

Intersection of PJM Proposal and FERC NOPR

- Key area of overlap: Long-term scenario planning
 - FERC − 20-year/3-year cycle proposed; PJM − 15-year
 - Identify multiple factors influencing selected scenarios:
 - "Scenario Parameters" including generation and load
 - "Scenario Drivers" include retirements, extreme conditions, state and federal policies
- CAISO 20-year plan as one recent example

Benefits and Other Transmission Planning Avenues

- Benefits used for selection of projects left open
 - Which benefits would be assessed? FERC identifies a list but proposes allowing regions to select their own.
 - Would benefits be reflected in eventual cost allocation?
- Interaction with other types of planning
 - Economic and reliability would not change under NOPR
 - Network upgrades could be included under certain circumstances
 - "Right-sizing" of local transmission with regional plan

State role would be significant under NOPR

- NOPR would create substantial state role on cost allocation – both ex ante and ex post frameworks
 - Major question of how to handle failure to agree
- Although a State Agreement Approach is not mandated, NOPR looks to it as an example
- Should states (or interconnection customers) be able to fund incremental upgrades in regional plan?

Grid-Enhancing Technologies and ROFRs

- Under NOPR, transmission providers would have to consider dynamic line rating and power flow controls in regional planning.
- NOPR proposes to allow Federal ROFRs where joint ownership is allowed – impact on when and how competitive processes are used in transmission selection.