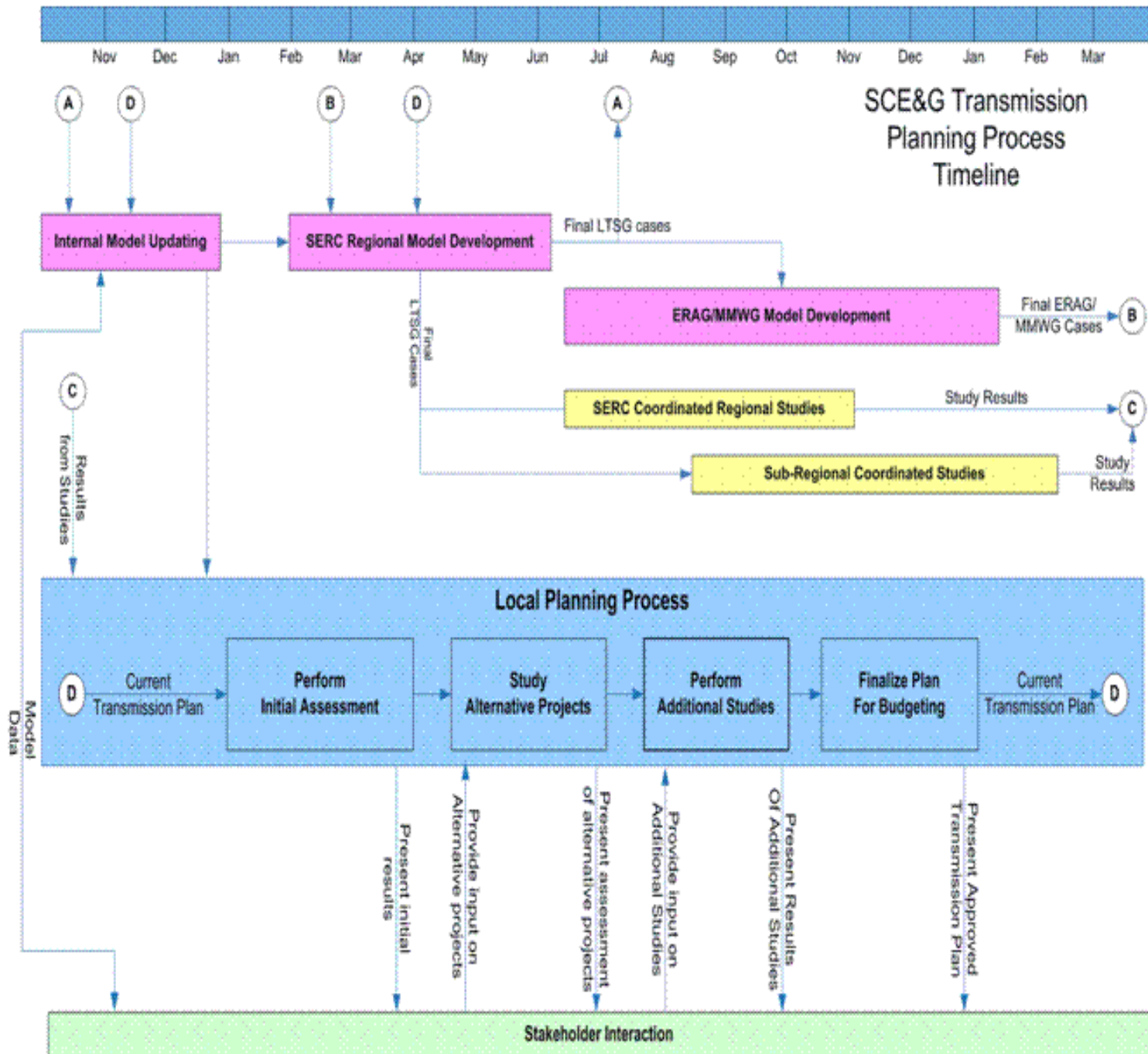
For SCE&G, Joint Planning typically takes place with a neighboring system where detailed assessments are conducted and negotiations under Interchange Agreements are used to agree on, commit to and implement detailed plans. These agreements are longstanding agreements that require SCE&G and each of its neighboring transmission owners to conduct coordinated assessments and to conduct local planning or joint planning to address and resolve any and all issues discovered as a result of Coordinated Assessments. SCE&G has Interchange Agreements with Santee Cooper, Duke Energy, Progress Energy Carolinas and Southern Company.

# SCE&G Transmission Planning Process

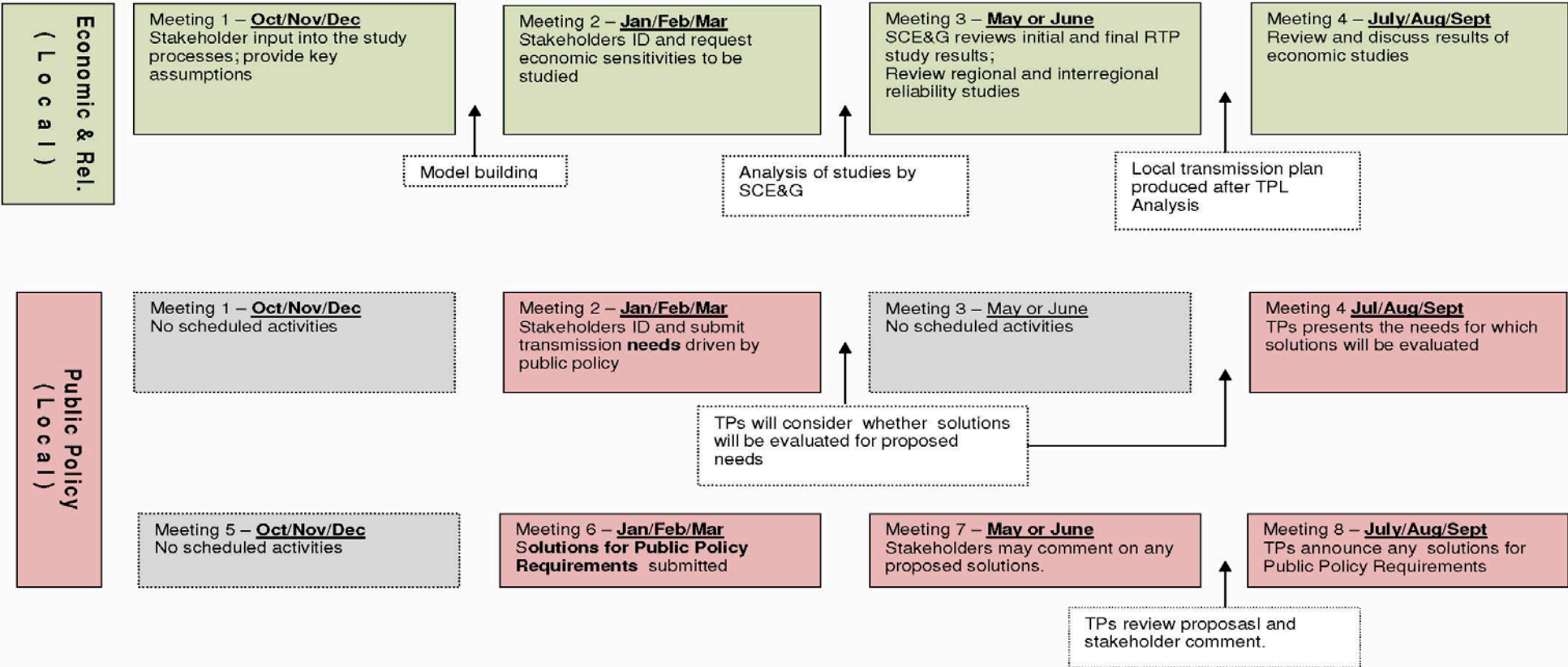
## Appendix K-1



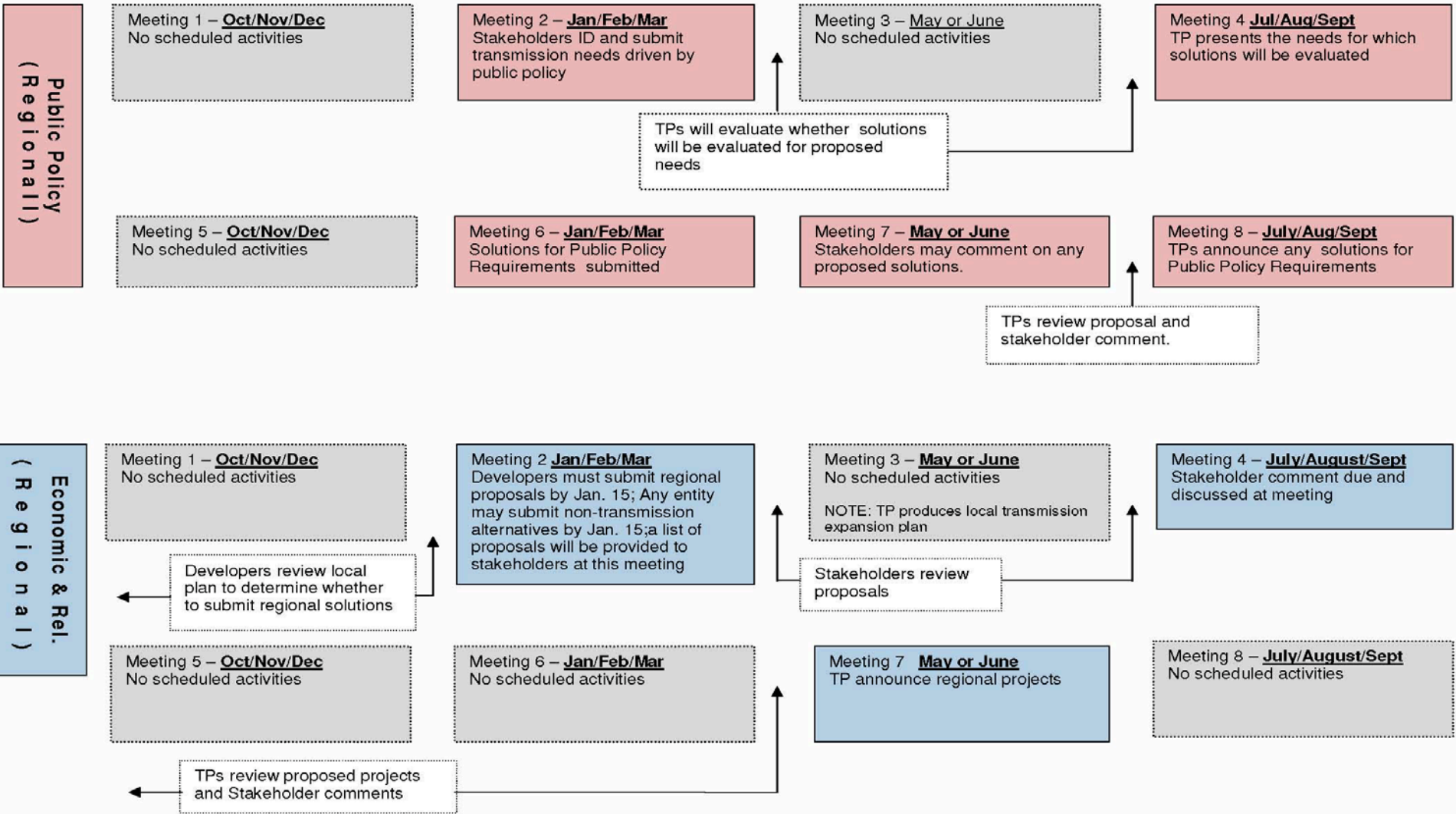
# Appendix K-2



### Appendix K-3 Timeline for Local Transmission Planning



## Appendix K-4 Timeline for Regional Transmission Planning



## **APPENDIX K-6**

### **Interregional Transmission Coordination Between the SCRTP and SERTP Regions**

#### **INTRODUCTION**

Through the South Carolina Regional Transmission Planning Process (“SCRTP”), the enrolled Transmission Providers within the SCRTP (“Transmission Providers”) coordinate with the public utility transmission providers in the Southeastern Regional Transmission Planning Process (“SERTP”) to address transmission planning coordination issues related to interregional transmission facilities. The interregional transmission coordination procedures include a detailed description of the process for coordination between the Transmission Providers in the SCRTP and public utility transmission providers in the SERTP (i) with respect to an interregional transmission facility that is proposed to be located in both transmission planning regions and (ii) to identify possible interregional transmission facilities that could address transmission needs more efficiently or cost effectively than transmission facilities included in the respective regional or local transmission plans. The interregional transmission coordination procedures are hereby provided in this Appendix K-6 with additional materials provided on the SCRTP Regional Planning website.

For purposes of this Appendix K-6, the SCRTP regional transmission planning process is the process described in Appendix K-6 of this Tariff; the SERTP’s regional transmission planning process is the process described in the SERTP’s Transmission Providers’ Tariff Sections. References to the respective regional transmission planning processes in this Appendix K-6 are intended to identify the activities described in those Tariff provisions. Unless noted otherwise, Section references in this Appendix K-6 refer to Sections within this Appendix K-6.



Through the interregional transmission coordination procedures the Transmission Providers provide:

- (1) A commitment to coordinate and share the results of the SCRTP and the SERTP transmission plans to identify possible interregional transmission projects that could address transmission needs more efficiently or cost-effectively than separate transmission facilities, as well as a procedure for doing so;
- (2) A formal procedure to identify and jointly evaluate transmission facilities that are proposed to be located in both transmission planning regions;
- (3) A duty to exchange, at least annually, planning data and information; and
- (4) A commitment to maintain a website or e-mail list for the communication of information related to the coordinated planning process.

The Transmission Providers in the SCRTP and the transmission providers located in the SERTP shall maintain a mutually agreeable cost allocation method for new interregional transmission facilities that are located within both transmission planning regions. Such cost allocation methodology, which satisfies the six interregional cost allocation principles set forth in Order No. 1000, is included in this Appendix K-6.

#### **INTERREGIONAL TRANSMISSION PLANNING PRINCIPLES**

Representatives of the SCRTP and the SERTP will meet no less than once per year to facilitate the interregional coordination procedures described below (as applicable). Representatives of the SCRTP and the SERTP may meet more frequently during the evaluation of project(s) proposed for purposes of interregional cost allocation between the SCRTP and the SERTP.

## **1. Coordination**

**1.1 Review of Respective Regional and Local plans:** Biennially, the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP region shall review each other's current regional and local plan(s) and engage in the data exchange and joint evaluation described in Sections 2 and 3.

**1.2 Review of Proposed Interregional Projects:** The Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP will coordinate with regard to the evaluation of interregional transmission projects identified by the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP as well as interregional transmission projects proposed for Interregional Cost Allocation Purposes ("Interregional CAP"), pursuant to Sections 3 and 4, below. Initial coordination activities regarding new interregional proposals will typically begin during the third calendar quarter. The SCRTP and the SERTP will typically exchange status updates for new interregional transmission project proposals or proposals currently under consideration every six (6) months, or as needed. These status updates will include, if applicable: (i) an update of the region's evaluation of the proposal; (ii) the latest calculation of Regional Benefits (as defined in Section 4.2); (iii) the anticipated timeline for future assessments; and (iv) reevaluations related to the proposal.

**1.3 Coordination of Assumptions Used in Joint Evaluation:** The Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP will coordinate assumptions used in joint evaluations, as necessary,

which includes items such as:

- Expected timelines/milestones associated with the joint evaluation
- Study assumptions
- Regional benefit calculations.

## **2. Data Exchange**

- 2.1** At least annually, the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP shall exchange power-flow models and associated data used in the transmission planning processes to develop their respective then-current regional and local transmission plan(s). This exchange will typically occur by the beginning of each region's transmission planning cycle. Additional transmission-based models and data may be exchanged between the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP as necessary and if requested. For purposes of the interregional coordination activities outlined in this Appendix K-6, data and models used in the development of the SCRTP and the SERTP then-current regional and local transmission plans and used in their respective transmission planning processes will be exchanged. This data will be posted on the pertinent regional transmission planning process' website, consistent with the posting requirements of the respective regional transmission planning processes, and may be treated as CEII as appropriate. The SCRTP shall notify the SERTP of such posting.
- 2.2** The SCRTP regional and local transmission plans will be posted on the SCRTP website pursuant to the SCRTP regional transmission planning process. SCRTP

Transmission Providers will also notify the SERTP of such posting. The SERTP will exchange its then-current regional and local plan(s) in a similar manner according to its regional transmission planning process.

### **3. Joint Evaluation**

**3.1 Identification of Interregional Projects:** The Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP shall exchange planning models and data and current regional and local transmission plans as described in Section 2. The Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP will review one another's then-current regional and local plan(s) in accordance with the coordination procedures described in Section 1 and their respective regional transmission planning processes. If, through this review, the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP identify a potential interregional project that could be more efficient or cost effective than projects included in the respective regional or local plans, the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP will jointly evaluate the potential project pursuant to Section 3.3.

**3.2 Identification of Interregional Projects by Stakeholders:** Stakeholders may propose projects that may be more efficient or cost-effective than projects included in the SCRTP and the SERTP regional or local transmission plans. Stakeholders may propose these projects pursuant to the procedures in each region's regional transmission planning processes. (See SCE&G AppendixK Section VIII.C.) The Transmission Providers in the SCRTP and the public utility

transmission providers in the SERTP will evaluate interregional projects proposed by stakeholders pursuant to Section 3.3.

**3.3 Evaluation of Interregional Projects:** The Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP shall act through their respective regional transmission planning processes to evaluate potential interregional transmission projects and to determine whether the inclusion of any potential interregional transmission projects in each region's regional transmission plan would be more efficient or cost-effective than projects included in their respective then-current regional or local transmission plans. Such analysis shall be consistent with accepted transmission planning practices of the respective regions and the methods utilized to produce each region's respective regional and local transmission plan(s). To the extent possible and as needed, assumptions and models will be coordinated between the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP as described in Section 1. Data shall be exchanged to facilitate this evaluation using the procedures described in Section 2.

**3.4 Initial Evaluation of Interregional Projects Proposed for Interregional Cost Allocation Purposes:** If an interregional project is proposed in the SCRTP and the SERTP for Interregional CAP, the initial evaluation of the project will typically begin during the third calendar quarter, with analysis conducted in the same manner as analysis of interregional projects identified pursuant to Sections 3.1 and 3.2. Projects proposed for Interregional CAP shall also be subject to the requirements of Section 4.

- 4. Cost Allocation:** If an interregional project is proposed for Interregional CAP in the SCRTP and the SERTP, then the following methodology applies:

**4.1 Interregional Projects Proposed for Interregional Cost Allocation Purposes:**

For a transmission project to be considered for Interregional CAP within the SCRTP and the SERTP, the following criteria must be met:

- A. The transmission project must be interregional in nature:
- Be located in both the SCRTP and the SERTP region;
  - Interconnect to the transmission facilities of one or more SCRTP Transmission Providers and interconnect with the transmission facilities of one or more SERTP Sponsors;
  - Meet the qualification criteria for transmission projects potentially eligible to be included in the regional transmission plans for purposes of cost allocation in both the SCRTP and the SERTP, pursuant to their respective regional transmission planning processes.
- B. On a case-by-case basis, the Transmission Providers in the SCRTP and the public utility transmission providers in the SERTP will consider a transmission project that does not satisfy all of the criteria specified in Section 4.1.A but: (i) meets the threshold criteria for a project proposed to be included in the regional transmission plan for purposes of cost allocation in only one of the two regions; (ii) would be located in both regions; and (iii) would be interconnected to the transmission facilities of one or more of the SCRTP Transmission Providers and interconnect with

the transmission facilities of one or more of the SERTP Sponsors.

- C. The transmission project must be proposed for purposes of cost allocation in both the SCRTP and the SERTP.
  - The transmission developer and project submittal must satisfy all criteria specified in the respective regional transmission processes.
  - The proposal should be submitted in the timeframes outlined in the respective regional transmission planning processes.

#### **4.2 Evaluation of Interregional Projects Proposed for Interregional Cost**

**Allocation Purposes:** Interregional projects proposed for Interregional CAP in the SCRTP and the SERTP shall be evaluated within the respective regions as follows:

- A. Each region, acting through its regional transmission planning process, will evaluate proposals to determine whether the proposed project(s) addresses transmission needs that are currently being addressed with projects in its regional or local transmission plan and, if so, which projects in the regional or local transmission plan could be displaced by the proposed project(s).
- B. Based upon its evaluation, each region will quantify a Regional Benefit based upon the transmission costs that each region is projected to avoid due to its transmission project(s) being displaced by the proposal.
  - For purposes of this Appendix K-6, “Regional Benefit” means the total avoided capital costs of projects included in the then-current regional or local transmission plans that would be displaced if the

proposed interregional transmission project was included. The Regional Benefit is not necessarily the same as the benefits used for purposes of *regional* cost allocation.

**4.3. Calculation of Benefit to Cost Ratio:** Each region will calculate a regional benefit to cost (“BTC”) ratio consistent with its regional process and compare the BTC ratio to its respective threshold to determine if the interregional project appears to be more efficient or cost effective than those projects included in its current regional or local transmission plan. For purposes of this BTC ratio evaluation:

- A. Each region shall utilize the benefit calculation(s) as defined in such region’s regional transmission planning process (for purposes of clarity, these benefits are not necessarily the same as the Regional Benefits determined pursuant to Section 4.2).
- B. Each region shall utilize the cost calculation(s) as defined in such region’s regional transmission planning process. The anticipated percentage allocation of costs of the interregional project to each region shall be based upon the ratio of the region’s Regional Benefit to the sum of the Regional Benefits identified for both the SCRTP and the SERTP. The Regional Benefits shall be determined pursuant to the methodology described in Section 4.2.

Regional BTC assessments shall be performed in accordance with each region’s regional transmission planning process, including but not limited to subsequent calculations and reevaluations.



**4.4 Inclusion in Regional Transmission Plans:** An interregional project proposed for Interregional CAP in the SCRTP and the SERTP will be included in the respective regional transmission plans for purposes of cost allocation after:

A. Each region has performed all evaluations, as prescribed in its regional transmission planning process, necessary for a project to be included in its regional transmission plan for purposes of cost allocation. (See SCE&G Attachment K Section VII.E.)

- This includes any regional BTC ratio calculations performed pursuant to Section 4.3; and

B. All approvals and agreements, as prescribed in its regional process, necessary for a project to be included in the regional transmission plan for purposes of cost allocation have been obtained.

Any interregional project selected in the SCRTP regional transmission plan for Interregional CAP shall provide to required project updates in accordance with SCE&G Attachment K Section VII.G.

**4.5 Allocation of Costs Between the SCRTP and the SERTP:** The cost of an interregional project, selected for purposes of cost allocation in the regional transmission plans of both the SCRTP and the SERTP, will be allocated as follows:

A. Each region will be allocated a portion of the interregional project's costs in proportion to such region's Regional Benefit to the sum of the Regional Benefits identified for both the SCRTP and the SERTP.

- The Regional Benefits used for this determination shall be based

upon the last Regional Benefit calculation performed – pursuant to the method described in Section 4.2. – before each region included the project in its regional transmission plan for purposes of cost allocation and as approved by each region.

- B. Costs allocated to each region shall be further allocated within each region pursuant to the cost allocation methodology contained in its regional transmission planning process.

**4.6 Removal from Regional Plans:** An interregional project may be removed from the SCRTP or the SERTP regional plan for purposes of cost allocation: (i) if the developer fails to meet developmental milestones; (ii) pursuant to the reevaluation procedures specified in the respective regional transmission planning processes; or (iii) if the project is removed from one of the region’s regional transmission plans pursuant to the requirements of its regional transmission planning process.

- A. The SCRTP Transmission Providers shall notify the SERTP if an interregional project or a portion thereof is likely to be removed from its regional transmission plan.

**4.7 Abandonment:** If an interregional project is abandoned, the impacted Transmission Provider(s) may seek to complete the interregional project (in accordance with all applicable laws and regulations) or to propose alternative projects (including non-transmission alternatives) that will ensure that any reliability need is satisfied in an adequate manner. If a NERC Registered Entity believes that abandonment will cause a specific NERC Reliability Standard to be violated, and the Transmission Provider(s) have not chosen to complete the

project in order to prevent the violation, or cannot complete such a project in a timely fashion, the NERC Registered Entity will be expected to submit a mitigation plan to the appropriate entity to address the violation.

## **5. Transparency**

- A. The SCRTP Transmission Providers shall post procedures for coordination and joint evaluation on the SCRTP website.
- B. Access to the data utilized will be made available through the SCRTP website subject to the appropriate clearance, as applicable (such as CEII and confidential non-CEII). The SCRTP Transmission Providers will make available, on the SCRTP website, links for stakeholders to register (if applicable/available) for the stakeholder committees or distribution lists of the SERTP planning region.
- C. The SCRTP Transmission Providers will provide status updates of the interregional transmission planning activities during their regional transmission planning meetings. The SCRTP Transmission Providers will provide status updates of interregional activities including:
  - Facilities to be evaluated
  - Analysis performed
  - Determinations/results.
- D. Stakeholders will have an opportunity to provide input and feedback within the SCRTP regional transmission planning process and the SERTP related to interregional facilities identified, analysis performed, and any determination/results. Stakeholders may participate in either or both regions' regional transmission planning processes to provide their input and feedback

regarding the interregional coordination between the SCRTP and the SERTP.