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December 7, 2007

VIA E-FILING

Hon. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE Black Hills Power, Inc., et al.
Order No. 890 Attachment K Compliance Filing
Docket No. OA07-_____

Dear Ms. Bose:

Black Hills Power, Inc. (“Black Hills Power”), on behalf of itself, Basin Electric Power Cooperative (“Basin Electric”), and Powder River Energy Corporation (collectively, the “Transmission Providers”), submits for filing with the Federal Energy Regulatory Commission (“FERC”) in accordance with Order No. 890¹ a proposed transmission planning process under Attachment K to the Transmission Providers’ joint open access transmission tariff (“Joint Tariff”) on file with FERC.²

Under the Joint Tariff, the Transmission Providers provide open access transmission service on their combined transmission systems located in the Western Interconnection and on an AC/DC/AC tie facility at Rapid City, South Dakota, that is owned by Black Hills Power and Basin Electric. Consistent with FERC’s directions in Order No. 890, the Transmission Providers have adopted a transmission planning process which they have memorialized in a proposed Attachment K to the Joint Tariff. Black Hills Power respectfully submits Attachment K to the Joint Tariff pursuant to Order No. 890, PP 140 and 437, and FERC’s notice extending the deadline for submission of Attachment K.³

1. Preventing Undue Discrimination and Preference in Transmission Service, Order No. 890, 72 FR 12266 (March 15, 2007), FERC Stats. & Regs. ¶ 31,241 (2007), *reh’g pending* (“Order No. 890”).

2. The Joint Tariff is designated as Black Hills Power, Inc., FERC Electric Tariff First Revised Volume No. 4.

3. Preventing Undue Discrimination and Preference in Transmission Service, 120 FERC ¶ 61,103 (2007)

SATISFACTION OF FERC'S PLANNING PRINCIPLES

The Transmission Providers' proposed transmission planning process under Attachment K satisfies the nine planning principles that FERC adopted in Order No. 890.⁴ Black Hills Power provides the following brief overview of how the Transmission Providers' proposed Attachment K satisfies each principle.

A. Principle 1: Coordination. Principle 1 requires transmission providers to meet with transmission customers and interconnected neighbors to develop a transmission plan on a non-discriminatory basis. Order No. 890 at P 451. Proposed Attachment K provides that the Transmission Providers will undertake several steps in the transmission planning process to ensure that transmission system planning is conducted on a coordinated basis. Attachment K at § 2.2. Moreover, Transmission Providers will create a stand alone advisory committee called the "Transmission Coordination and Planning Committee" ("TCPC"), which will provide an open transparent forum through which stakeholders can comment and provide advice to the Transmission Providers during all stages of the transmission planning process.

B. Principle 2: Openness. Principle 2 requires transmission providers to conduct the overall transmission planning process in the open without excluding any stakeholders. Order No. 890 at P 460. Proposed Attachment K specifies how information will be exchanged in a fair and open basis during the course of the transmission planning process, subject only to reasonable limitations on the publication or exchange of confidential energy infrastructure information and market sensitive or commercially-sensitive data. Attachment K at § 2.3. The transmission planning process will be open to all stakeholders through the TCPC. Stakeholders will have the opportunity to review and comment on the transmission plan throughout the entire development process, from data collection to report writing.

C. Principle 3: Transparency. Principle 3 requires transmission providers to conduct the overall transmission planning process on a transparent basis by disclosing to all customers and other stakeholders the basic criteria, assumptions, and data used in preparing transmission system plans. Order No. 890 at P 471. Proposed Attachment K specifies that Transmission Providers will maintain a "Transmission Planning" folder on the publicly-accessible portion of OASIS which will contain extensive information about the transmission planning process. Attachment K at § 2.4. Moreover, the TCPC process will give stakeholders full opportunity to review, discuss, comment, and provide other input on the Transmission Providers' assumptions, study plan, scenarios, methodologies, criteria, and other planning-related items throughout the course of the transmission planning process.

D. Principle 4: Information Exchange. Principle 4 requires transmission providers to develop a schedule and format for the submission of information and the development of a draft plan that provides sufficient time for participants to review and comment before completing a

4. Order No. 890 at PP 444-561.

final transmission plan. Order No. 890 at P 486. Proposed Attachment K specifies a process under which Transmission Providers will exchange information with customers and stakeholders and provide the opportunity for input and comment on draft plans throughout the course of the transmission planning process. Attachment K at § 2.1.

E. Principle 5: Comparability. Principle 5 requires transmission providers to develop transmission system plans that meet the specific service requests of their transmission customers and otherwise treats similarly-situated customers comparably in transmission system planning. Order No. 890 at P 494. Proposed Attachment K specifies measures with respect to cost allocation and non-discrimination to ensure that the planning process treats customers in a comparable manner. All valid customer data will be included and equally considered in the database used in the reliability assessment to help ensure that all customers are treated in a comparable and non-discriminatory manner.

F. Principle 6: Dispute Resolution. Principle 6 requires transmission providers to propose a dispute resolution process as part of the transmission planning process. Order No. 890 at P 501. Proposed Attachment K specifies a dispute resolution process that employs informal measures and mediation to resolve disputes. Attachment K at § 2.7.

G. Principle 7: Regional Participation. Principle 7 requires transmission providers to coordinate their transmission planning efforts with interconnected systems. Order No. 890 at P 523. The planning process under proposed Attachment K will be conducted on a regional and subregional basis. Transmission Providers will share planning data and assumptions with interconnected transmission systems, sub-regions, and regional entities as appropriate.

H. Principle 8: Economic Planning Studies. Principle 8 requires transmission providers to prepare economic planning studies as part of the transmission planning process. Order No. 890 at P 542. Proposed Attachment K provides an economic planning study process as part of the regional transmission planning process. Attachment K at § 2.6. Where it is appropriate to conduct an economic planning study, such study will be conducted in a manner that is open and coordinated with the affected stakeholders and the TCPC.

I. Principle 9: Cost Allocation for New Projects. Principle 9 requires transmission providers to develop cost allocation principles to address the recovery of costs associated with new transmission projects. Order No. 890 at P 537. Proposed Attachment K identifies a set of cost allocation principles consistent with FERC's cost allocation principles. Attachment K at § 2.5.

COMPLIANCE WITH COMMISSION FILING REQUIREMENTS

Black Hills Power, on behalf of the Transmission Providers, provides the following information in compliance with the Commission's requirements under Part 35 of its regulations:

A. Documents Submitted

For its Order No. 890 Attachment K compliance filing, Black Hills Power submits this transmittal letter and proposed Joint Tariff Attachment K in clean and blacklined formats.

B. Communications

Black Hills Power requests that communications regarding this filing be provided to the following:

For Black Hills Power, Inc.

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C. Compliance with Order No. 614

Black Hills Power has designated Joint Tariff Attachment K in accordance with the rate schedule designation requirements of Order 614.

D. Effective Date and Waiver

Black Hills Power requests that proposed Joint Tariff Attachment K be accepted effective December 8, 2007. Black Hills Power requests waiver of FERC's notice requirements to the extent necessary to permit a December 8th effective date.

CONCLUSION

For the foregoing reasons, Black Hills Power, on behalf of the Transmission Providers, requests FERC to accept proposed Attachment K of the Transmission Providers' Joint Tariff Attachment C effective as of December 8, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Griffen". The signature is stylized and includes a large, circular flourish at the end.

Michael C. Griffen
Attorney for Black Hills Power, Inc.,
on behalf of Black Hills Power, Inc., Basin Electric
Power Cooperative, and Powder River Energy Corporation

Enclosures

ATTACHMENT A

**Black Hills Power, Inc.
Basin Electric Power Cooperative
Powder River Energy Corporation**

Joint Tariff Attachment K

Clean Version

Attachment K
Transmission Planning Process

Attachment K

Transmission Planning Process

Preamble

In accordance with the Commission's regulations, the Transmission Provider planning process is performed on a local, sub-regional and regional basis. Section 2 of this Attachment K addresses the Local Planning Process. Sections 3 and 4 of this Attachment K address the Transmission Provider's sub-regional and regional planning coordination efforts and responsibilities. Greater detail with respect to the Transmission Provider's sub-regional and regional planning efforts is also contained within the separate agreements and business practices of CCPG, WestConnect, NTTG and the WECC.

Definitions

- 1.1. **LTP:** Local Transmission Plan is the transmission plan of the Transmission Provider that identifies the upgrades and other investments to the Transmission System or demand response necessary to reliably satisfy, over the planning horizon, Network Customers' resource and load growth expectations for designated Network Load; Transmission Provider's resource and load growth expectations for Native Load Customers; Transmission Provider's obligations pursuant to grandfathered, non-OATT agreements; and the Transmission Provider's Point-to-Point customers' projected service needs including obligations for rollover rights.
- 1.2. **NTTG:** Shall mean Northern Tier Transmission Group or its successor organization.
- 1.3. **CCPG:** Shall mean Colorado Coordinated Planning Group or its successor organization.
- 1.4. **WestConnect:** Shall mean the WestConnect Sub-regional Transmission group or its successor organization.
- 1.5. **Stakeholder Meeting:** Meetings periodically held by the Transmission Provider for the Purpose of soliciting input from affected stakeholders on the Transmission Provider's LTP.
- 1.6. **TEPPC:** Shall mean Transmission Expansion Policy and Planning Committee or its successor committee with WECC.

- 1.7. **TCPC:** Shall mean the Transmission Providers Transmission Coordination and Planning Committee which is a stand-alone advisory committee comprised of eligible stakeholders who will provide input to the Transmission Providers Local Transmission Plan.
- 1.8. **WECC:** Shall mean Western Electricity Coordinating Council or its successor organization.

2. Local Planning Process

2.1. Preparation of a LTP

- 2.1.1 The Transmission Provider shall prepare, with the input of interested stakeholders, one LTP every year. The preparation of the LTP shall be done in accordance with the general policies, procedures, and principles set forth in this Attachment K.
- 2.1.2 The Transmission Provider will establish a process by which stakeholders can discuss, question, or propose alternatives for input assumptions and upgrades identified by the Transmission Provider. The Transmission Provider shall consider information obtained from stakeholders for future planning cycles. The Transmission Provider may, following Stakeholder input, also include results of completed Economic Studies.
- 2.1.3 The Transmission Provider shall use a ten (10) year or other applicable planning horizon for the LTP. The transmission planning process shall use reliability criteria established by the Transmission Provider, the WECC, the NERC and the FERC.
- 2.1.4 The LTP on its own does not effectuate any transmission service requests. Transmission Service Requests must be made in accordance with the procedures set forth in Part II of the OATT and posted on the Transmission Provider's OASIS. Similarly, Network Customers must submit Network Resource and load additions or removals pursuant to the process described in Part III of the OATT.

- 2.1.5 The Transmission Provider shall take the LTP into consideration, as appropriate when preparing generation interconnect, transmission service and economic studies. The Transmission Provider shall take the generation interconnect, transmission service and economic study results into consideration as appropriate when preparing the LTP.
- 2.1.6 The Transmission Provider shall prepare and develop the LTP using an open and coordinated process that includes input from interested stakeholders as defined in Section 2.2.3. Stakeholder input will occur at various phases throughout the study process consistent with the principles, practices, policy and procedures set forth in this Attachment K. The Transmission Provider, with interested stakeholder input, shall: (1) determine the Study Plan, define scenarios and develop base cases related to the LTP; (2) perform the Technical Study; (3) determine the preliminary LTP, based on the data produced during the Technical Study and if applicable, include timely submitted Economic Study Request results; and (4) report study results and the LTP to stakeholders and Affected Parties.
- 2.1.7 Limitations on Disclosure: While the Transmission Provider's LTP planning process will be conducted in the most open manner possible, the Transmission Provider has an obligation to protect sensitive information such as, but not limited to, Critical Energy Information and the proprietary materials of third parties. Nothing in this Attachment K shall be construed as compelling the Transmission Provider to disclose materials in contravention of any applicable regulation, contractual arrangement, or lawful order unless otherwise ordered by a governmental agency of competent jurisdiction. the Transmission Provider may employ mechanisms such as confidentiality agreements, protective orders, or waivers to facilitate the exchange of sensitive information where appropriate and available.

2.1.8 The Transmission Provider will adhere to all applicable laws and regulations in preparing the LTP, including but not limited to Critical Energy Infrastructure Information (CEII). Any stakeholder or Transmission Provider participating in the planning process must adhere to the Commission's guidelines concerning CEII as set out in the Commission's regulations, Order Nos. 683 and 683-A (or and successor thereto). Additional information concerning CEII, including a summary list of data that is determined by the supplying party to be deemed CEII, shall be posted on the Transmission Providers' OASIS.

2.2. Coordination

2.2.1 LTP Study Cycle: the Transmission Provider shall prepare an LTP during a four (4) quarter study cycle.

2.2.2 LTP Sequence of Events: the Transmission Provider shall use the following timeline in preparing its LTP.

2.2.2.1 Quarter 1: Data Collection, Study Scope and Scenario Development

2.2.2.1.1 The Transmission Provider will gather: (1) Network Customers' projected loads and resources, and load growth expectations (based on annual updates under Part III of the Tariff); (2) Transmission Provider's projected loads and resource needs for its Native Load Customers; (3) Point-to-Point Customer's projections for long-term (greater than 1 year) needs at each receipt and delivery point (based on information submitted by Eligible Customers to the Transmission Provider) including projections of rollover rights; and (4) information from all Transmission Customers and the Transmission Provider on behalf of Native Load Customers concerning existing and planned demand resources and their impact on demand and peak demand. The Transmission Provider shall take into consideration, to the

extent known or which may be obtained from its Transmission Customers, obligations that will either commence or terminate during the applicable study window. Customer Economic Study Requests will also be submitted to the Transmission Provider during this quarter. The Transmission Provider will, with stakeholder input, define the proposed LTP study scope, objectives, scenarios to be considered in development of the LTP. The Transmission Provider shall post the official timelines for data submittals on its OASIS.

2.2.2.1.2 The Transmission Provider will have a TCPC meeting during the first quarter to accept stakeholder comments to the Local Transmission Plan. The Transmission Provider will, with stakeholder input, finalize and post on the OASIS the basic methodology, planning criteria, assumptions and processes the Transmission Provider will use to prepare the LTP. As part of the TCPC meeting, the Transmission Provider will finalize study objectives, scenarios to be studied, discuss data collected, adequacy of the data, the need for any additional data and discuss applicable Economic Study Requests.

2.2.2.2 Quarter 2-3: Technical Study

2.2.2.2.1 The Transmission Provider will develop base cases that include load and resource data to represent the defined scenarios.

2.2.2.2.2 The Transmission Provider will conduct a combination of powerflow, transient stability studies, post transient power flow or other studies deemed necessary to properly analyze the transmission system.

2.2.2.2.3 The Transmission Provider will consider transmission and non-transmission solutions to mitigate system performance that does not meet reliability criteria. The Transmission Provider may consider the results from prior applicable Economic Studies.

2.2.2.2.4 The Transmission Provider may elect to post interim iterations of the draft plan or preliminary technical study results, and solicit comments prior to the end of the applicable quarter. The Transmission Provider will seek interested stakeholder input regarding advantages and disadvantages associated with proposed solutions in the transmission plan or technical study.

2.2.2.3 Quarter 4: Decision and Reporting

2.2.2.3.1 The Transmission Provider will solicit stakeholder input when determining selection criteria and weighting to be used in determining the best transmission or non-transmission solution identified in the draft LTP. Advantages and disadvantages to each solution will also be considered.

2.2.2.3.2 The Transmission Provider will prepare and publish a draft LTP report on its OASIS and solicit input from all stakeholders.

2.2.2.3.3 Using data and information from the Technical Study, and considering stakeholder input, the Transmission Provider will define its ten (10) year LTP.

2.2.2.3.4 The final LTP report will be posted on the Transmission Provider's OASIS and provided to applicable sub-regional and regional entities conducting similar planning efforts, interested stakeholders, and the owners and operators of the neighboring interconnected transmission systems.

2.2.2.3.5 The responsibility for the LTP shall remain with the Transmission Provider who may accept or reject in whole or in part, the comments of any stakeholder unless prohibited by applicable law or regulation.

2.2.3 Stakeholder Meetings: The Transmission Provider shall establish the TCPC to be used as the forum for stakeholder input throughout the study cycle described in Section 2.2.1. TCPC membership and meetings shall be open to all stakeholders, including but not limited to Eligible Customers, other transmission providers and federal and state commissions. The Transmission Provider shall utilize quarterly scheduled TCPC meetings to solicit, obtain, and coordinate the input of interested stakeholders throughout the Local Planning Process. Notice of TCPC meetings shall be posted on the Transmission Provider's OASIS with fifteen (15) business days prior notice. A list of participants or members will be maintained and will receive email notifications for upcoming meetings. The location of the meeting shall be selected by the Transmission Provider. The Transmission Provider shall provide for alternate means of participation, to the extent practical and economical, such as teleconference, web conference or other similar means. Instructions for participation in TCPC meetings shall be posted and maintained on the Transmission Provider's OASIS. The TCPC Charter is further described in Attachment K Business Practices posted on the Transmission Provider's OASIS website.

2.2.4 In addition to stakeholder input noted in Section 2.2.3 above, at each TCPC meeting, the Transmission Provider will: (1) discuss the status of the local transmission planning process, (2) summarize substantive study results if available, (3) present drafts of documents, and (4) receive stakeholder comments on the overall transmission plan.

2.2.5 The Transmission Provider shall post and maintain on its OASIS: (1) instructions, meeting notices points of contact, and other information

necessary to participate in the TCPC meeting, or other means established for the purpose of soliciting the input of or coordinating with interested stakeholders; (2) Written comments received from interested stakeholders, to the extent such comments are not confidential or subject to privilege; and (3) any draft LTP or any other documents the Transmission Provider deems necessary to promote coordination in the LTP study process. A complete list of OASIS posting requirements is defined in Section 2.4 of Attachment K.

2.3. **Information Exchange**

2.3.1 Types of Forecast Data: Transmission Customers shall submit annually information on projected load and resources (or sources of electrical supply) as required to facilitate the LTP planning process or to fulfill OATT, regulatory, legal or other Transmission Provider obligations. To facilitate the LTP, the Transmission Customer shall provide the Transmission Provider the following types of data during the first quarter of every year per the schedule posted on the Transmission Providers' OASIS:

2.3.1.1 Historical Data: monthly historical energy, peak load and minimum load data for the prior calendar year and the historical energy, peak load and minimum load data for all months of the current year as it becomes available.

2.3.1.2 Load Forecast Data: Network Transmission Customer shall provide their ten (10) year monthly energy, peak load and resource and minimum load and resource forecast data.

2.3.1.3 Point-to-point and other Transmission Customers: To maximize the effectiveness of the transmission planning process, it is essential that all other Transmission Customers provide their ten (10) year forecast of its projected use of rollover of existing reservations and any expected additional reservations. The forecast shall specify the Point of Receipt and Point of Delivery at the bust level.

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- 2.3.1.4 Generation Forecast Data: Transmission Customer shall provide data from their own generators including, but not limited to, technical engineering data for their generators and interconnection facilities, peak capability (MW) and expected maintenance schedule.
- 2.3.1.5 Demand Response Resource, Demand Reduction, Conservation and Demand-side Management: Transmission Customer shall provide demand response resource savings, conservation savings, and other customer load reduction alternatives that would reduce or alter the load of the Transmission Customer.
- 2.3.1.6 Interruptible and Other: Interruptible load tariff customers will be asked to supply a peak load forecast with and without the interruptible portion of the forecast data applied.
- 2.3.1.7 Other Supply Sources: Transmission Customer shall provide monthly energy and peak data for electrical supply sources not from Generators including, but not limited to, point of receipt and point of delivery.
- 2.3.2 Peak Load Forecast Temperature Adjustment: The Transmission Provider may request the temperature adjustment methodology to adjust the winter and summer peak load forecasts to an alternative (e.g., 1-in-2 ,1-in-10 and 1-in-20) probability assumption.
- 2.3.3 Additional Information: The Transmission Customer shall also provide, upon reasonable request, to the Transmission Provider the following information or other information as requested by the Transmission Provider:
- 2.3.3.1 Discussion of reasons for significant increase or decreases in load or generation forecast.
- 2.3.3.2 Source and vintage of load forecast and generation resource information.
- 2.3.3.3 Interruptible tariff loads and controllable demand response.
- 2.3.3.4 Weather station assumptions associated with load forecasts.

- 2.3.4 Eligible Customers shall submit Economic Study Requests no later than the date shown on the official timeline posted on the Transmission Provider's OASIS. Requests received after this time will be considered in the following annual study cycle.
- 2.3.5 Transmission Customer Obligation: Customers shall provide the Transmission Provider with generation, energy, peak and minimum load forecast, and demand response resources to the maximum extent practical and consistent with protection of proprietary information.
- 2.3.5.1 Customers shall also provide timely written notice (including email) of material changes to information previously provided relating to its load, resources, or other aspects of its facility or operations affecting the Transmission Provider's ability to provide service.
- 2.3.5.2 If any customer or stakeholder fails to provide data or otherwise participate as required by this Attachment K, the Transmission Provider cannot effectively include future needs in the Transmission Provider's Local Transmission Plan planning obligations. If any Network Customer fails to provide data or otherwise participate as required by this Attachment K, the Transmission Provider shall plan the system based on the most recent load and resource data received.
- 2.3.6 Comparability of Data: The same type of data request shall be sent by the Transmission Provider to all customers within the Transmission Provider's respective area of responsibility. The Transmission Provider shall include all valid data, along with appropriate comments on data received from Transmission Customers.
- 2.3.7 Confidentiality: Individual customer data will be treated as confidential and will be aggregated with other customer data for planning and reporting purposes. The data received will be used to develop the Transmission Provider's LTP and for reporting purposes.

- 2.3.8 Stakeholders and the Transmission Provider shall identify confidential documents or market sensitive information supplied during the transmission planning process. Any stakeholder or transmission provider seeking access to such confidential information must agree to adhere to the terms of a confidentiality agreement and have a “need to know”. The form of the Transmission Provider’s confidentiality agreement shall be developed initially by the Transmission Provider and posted on the OASIS. Thereafter, stakeholders shall have an opportunity to submit comments on the form of confidentiality agreement.
- 2.3.9 Market sensitive and commercial specific or other data, identified as such by the Transmission Customer will be considered confidential. Confidential information shall be disclosed in compliance with Standards of Conduct, and only to those participants in the planning process that require such information and that execute the confidentiality agreement; provided, however, any such information may be supplied to (i) federal, state or local regulatory authorities that request such information and protect such information subject to non-disclosure regulations, or (ii) upon order of a court of competent jurisdiction.
- 2.3.10 Schedule of Collection: The Transmission Provider will submit a request for forecast data annually, but no later than close of business Friday of the second full week of January, and merge it into the annual LTP study schedule as posted on OASIS. Similarly, the Transmission Provider shall post on the OASIS instructions, procedures and requirements for the submission of data.

2.4. **Transparency**

2.4.1 OASIS Requirements

- 2.4.1.1 The Transmission provider shall maintain a “Transmission Planning” folder on the publicly accessible portion of its OASIS to distribute information related to this Attachment K. Business

Practices and other information pertaining to the LTP will also be posted in the “Transmission Planning” folder.

2.4.1.2 The Transmission Provider shall maintain in the “Transmission Planning” folder on the publicly accessible portion of OASIS a subscription service or “How-To-Contact-Us” folder whereby any person may contact the Transmission Provider to receive e-mail notices, materials related to the LTP process or provide comments to the local transmission planning process.

2.4.1.3 Content of OASIS Postings. The Transmission Provider shall post in the “Transmission Planning” folder on its OASIS:

2.4.1.3.1 Transmission planning business practices along with the procedures for modifying the business practices;

2.4.1.3.2 Study cycle timeline and data submittal schedule;

2.4.1.3.3 Each Economic Study Request, and any response from the Transmission Provider;

2.4.1.3.4 A summary of information discussed at each TCPC meeting, or other similar meeting related to transmission planning;

2.4.1.3.5 In advance of its discussion at any TCPC meeting, all materials to be discussed;

2.4.1.3.6 Written comments submitted in relation to the Local Transmission Plan;

2.4.1.3.7 The draft, interim (if any), and final versions of the current Local Transmission Plan and non-confidential supporting documents;

2.4.1.3.8 The final version of all completed Local Transmission Plans for previous study periods;

2.4.1.3.9 Economic Study results.

2.4.1.3.10 Aggregated load forecasts representing the Transmission Provider's transmission system;

2.4.1.3.11 Information regarding the status or material change of upgrades identified in the LTP.

2.4.1.3.12 Material database changes noted in Section 2.4.2 below.

2.4.1.3.13 Summary list of Critical Energy Infrastructure Information submitted during the planning process; and

2.4.1.3.14 Key information concerning the NTTG, CCPG or WestConnect sub-regional planning process.

2.4.2 Database Access and Changes. A stakeholder may receive access from the Transmission Provider to the database and all changes to the database used to prepare the Local Transmission Plan according to the database access rules established by the WECC and upon certification to the Transmission Provider that the stakeholder is permitted to access such database. Unless expressly ordered to do so by a court of competent jurisdiction or regulatory agency, the Transmission Provider has no obligation to disclose database information to any stakeholder that does not qualify for access. Material changes or updates to the database used for the LTP, and reason for the changes will be posted on the Transmission Provider OASIS website.

2.5. **Cost Allocation**

2.5.1 Cost allocation principles expressed here do not supersede cost obligations as determined by other parts of the Tariff, which include but are not limited to transmission service requests, generation interconnection requests, Network Upgrades or Direct Assigned Facilities. Nothing contained in this Attachment K shall relieve or modify the obligations of the Transmission Provider or Transmission Customer Pursuant to the Tariff.

2.5.2 Cost Allocation Principles

2.5.2.1 For new local projects that do not fit into the Transmission Provider's OATT cost allocation principles, the Transmission

Provider will follow its “Local Cost Allocation Methodology” posted on the OASIS under the “Transmission Planning” folder unless a mutually agreeable cost allocation method can be reached between the Transmission Provider and the project participants or sponsors.

2.5.2.2 The costs of upgrades or other transmission investments subject to an existing transmission service request pursuant to the Tariff are evaluated in the context of that transmission service request.

2.5.2.3 To the extent possible, the Transmission Provider shall use mechanisms such as the TCPC or similar processes to work collaboratively with Transmission Customers and stakeholders regarding the allocation of costs for projects whose costs are not otherwise addressed under the OATT.

2.5.2.4 The Commission’s regulations, policy statements and precedent on transmission pricing shall be followed.

2.5.2.5 The cost allocation for sub-regional projects will be allocated consistent with the cost allocation principles of the applicable sub-regional entity, that is, WestConnect or NTTG. These Cost Allocation Principles can be found at www.westconnect.com and www.nttg.biz.

2.6. **Economic Planning Studies**

2.6.1 As part of the study cycle described in Section 2.2.2 above, the Transmission Provider will review Economic Study Requests. An Economic Study Request involves an assessment to determine whether transmission upgrades can reduce the overall cost of service to Native Load Customers and the load of other customers taking service under the Tariff. The Transmission Provider currently does not separately conduct economic planning studies and does not have the individual capability to conduct economic analyses, and thus, in the event of a request for an economic

study, may contract with a qualified third party of its choosing to perform such work. The Transmission Provider will coordinate with the TCPC during the annual study cycle to identify and prioritize all Economic Study Requests and perform an assessment to determine if the Economic Study Request would reduce the overall cost of service to Native Load Customers and the load of other customers taking service under the Tariff.

- 2.6.2 An Eligible Customer may make an Economic Study Request by completing the Economic Study Request form located on the Transmission Providers OASIS within the “Transmission Planning” folder. Study requests are due to the Transmission Provider per the official timeline as posted on the Transmission Provider’s OASIS.
- 2.6.3 The Transmission Provider will coordinate with the TCPC to identify similar submitted Economic Study Requests which could be clustered into a single Economic Study.
- 2.6.4 The Transmission Provider or its Agent will study up to one (1) high priority Local Transmission Provider Economic Study annually.
- 2.6.5 Classification of Requests. The Transmission Provider, with input from the TCPC, shall classify a request for Economic Planning Studies as a Local Transmission Provider Economic Planning Request, Sub-Regional Economic Planning Request, or Regional Economic Planning Request.
- 2.6.5.1 A study request that is confined to the Transmission provider’s system and does not materially affect the interconnected transmission system, and remedies are confined to the local transmission system, will be considered a Local Transmission Provider Economic Planning Request and studied by the Transmission Provider or its Agent.
- 2.6.5.2 All other Economic Study Requests will be deemed sub-regional or regional requests and be forwarded to the appropriate sub-regional entity or a third party for study.

- 2.6.5.3 Any Economic Study Request deemed to be a sub-regional or regional request will be performed according to the appropriate sub-regional or regional study cycle.
- 2.6.6 Priority of Requests: The Transmission Provider shall identify up to one (1) high priority Local Transmission Provider Planning Request for study for the purpose of alleviating congestion through the integration of new supply and demand resource into the local transmission grid or expanding the local transmission to connect major new areas of generation resource.
- 2.6.6.1 Sponsors of Economic Planning studies not prioritized as a high priority study may re-submit the Economic Study Request for study consideration in the next economic planning cycle or may fund the study as an Additional Economic Study.
- 2.6.7 Economic Study Process: The Local Transmission Provider or its Agent shall study valid requests for Economic Planning Studies in a manner that is open, transparent and coordinated with stakeholders utilizing the TCPC or other method established by the Transmission Provider. The economic study timeline and process is further defined in Attachment K Business Practices located on the Transmission Providers OASIS.
- 2.6.8 Economic Study Contents: Local Transmission Provider Economic Studies shall include, but not be limited to: the location and magnitude of congestion, possible congestion remedies and the cost of relieving congestion.
- 2.6.9 Customer Obligation to Share Data: Transmission Customers requesting an economic Study shall, upon request of the Transmission Provider, supply all relevant information necessary to perform the economic study. If the Transmission Customer fails to provide the information requested, the Transmission Provider shall have no obligation to complete the study.
- 2.6.10 Additional Economic Studies: Economic study requests that are not prioritized as the highest priority local study shall be referred to as

Additional Studies. The Transmission Customer or sponsor shall pay for actual costs to perform Additional Studies. The process, procedure, and methodology for processing Additional Economic Studies is further defined in Attachment K Business Practices located on the Transmission Providers OASIS.

- 2.6.11 Recovery of Planning Costs: The costs to complete the high priority economic studies shall be recovered through the Transmission Provider's transmission rate base. The cost for Additional Economic Studies shall be borne by the sponsor of the Economic Study Request.

2.7. Dispute Resolution

- 2.7.1 Process: If a dispute arises from the Transmission Providers Local System Planning process, the Dispute Resolution process set forth below will be followed.

- 2.7.2 The use of this Dispute Resolution process will be limited to specific issues arising from the Transmission Providers local transmission system planning.

- 2.7.3 Before Eligible Customers, stakeholders or other transmission providers initiate a hotline or formal complaint with the FERC, the Parties shall complete the process set forth below:

- 2.7.3.1 Step 1: The dispute resolution process shall be initiated by submittal of a dispute letter outlining the complaint to the Transmission Provider. Upon receipt of a dispute letter, the Transmission Provider shall set a meeting between the senior representatives for each of the disputing parties, at a time and place convenient to such parties, within 30 calendar days after receipt of the dispute letter. The senior representatives shall engage in direct dialogue, exchange information as necessary, and negotiate in good faith to resolve the dispute. Any other stakeholder that believes it has an interest in the dispute may participate. The senior representatives will continue to negotiate until such time as (i) the dispute letter is withdrawn; (ii)

the parties agree to a mutually acceptable resolution of the disputed matter, or (iii) after 60 calendar days, the parties remain at an impasse.

2.7.3.2 Step 2: If Step 1 is unsuccessful at reaching a consensus agreement to resolve the dispute, the next step shall be mediation, as defined in Appendix C of the Western Electricity Coordinating Council (WECC) bylaws.

2.7.3.3 Step 3: If Step 2 is unsuccessful at reaching mutual agreement among parties to the dispute, the next step shall be binding arbitration, as defined in Appendix C of the Western Electricity Coordinating Council (WECC) bylaws.

2.7.3.4 Step 4: All negotiations and proceedings pursuant to this process are confidential and shall be treated as compromise and settlement negotiations for purposes of applicable rules of evidence and any additional confidentiality protections provided by applicable law.

2.7.3.5 The basis of the dispute and final non-confidential decisions will be made available to stakeholders upon request.

2.7.3.6 Disputes over any matter shall be communicated in a timely manner; provided, however, in no case shall a dispute be raised more than 30 calendar days after a decision is made in the study process or the posting of a milestone document, whichever is earlier.

2.8. **Transmission Business Practices**

2.8.1 The Transmission Provider has posted on its OATT website (<http://www.oatioasis.com/bhbe/>): (1) the “Attachment K Business Practice” which provides additional information regarding the implementation of this Attachment K; and (2) the “Transmission Provider Methodology Criteria and Process Business Practice” which provides additional information related to Principle 4, Transparency.

3. Sub-regional Planning Process

The Transmission Provider's transmission system is located in primarily in Northeast Wyoming and Western South Dakota with interconnections with neighboring transmission systems in both Wyoming and Nebraska. The neighboring transmission systems are owned and operated by entities which are members of either the Northern Tier Transmission Group (NTTG) or the Colorado Coordinated Planning Group (CCPG) and WestConnect. Specifically, the Transmission Provider transmission system interconnects with the PacifiCorp transmission at or near the Wyodak, Carr Draw and Antelope Mine Tap substations. PacifiCorp is a member of NTTG. Additionally, the Transmission Provider transmission system interconnects with Western Area Power Administration at the Stegall substation. Western Area Power Administration is a member of both CCPG and WestConnect. Due to the importance of coordinating transmission planning activities with neighboring transmission systems in a sub-regional context, the Transmission Provider will participate in the NTTG, CCPG and WestConnect sub-regional planning groups.

3.1. Northern Tier Transmission Group

3.1.1 The Transmission Provider is a member of the NTTG Planning Committee:

3.1.1.1 The Transmission Provider will use the NTTG process for sub-regional planning, coordination with adjacent sub-regional groups and other planning entities, and proposals to WECC TEPPC for regional planning. Participants in the NTTG Planning Committee have committed to working with one another and with affected stakeholders and state officials, to increase the efficient use of the grid and to develop the infrastructure needed to deliver new renewable and thermal power resources to consumers. The Transmission Provider has committed to support the sub-regional planning process through participation in the NTTG Planning Committee and providing employee support of the NTTG planning efforts. Stakeholders may participate in NTTG's activities and

programs at their discretion. Eligible Customers and stakeholders may participate directly in the NTTG processes or participate indirectly through the Transmission Provider via development of the LTP. Additional information, including a map containing the current geographic footprint of NTTG can be found on the NTTG website at <http://www/nttg/biz>.

3.1.2 The Transmission Provider Coordination with NTTG:

3.1.2.1 The Transmission Provider will collect customer data and consolidate load service and other transmission service requests through the local planning process described in Section 2 above. The Transmission Provider will provide NTTG with its LTP incorporating all of the transmission service forecasts for its transmission system. NTTG will conduct its planning process to identify needs; least cost expansion project alternatives, technical benefits and projected costs. NTTG will select beneficial expansion sub-regional projects and address cost allocation among participating Transmission Providers. Specifics of the NTTG planning process are available on NTTG's website at www.nttg.biz.

3.1.3 Study Process:

3.1.3.1 The Transmission Provider will support the NTTG processes and will participate in the NTTG Planning Committee to establish a coordinated sub-regional study process, involving both economic and reliability components, as outlined in the NTTG Planning Committee charter, which is approved by the NTTG Steering Committee. The current NTTG Planning Committee charter, planning cycle and meeting notices are available on NTTG's website at www.nttg.biz. Results of sub-regional and regional planning efforts will be considered in future transmission system planning cycles.

3.1.4 **Stakeholder Participation:**

3.1.4.1 Eligible Customers and stakeholders may participate in the NTTG sub-regional planning process pursuant to the requirements of NTTG. The NTTG Planning Committee is open to membership by the Transmission Providers, any providers of transmission services, any Eligible Customer, and any state utility commission. NTTG has developed rules governing access to, and disclosure of, sub-regional planning data by members. Members of NTTG are required to execute standard non-disclosure agreements before sub-regional transmission planning data are released.

3.1.4.2 Eligible Customers and stakeholders may comment on NTTG study criteria, assumptions, or results at their discretion either through direct participation in NTTG or by submitting comments to the Transmission Provider to be evaluated and consolidated with the Transmission Provider's comments on the sub-regional plan, criteria, and assumptions.

3.1.5 **Economic Congestion Studies:**

3.1.5.1 The Transmission Provider will participate in the NTTG processes to prioritize and complete up to two (2) sub-regional economic congestion studies per NTTG planning cycle, as outlined in NTTG's standardized process for congestion studies. The sub-regional economic congestion studies will address those requests submitted by Eligible Customers and stakeholders to member Transmission Providers that require analysis across multiple NTTG member transmission systems. NTTG may submit requests for regional economic congestion studies to the WECC TEPPC pursuant to NTTG developed processes.

3.1.5.2 Within each planning cycle, any Eligible Customer or stakeholder may request additional Economic Congestion Studies, or Economic

Congestion studies that were not prioritized for completion by NTTG, to be paid for at the sole expense of the requesting party. Such requests shall be made by the Eligible Customer or stakeholder to the Transmission Provider. The Transmission Provider will tender a study agreement that addresses, at a minimum, cost recovery for the Transmission Provider and schedule for completion.

3.1.6 Dispute Resolution:

3.1.6.1 The Transmission Provider will participate in the NTTG dispute resolution process to resolve disputes related to the integration of the Transmission Provider's local plan with the sub-regional Expansion Plan and associated cost allocation. The NTTG dispute resolution process may be initiated to enforce compliance with the NTTG study process, or to challenge a decision within a milestone document. Eligible Customers and stakeholders participating in the NTTG planning committee may also utilize the NTTG planning agreement dispute resolution process. Disputes over any matter shall be raised timely; provided, however, in no case shall a dispute be raised more than 30 days after a decision is made by the planning committee in study process or the posting of a milestone document, whichever is earlier.

3.1.7 Cost Allocation:

3.1.7.1 The Transmission Provider will support the NTTG to prepare and submit recommendations for cost allocation associated with the NTTG sub-regional plan to the NTTG Cost Allocation Committee and process, and ultimately the NTTG Steering Committee for approval. This Steering Committee approval will represent a non-binding sub-regional consensus of cost allocation formed with direct state commission involvement and support.

3.2. **Colorado Coordinated Planning Group**

3.2.1 **The Transmission Provider is an active participant of CCPG:**

3.2.1.1 CCPG is a joint, high voltage transmission planning forum for the purpose of assuring a high degree of reliability in the planning, development, and operation of the high voltage transmission system in the Rocky Mountain Region. The Transmission Provider attends and actively participates in CCPG meetings and activities. The CCPG footprint encompasses Colorado, Wyoming and Western South Dakota. Information on CCPG activities can be found on the CCPG website at <http://ccpg.basinelectric.com>. A link to the CCPG website can be found on the Transmission Provider OASIS under the Transmission Planning folder.

3.2.2 **The Transmission Provider Coordination with CCPG:**

3.2.2.1 The Transmission Provider will submit its transmission plans to CCPG as required for inclusion in CCPG's planning activities. Additionally, the Transmission Provider will support CCPG planning activities through development of study assumptions, supplying of system data, execution of studies when available, and review of study results and reports. The Transmission Provider actively participates in the CCPG transmission planning activities to ensure that the Transmission Provider data and assumptions are coordinated with the CCPG transmission plans and studies.

3.2.3 **Study Process:**

3.2.3.1 WestConnect will work with the CCPG and Southwest Area Transmission Planning Group ("SWAT") planning processes to develop the WestConnect Transmission Plan. The WestConnect Transmission Plan will be presented to the WestConnect Steering Committee for review and approval.

3.2.4 Stakeholder Participation:

3.2.4.1 All stakeholders may participate in the CCPG sub-regional planning process through attendance of CCPG meetings or input to the Transmission Providers. CCPG meetings are held three times per year and are open to any providers of transmission services, any Eligible Customer, any state utility commission and any interested party.

3.2.5 Cost Allocation:

3.2.5.1 WestConnect encourages, to the maximum extent possible, the use of open season solicitation, multi-party transmission ownership, and potential co-existence of both physical and financial transmission rights for transmission projects planned under the WestConnect processes.

3.3. WestConnect Sub-regional Transmission Planning

3.3.1 The Transmission Provider will support WestConnect Planning Activities

3.3.1.1 The WestConnect Regional Planning Work Group's (RPWG) goal is to promote effective transmission planning within the sub-region comprised of the WestConnect footprint. This is accomplished through coordination with CCPG, Southwest Area Transmission Planning Group (SWAT) and Sierra sub-regional planning groups. WestConnect's objective is to integrate the WestConnect participants transmission plans into a single ten-year regional transmission plan covering the WestConnect footprint. Information on the WestConnect planning process can be found on the WestConnect website at www.westconnect.com.

3.3.2 The Transmission Provider Coordination with WestConnect

3.3.2.1 The Transmission Provider will coordinate and actively participate in the WestConnect planning process by:

3.3.2.1.1 Coordinating, developing and updating common base cases to be used for all study efforts within the SWAT, CCPG and Sierra planning groups and ensuring that each plan adheres to the common methodology and format developed jointly by WestConnect sub-regional planning groups for this planning purpose.

3.3.2.1.2 Actively participating in the sub-regional planning processes including submitting its transmission plan to CCPG for review and comment and use within WestConnect's planning process.

3.3.2.1.3 Adhering to and supporting the jointly developed WestConnect-SWAT-CCPG Principals for Sub-Regional Transmission Planning.

3.3.3 Stakeholder Participation:

3.3.3.1 All stakeholders may participate in the WestConnect planning process through participation in the two public stakeholder meetings held each year or by providing input to the Transmission Provider for presentation to WestConnect.

3.3.4 Cost Allocation:

3.3.4.1 WestConnect encourages, to the maximum extent possible, the use of open season solicitation, multi-party transmission ownership, and potential co-existence of both physical and financial transmission rights for transmission projects planned under the WestConnect processes.

4. Regional Planning Process

4.1. The Transmission Provider is a member of WECC:

4.1.1 The Transmission Provider supports the work of WECC TEPPC. NTTG and WestConnect may utilize WECC TEPPC for consolidation and completion of congestion and economic studies, base cases, and other

regional planning. NTTG and WestConnect may coordinate with other neighboring sub-regional planning groups directly, through joint study teams, or through the regional process. Eligible Customers and stakeholders may participate directly in the WECC processes, pursuant to participation requirements defined by WECC TEPPC, or participate indirectly through the Transmission Provider via development of the Transmission System Plan or through sub-regional processes as outlined above in Section 3.

4.2. **The Transmission Provider Coordination with WECC TEPPC:**

4.2.1 The Transmission Provider will coordinate with WECC TEPPC for regional planning through its participation in NTTG and WestConnect. The Transmission Provider will also use NTTG and WestConnect to coordinate with neighboring sub-regional planning groups including the CAISO, NWPP and Columbia Grid. The goal of sub-regional coordination on a regional basis on behalf of the Transmission Provider is to (1) share system plans to ensure that they are simultaneously feasible and otherwise use consistent assumptions and data, and (2) identify system enhancements that could relieve congestion or integrate new resources.

4.3. **Study Process:**

4.3.1 The WECC TEPPC Transmission Planning Protocol will be available by document or link on the Transmission Providers' OASIS.

4.4. **Stakeholder Participation:**

4.4.1 Stakeholders have access to the regional planning process through NTTG's and WestConnect's public planning meetings, other sub-regional planning groups, and WECC at their discretion.

4.5. **Economic Congestion Studies:**

4.5.1 The Transmission Provider will support, directly and through its participation in NTTG and WestConnect, the WECC TEPPC processes to prioritize and complete regional economic congestion studies requested by

customers and stakeholders to each member transmission provider in each calendar year within the Western Electricity Coordinating Council's footprint as outlined in the standardized mechanism.

4.6. **Dispute Resolution:**

4.6.1 Regional dispute resolution will be pursuant to the process developed by WECC.

4.7. **Cost Allocation:**

4.7.1 A Western Interconnection regional cost allocation methodology does not exist; therefore cost allocations for regional transmission projects will be addressed on a case-by-case basis by parties participating in the project.

Joint Tariff Attachment K

Blackline Version

ATTACHMENT K
TRANSMISSION PLANNING PROCESS
[RESERVED]

Attachment K

Transmission Planning Process

Preamble

In accordance with the Commission's regulations, the Transmission Provider planning process is performed on a local, sub-regional and regional basis. Section 2 of this Attachment K addresses the Local Planning Process. Sections 3 and 4 of this Attachment K address the Transmission Provider's sub-regional and regional planning coordination efforts and responsibilities. Greater detail with respect to the Transmission Provider's sub-regional and regional planning efforts is also contained within the separate agreements and business practices of CCPG, WestConnect, NTTG and the WECC.

Definitions

- 1.1. **LTP:** Local Transmission Plan is the transmission plan of the Transmission Provider that identifies the upgrades and other investments to the Transmission System or demand response necessary to reliably satisfy, over the planning horizon, Network Customers' resource and load growth expectations for designated Network Load; Transmission Provider's resource and load growth expectations for Native Load Customers; Transmission Provider's obligations pursuant to grandfathered, non-OATT agreements; and the Transmission Provider's Point-to-Point customers' projected service needs including obligations for rollover rights.
- 1.2. **NTTG:** Shall mean Northern Tier Transmission Group or its successor organization.
- 1.3. **CCPG:** Shall mean Colorado Coordinated Planning Group or its successor organization.
- 1.4. **WestConnect:** Shall mean the WestConnect Sub-regional Transmission group or its successor organization.
- 1.5. **Stakeholder Meeting:** Meetings periodically held by the Transmission Provider for the Purpose of soliciting input from affected stakeholders on the Transmission Provider's LTP.
- 1.6. **TEPPC:** Shall mean Transmission Expansion Policy and Planning Committee or its successor committee with WECC.

- 1.7. TCPC: Shall mean the Transmission Providers Transmission Coordination and Planning Committee which is a stand-alone advisory committee comprised of eligible stakeholders who will provide input to the Transmission Providers Local Transmission Plan.
- 1.8. WECC: Shall mean Western Electricity Coordinating Council or its successor organization.

2. Local Planning Process

2.1. Preparation of a LTP

- 2.1.1 The Transmission Provider shall prepare, with the input of interested stakeholders, one LTP every year. The preparation of the LTP shall be done in accordance with the general policies, procedures, and principles set forth in this Attachment K.
- 2.1.2 The Transmission Provider will establish a process by which stakeholders can discuss, question, or propose alternatives for input assumptions and upgrades identified by the Transmission Provider. The Transmission Provider shall consider information obtained from stakeholders for future planning cycles. The Transmission Provider may, following Stakeholder input, also include results of completed Economic Studies.
- 2.1.3 The Transmission Provider shall use a ten (10) year or other applicable planning horizon for the LTP. The transmission planning process shall use reliability criteria established by the Transmission Provider, the WECC, the NERC and the FERC.
- 2.1.4 The LTP on its own does not effectuate any transmission service requests. Transmission Service Requests must be made in accordance with the procedures set forth in Part II of the OATT and posted on the Transmission Provider's OASIS. Similarly, Network Customers must submit Network Resource and load additions or removals pursuant to the process described in Part III of the OATT.

- 2.1.5 The Transmission Provider shall take the LTP into consideration, as appropriate when preparing generation interconnect, transmission service and economic studies. The Transmission Provider shall take the generation interconnect, transmission service and economic study results into consideration as appropriate when preparing the LTP.
- 2.1.6 The Transmission Provider shall prepare and develop the LTP using an open and coordinated process that includes input from interested stakeholders as defined in Section 2.2.3. Stakeholder input will occur at various phases throughout the study process consistent with the principles, practices, policy and procedures set forth in this Attachment K. The Transmission Provider, with interested stakeholder input, shall: (1) determine the Study Plan, define scenarios and develop base cases related to the LTP; (2) perform the Technical Study; (3) determine the preliminary LTP, based on the data produced during the Technical Study and if applicable, include timely submitted Economic Study Request results; and (4) report study results and the LTP to stakeholders and Affected Parties.
- 2.1.7 Limitations on Disclosure: While the Transmission Provider's LTP planning process will be conducted in the most open manner possible, the Transmission Provider has an obligation to protect sensitive information such as, but not limited to, Critical Energy Information and the proprietary materials of third parties. Nothing in this Attachment K shall be construed as compelling the Transmission Provider to disclose materials in contravention of any applicable regulation, contractual arrangement, or lawful order unless otherwise ordered by a governmental agency of competent jurisdiction. the Transmission Provider may employ mechanisms such as confidentiality agreements, protective orders, or waivers to facilitate the exchange of sensitive information where appropriate and available.

2.1.8 The Transmission Provider will adhere to all applicable laws and regulations in preparing the LTP, including but not limited to Critical Energy Infrastructure Information (CEII). Any stakeholder or Transmission Provider participating in the planning process must adhere to the Commission's guidelines concerning CEII as set out in the Commission's regulations, Order Nos. 683 and 683-A (or and successor thereto). Additional information concerning CEII, including a summary list of data that is determined by the supplying party to be deemed CEII, shall be posted on the Transmission Providers' OASIS.

2.2. **Coordination**

2.2.1 LTP Study Cycle: the Transmission Provider shall prepare an LTP during a four (4) quarter study cycle.

2.2.2 LTP Sequence of Events: the Transmission Provider shall use the following timeline in preparing its LTP.

2.2.2.1 Quarter 1: Data Collection, Study Scope and Scenario Development

2.2.2.1.1 The Transmission Provider will gather: (1) Network Customers' projected loads and resources, and load growth expectations (based on annual updates under Part III of the Tariff); (2) Transmission Provider's projected loads and resource needs for its Native Load Customers; (3) Point-to-Point Customer's projections for long-term (greater than 1 year) needs at each receipt and delivery point (based on information submitted by Eligible Customers to the Transmission Provider) including projections of rollover rights; and (4) information from all Transmission Customers and the Transmission Provider on behalf of Native Load Customers concerning existing and planned demand resources and their impact on demand and peak demand. The Transmission Provider shall take into consideration, to the

extent known or which may be obtained from its Transmission Customers, obligations that will either commence or terminate during the applicable study window. Customer Economic Study Requests will also be submitted to the Transmission Provider during this quarter. The Transmission Provider will, with stakeholder input, define the proposed LTP study scope, objectives, scenarios to be considered in development of the LTP. The Transmission Provider shall post the official timelines for data submittals on its OASIS.

2.2.2.1.2 The Transmission Provider will have a TCPC meeting during the first quarter to accept stakeholder comments to the Local Transmission Plan. The Transmission Provider will, with stakeholder input, finalize and post on the OASIS the basic methodology, planning criteria, assumptions and processes the Transmission Provider will use to prepare the LTP. As part of the TCPC meeting, the Transmission Provider will finalize study objectives, scenarios to be studied, discuss data collected, adequacy of the data, the need for any additional data and discuss applicable Economic Study Requests.

2.2.2.2 Quarter 2-3: Technical Study

2.2.2.2.1 The Transmission Provider will develop base cases that include load and resource data to represent the defined scenarios.

2.2.2.2.2 The Transmission Provider will conduct a combination of powerflow, transient stability studies, post transient power flow or other studies deemed necessary to properly analyze the transmission system.

2.2.2.2.3 The Transmission Provider will consider transmission and non-transmission solutions to mitigate system performance that does not meet reliability criteria. The Transmission Provider may consider the results from prior applicable Economic Studies.

2.2.2.2.4 The Transmission Provider may elect to post interim iterations of the draft plan or preliminary technical study results, and solicit comments prior to the end of the applicable quarter. The Transmission Provider will seek interested stakeholder input regarding advantages and disadvantages associated with proposed solutions in the transmission plan or technical study.

2.2.2.3 Quarter 4: Decision and Reporting

2.2.2.3.1 The Transmission Provider will solicit stakeholder input when determining selection criteria and weighting to be used in determining the best transmission or non-transmission solution identified in the draft LTP. Advantages and disadvantages to each solution will also be considered.

2.2.2.3.2 The Transmission Provider will prepare and publish a draft LTP report on its OASIS and solicit input from all stakeholders.

2.2.2.3.3 Using data and information from the Technical Study, and considering stakeholder input, the Transmission Provider will define its ten (10) year LTP.

2.2.2.3.4 The final LTP report will be posted on the Transmission Provider's OASIS and provided to applicable sub-regional and regional entities conducting similar planning efforts, interested stakeholders, and the owners and operators of the neighboring interconnected transmission systems.

- 2.2.2.3.5 The responsibility for the LTP shall remain with the Transmission Provider who may accept or reject in whole or in part, the comments of any stakeholder unless prohibited by applicable law or regulation.
- 2.2.3 Stakeholder Meetings: The Transmission Provider shall establish the TCPC to be used as the forum for stakeholder input throughout the study cycle described in Section 2.2.1. TCPC membership and meetings shall be open to all stakeholders, including but not limited to Eligible Customers, other transmission providers and federal and state commissions. The Transmission Provider shall utilize quarterly scheduled TCPC meetings to solicit, obtain, and coordinate the input of interested stakeholders throughout the Local Planning Process. Notice of TCPC meetings shall be posted on the Transmission Provider's OASIS with fifteen (15) business days prior notice. A list of participants or members will be maintained and will receive email notifications for upcoming meetings. The location of the meeting shall be selected by the Transmission Provider. The Transmission Provider shall provide for alternate means of participation, to the extent practical and economical, such as teleconference, web conference or other similar means. Instructions for participation in TCPC meetings shall be posted and maintained on the Transmission Provider's OASIS. The TCPC Charter is further described in Attachment K Business Practices posted on the Transmission Provider's OASIS website.
- 2.2.4 In addition to stakeholder input noted in Section 2.2.3 above, at each TCPC meeting, the Transmission Provider will: (1) discuss the status of the local transmission planning process, (2) summarize substantive study results if available, (3) present drafts of documents, and (4) receive stakeholder comments on the overall transmission plan.
- 2.2.5 The Transmission Provider shall post and maintain on its OASIS: (1) instructions, meeting notices points of contact, and other information

necessary to participate in the TCPC meeting, or other means established for the purpose of soliciting the input of or coordinating with interested stakeholders; (2) Written comments received from interested stakeholders, to the extent such comments are not confidential or subject to privilege; and (3) any draft LTP or any other documents the Transmission Provider deems necessary to promote coordination in the LTP study process. A complete list of OASIS posting requirements is defined in Section 2.4 of Attachment K.

2.3. **Information Exchange**

2.3.1 Types of Forecast Data: Transmission Customers shall submit annually information on projected load and resources (or sources of electrical supply) as required to facilitate the LTP planning process or to fulfill OATT, regulatory, legal or other Transmission Provider obligations. To facilitate the LTP, the Transmission Customer shall provide the Transmission Provider the following types of data during the first quarter of every year per the schedule posted on the Transmission Providers' OASIS:

2.3.1.1 Historical Data: monthly historical energy, peak load and minimum load data for the prior calendar year and the historical energy, peak load and minimum load data for all months of the current year as it becomes available.

2.3.1.2 Load Forecast Data: Network Transmission Customer shall provide their ten (10) year monthly energy, peak load and resource and minimum load and resource forecast data.

2.3.1.3 Point-to-point and other Transmission Customers: To maximize the effectiveness of the transmission planning process, it is essential that all other Transmission Customers provide their ten (10) year forecast of its projected use of rollover of existing reservations and any expected additional reservations. The forecast shall specify the Point of Receipt and Point of Delivery at the bust level.

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- 2.3.1.4 Generation Forecast Data: Transmission Customer shall provide data from their own generators including, but not limited to, technical engineering data for their generators and interconnection facilities, peak capability (MW) and expected maintenance schedule.
- 2.3.1.5 Demand Response Resource, Demand Reduction, Conservation and Demand-side Management: Transmission Customer shall provide demand response resource savings, conservation savings, and other customer load reduction alternatives that would reduce or alter the load of the Transmission Customer.
- 2.3.1.6 Interruptible and Other: Interruptible load tariff customers will be asked to supply a peak load forecast with and without the interruptible portion of the forecast data applied.
- 2.3.1.7 Other Supply Sources: Transmission Customer shall provide monthly energy and peak data for electrical supply sources not from Generators including, but not limited to, point of receipt and point of delivery.
- 2.3.2 Peak Load Forecast Temperature Adjustment: The Transmission Provider may request the temperature adjustment methodology to adjust the winter and summer peak load forecasts to an alternative (e.g., 1-in-2 ,1-in-10 and 1-in-20) probability assumption.
- 2.3.3 Additional Information: The Transmission Customer shall also provide, upon reasonable request, to the Transmission Provider the following information or other information as requested by the Transmission Provider:
- 2.3.3.1 Discussion of reasons for significant increase or decreases in load or generation forecast.
- 2.3.3.2 Source and vintage of load forecast and generation resource information.
- 2.3.3.3 Interruptible tariff loads and controllable demand response.
- 2.3.3.4 Weather station assumptions associated with load forecasts.

- 2.3.4 Eligible Customers shall submit Economic Study Requests no later than the date shown on the official timeline posted on the Transmission Provider's OASIS. Requests received after this time will be considered in the following annual study cycle.
- 2.3.5 Transmission Customer Obligation: Customers shall provide the Transmission Provider with generation, energy, peak and minimum load forecast, and demand response resources to the maximum extent practical and consistent with protection of proprietary information.
- 2.3.5.1 Customers shall also provide timely written notice (including email) of material changes to information previously provided relating to its load, resources, or other aspects of its facility or operations affecting the Transmission Provider's ability to provide service.
- 2.3.5.2 If any customer or stakeholder fails to provide data or otherwise participate as required by this Attachment K, the Transmission Provider cannot effectively include future needs in the Transmission Provider's Local Transmission Plan planning obligations. If any Network Customer fails to provide data or otherwise participate as required by this Attachment K, the Transmission Provider shall plan the system based on the most recent load and resource data received.
- 2.3.6 Comparability of Data: The same type of data request shall be sent by the Transmission Provider to all customers within the Transmission Provider's respective area of responsibility. The Transmission Provider shall include all valid data, along with appropriate comments on data received from Transmission Customers.
- 2.3.7 Confidentiality: Individual customer data will be treated as confidential and will be aggregated with other customer data for planning and reporting purposes. The data received will be used to develop the Transmission Provider's LTP and for reporting purposes.

- 2.3.8 Stakeholders and the Transmission Provider shall identify confidential documents or market sensitive information supplied during the transmission planning process. Any stakeholder or transmission provider seeking access to such confidential information must agree to adhere to the terms of a confidentiality agreement and have a “need to know”. The form of the Transmission Provider’s confidentiality agreement shall be developed initially by the Transmission Provider and posted on the OASIS. Thereafter, stakeholders shall have an opportunity to submit comments on the form of confidentiality agreement.
- 2.3.9 Market sensitive and commercial specific or other data, identified as such by the Transmission Customer will be considered confidential. Confidential information shall be disclosed in compliance with Standards of Conduct, and only to those participants in the planning process that require such information and that execute the confidentiality agreement; provided, however, any such information may be supplied to (i) federal, state or local regulatory authorities that request such information and protect such information subject to non-disclosure regulations, or (ii) upon order of a court of competent jurisdiction.
- 2.3.10 Schedule of Collection: The Transmission Provider will submit a request for forecast data annually, but no later than close of business Friday of the second full week of January, and merge it into the annual LTP study schedule as posted on OASIS. Similarly, the Transmission Provider shall post on the OASIS instructions, procedures and requirements for the submission of data.

2.4. **Transparency**

2.4.1 OASIS Requirements

- 2.4.1.1 The Transmission provider shall maintain a “Transmission Planning” folder on the publicly accessible portion of its OASIS to distribute information related to this Attachment K. Business

Practices and other information pertaining to the LTP will also be posted in the “Transmission Planning” folder.

2.4.1.2 The Transmission Provider shall maintain in the “Transmission Planning” folder on the publicly accessible portion of OASIS a subscription service or “How-To-Contact-Us” folder whereby any person may contact the Transmission Provider to receive e-mail notices, materials related to the LTP process or provide comments to the local transmission planning process.

2.4.1.3 Content of OASIS Postings. The Transmission Provider shall post in the “Transmission Planning” folder on its OASIS:

2.4.1.3.1 Transmission planning business practices along with the procedures for modifying the business practices;

2.4.1.3.2 Study cycle timeline and data submittal schedule;

2.4.1.3.3 Each Economic Study Request, and any response from the Transmission Provider;

2.4.1.3.4 A summary of information discussed at each TCPC meeting, or other similar meeting related to transmission planning;

2.4.1.3.5 In advance of its discussion at any TCPC meeting, all materials to be discussed;

2.4.1.3.6 Written comments submitted in relation to the Local Transmission Plan;

2.4.1.3.7 The draft, interim (if any), and final versions of the current Local Transmission Plan and non-confidential supporting documents;

2.4.1.3.8 The final version of all completed Local Transmission Plans for previous study periods;

2.4.1.3.9 Economic Study results.

- 2.4.1.3.10 Aggregated load forecasts representing the Transmission Provider's transmission system;
 - 2.4.1.3.11 Information regarding the status or material change of upgrades identified in the LTP.
 - 2.4.1.3.12 Material database changes noted in Section 2.4.2 below.
 - 2.4.1.3.13 Summary list of Critical Energy Infrastructure Information submitted during the planning process; and
 - 2.4.1.3.14 Key information concerning the NTTG, CCPG or WestConnect sub-regional planning process.
- 2.4.2 Database Access and Changes. A stakeholder may receive access from the Transmission Provider to the database and all changes to the database used to prepare the Local Transmission Plan according to the database access rules established by the WECC and upon certification to the Transmission Provider that the stakeholder is permitted to access such database. Unless expressly ordered to do so by a court of competent jurisdiction or regulatory agency, the Transmission Provider has no obligation to disclose database information to any stakeholder that does not qualify for access. Material changes or updates to the database used for the LTP, and reason for the changes will be posted on the Transmission Provider OASIS website.
- 2.5. **Cost Allocation**
- 2.5.1 Cost allocation principles expressed here do not supersede cost obligations as determined by other parts of the Tariff, which include but are not limited to transmission service requests, generation interconnection requests, Network Upgrades or Direct Assigned Facilities. Nothing contained in this Attachment K shall relieve or modify the obligations of the Transmission Provider or Transmission Customer Pursuant to the Tariff.
 - 2.5.2 Cost Allocation Principles
 - 2.5.2.1 For new local projects that do not fit into the Transmission Provider's OATT cost allocation principles, the Transmission

Provider will follow its “Local Cost Allocation Methodology” posted on the OASIS under the “Transmission Planning” folder unless a mutually agreeable cost allocation method can be reached between the Transmission Provider and the project participants or sponsors.

2.5.2.2 The costs of upgrades or other transmission investments subject to an existing transmission service request pursuant to the Tariff are evaluated in the context of that transmission service request.

2.5.2.3 To the extent possible, the Transmission Provider shall use mechanisms such as the TCPC or similar processes to work collaboratively with Transmission Customers and stakeholders regarding the allocation of costs for projects whose costs are not otherwise addressed under the OATT.

2.5.2.4 The Commission’s regulations, policy statements and precedent on transmission pricing shall be followed.

2.5.2.5 The cost allocation for sub-regional projects will be allocated consistent with the cost allocation principles of the applicable sub-regional entity, that is, WestConnect or NTTG. These Cost Allocation Principles can be found at www.westconnect.com and www.nttg.biz.

2.6. **Economic Planning Studies**

2.6.1 As part of the study cycle described in Section 2.2.2 above, the Transmission Provider will review Economic Study Requests. An Economic Study Request involves an assessment to determine whether transmission upgrades can reduce the overall cost of service to Native Load Customers and the load of other customers taking service under the Tariff. The Transmission Provider currently does not separately conduct economic planning studies and does not have the individual capability to conduct economic analyses, and thus, in the event of a request for an economic

- study, may contract with a qualified third party of its choosing to perform such work. The Transmission Provider will coordinate with the TCPC during the annual study cycle to identify and prioritize all Economic Study Requests and perform an assessment to determine if the Economic Study Request would reduce the overall cost of service to Native Load Customers and the load of other customers taking service under the Tariff.
- 2.6.2 An Eligible Customer may make an Economic Study Request by completing the Economic Study Request form located on the Transmission Providers OASIS within the “Transmission Planning” folder. Study requests are due to the Transmission Provider per the official timeline as posted on the Transmission Provider’s OASIS.
- 2.6.3 The Transmission Provider will coordinate with the TCPC to identify similar submitted Economic Study Requests which could be clustered into a single Economic Study.
- 2.6.4 The Transmission Provider or its Agent will study up to one (1) high priority Local Transmission Provider Economic Study annually.
- 2.6.5 Classification of Requests. The Transmission Provider, with input from the TCPC, shall classify a request for Economic Planning Studies as a Local Transmission Provider Economic Planning Request, Sub-Regional Economic Planning Request, or Regional Economic Planning Request.
- 2.6.5.1 A study request that is confined to the Transmission provider’s system and does not materially affect the interconnected transmission system, and remedies are confined to the local transmission system, will be considered a Local Transmission Provider Economic Planning Request and studied by the Transmission Provider or its Agent.
- 2.6.5.2 All other Economic Study Requests will be deemed sub-regional or regional requests and be forwarded to the appropriate sub-regional entity or a third party for study.

- 2.6.5.3 Any Economic Study Request deemed to be a sub-regional or regional request will be performed according to the appropriate sub-regional or regional study cycle.
- 2.6.6 Priority of Requests: The Transmission Provider shall identify up to one (1) high priority Local Transmission Provider Planning Request for study for the purpose of alleviating congestion through the integration of new supply and demand resource into the local transmission grid or expanding the local transmission to connect major new areas of generation resource.
- 2.6.6.1 Sponsors of Economic Planning studies not prioritized as a high priority study may re-submit the Economic Study Request for study consideration in the next economic planning cycle or may fund the study as an Additional Economic Study.
- 2.6.7 Economic Study Process: The Local Transmission Provider or its Agent shall study valid requests for Economic Planning Studies in a manner that is open, transparent and coordinated with stakeholders utilizing the TCPC or other method established by the Transmission Provider. The economic study timeline and process is further defined in Attachment K Business Practices located on the Transmission Providers OASIS.
- 2.6.8 Economic Study Contents: Local Transmission Provider Economic Studies shall include, but not be limited to: the location and magnitude of congestion, possible congestion remedies and the cost of relieving congestion.
- 2.6.9 Customer Obligation to Share Data: Transmission Customers requesting an economic Study shall, upon request of the Transmission Provider, supply all relevant information necessary to perform the economic study. If the Transmission Customer fails to provide the information requested, the Transmission Provider shall have no obligation to complete the study.
- 2.6.10 Additional Economic Studies: Economic study requests that are not prioritized as the highest priority local study shall be referred to as

Additional Studies. The Transmission Customer or sponsor shall pay for actual costs to perform Additional Studies. The process, procedure, and methodology for processing Additional Economic Studies is further defined in Attachment K Business Practices located on the Transmission Providers OASIS.

2.6.11 Recovery of Planning Costs: The costs to complete the high priority economic studies shall be recovered through the Transmission Provider's transmission rate base. The cost for Additional Economic Studies shall be borne by the sponsor of the Economic Study Request.

2.7. **Dispute Resolution**

2.7.1 Process: If a dispute arises from the Transmission Providers Local System Planning process, the Dispute Resolution process set forth below will be followed.

2.7.2 The use of this Dispute Resolution process will be limited to specific issues arising from the Transmission Providers local transmission system planning.

2.7.3 Before Eligible Customers, stakeholders or other transmission providers initiate a hotline or formal complaint with the FERC, the Parties shall complete the process set forth below:

2.7.3.1 Step 1: The dispute resolution process shall be initiated by submittal of a dispute letter outlining the complaint to the Transmission Provider. Upon receipt of a dispute letter, the Transmission Provider shall set a meeting between the senior representatives for each of the disputing parties, at a time and place convenient to such parties, within 30 calendar days after receipt of the dispute letter. The senior representatives shall engage in direct dialogue, exchange information as necessary, and negotiate in good faith to resolve the dispute. Any other stakeholder that believes it has an interest in the dispute may participate. The senior representatives will continue to negotiate until such time as (i) the dispute letter is withdrawn; (ii)

the parties agree to a mutually acceptable resolution of the disputed matter, or (iii) after 60 calendar days, the parties remain at an impasse.

2.7.3.2 Step 2: If Step 1 is unsuccessful at reaching a consensus agreement to resolve the dispute, the next step shall be mediation, as defined in Appendix C of the Western Electricity Coordinating Council (WECC) bylaws.

2.7.3.3 Step 3: If Step 2 is unsuccessful at reaching mutual agreement among parties to the dispute, the next step shall be binding arbitration, as defined in Appendix C of the Western Electricity Coordinating Council (WECC) bylaws.

2.7.3.4 Step 4: All negotiations and proceedings pursuant to this process are confidential and shall be treated as compromise and settlement negotiations for purposes of applicable rules of evidence and any additional confidentiality protections provided by applicable law.

2.7.3.5 The basis of the dispute and final non-confidential decisions will be made available to stakeholders upon request.

2.7.3.6 Disputes over any matter shall be communicated in a timely manner; provided, however, in no case shall a dispute be raised more than 30 calendar days after a decision is made in the study process or the posting of a milestone document, whichever is earlier.

2.8. **Transmission Business Practices**

2.8.1 The Transmission Provider has posted on its OATT website (<http://www.oatioasis.com/bhbe/>): (1) the “Attachment K Business Practice” which provides additional information regarding the implementation of this Attachment K; and (2) the “Transmission Provider Methodology Criteria and Process Business Practice” which provides additional information related to Principle 4, Transparency.

3. Sub-regional Planning Process

The Transmission Provider's transmission system is located in primarily in Northeast Wyoming and Western South Dakota with interconnections with neighboring transmission systems in both Wyoming and Nebraska. The neighboring transmission systems are owned and operated by entities which are members of either the Northern Tier Transmission Group (NTTG) or the Colorado Coordinated Planning Group (CCPG) and WestConnect. Specifically, the Transmission Provider transmission system interconnects with the PacifiCorp transmission at or near the Wyodak, Carr Draw and Antelope Mine Tap substations. PacifiCorp is a member of NTTG. Additionally, the Transmission Provider transmission system interconnects with Western Area Power Administration at the Stegall substation. Western Area Power Administration is a member of both CCPG and WestConnect. Due to the importance of coordinating transmission planning activities with neighboring transmission systems in a sub-regional context, the Transmission Provider will participate in the NTTG, CCPG and WestConnect sub-regional planning groups.

3.1. Northern Tier Transmission Group

3.1.1 The Transmission Provider is a member of the NTTG Planning Committee:

3.1.1.1 The Transmission Provider will use the NTTG process for sub-regional planning, coordination with adjacent sub-regional groups and other planning entities, and proposals to WECC TEPPC for regional planning. Participants in the NTTG Planning Committee have committed to working with one another and with affected stakeholders and state officials, to increase the efficient use of the grid and to develop the infrastructure needed to deliver new renewable and thermal power resources to consumers. The Transmission Provider has committed to support the sub-regional planning process through participation in the NTTG Planning Committee and providing employee support of the NTTG planning efforts. Stakeholders may participate in NTTG's activities and

programs at their discretion. Eligible Customers and stakeholders may participate directly in the NTTG processes or participate indirectly through the Transmission Provider via development of the LTP. Additional information, including a map containing the current geographic footprint of NTTG can be found on the NTTG website at <http://www/nttg/biz>.

3.1.2 **The Transmission Provider Coordination with NTTG:**

3.1.2.1 The Transmission Provider will collect customer data and consolidate load service and other transmission service requests through the local planning process described in Section 2 above. The Transmission Provider will provide NTTG with its LTP incorporating all of the transmission service forecasts for its transmission system. NTTG will conduct its planning process to identify needs; least cost expansion project alternatives, technical benefits and projected costs. NTTG will select beneficial expansion sub-regional projects and address cost allocation among participating Transmission Providers. Specifics of the NTTG planning process are available on NTTG's website at www.nttg.biz.

3.1.3 **Study Process:**

3.1.3.1 The Transmission Provider will support the NTTG processes and will participate in the NTTG Planning Committee to establish a coordinated sub-regional study process, involving both economic and reliability components, as outlined in the NTTG Planning Committee charter, which is approved by the NTTG Steering Committee. The current NTTG Planning Committee charter, planning cycle and meeting notices are available on NTTG's website at www.nttg.biz. Results of sub-regional and regional planning efforts will be considered in future transmission system planning cycles.

3.1.4 **Stakeholder Participation:**

3.1.4.1 Eligible Customers and stakeholders may participate in the NTTG sub-regional planning process pursuant to the requirements of NTTG. The NTTG Planning Committee is open to membership by the Transmission Providers, any providers of transmission services, any Eligible Customer, and any state utility commission. NTTG has developed rules governing access to, and disclosure of, sub-regional planning data by members. Members of NTTG are required to execute standard non-disclosure agreements before sub-regional transmission planning data are released.

3.1.4.2 Eligible Customers and stakeholders may comment on NTTG study criteria, assumptions, or results at their discretion either through direct participation in NTTG or by submitting comments to the Transmission Provider to be evaluated and consolidated with the Transmission Provider's comments on the sub-regional plan, criteria, and assumptions.

3.1.5 **Economic Congestion Studies:**

3.1.5.1 The Transmission Provider will participate in the NTTG processes to prioritize and complete up to two (2) sub-regional economic congestion studies per NTTG planning cycle, as outlined in NTTG's standardized process for congestion studies. The sub-regional economic congestion studies will address those requests submitted by Eligible Customers and stakeholders to member Transmission Providers that require analysis across multiple NTTG member transmission systems. NTTG may submit requests for regional economic congestion studies to the WECC TEPPC pursuant to NTTG developed processes.

3.1.5.2 Within each planning cycle, any Eligible Customer or stakeholder may request additional Economic Congestion Studies, or Economic

Congestion studies that were not prioritized for completion by NTTG, to be paid for at the sole expense of the requesting party. Such requests shall be made by the Eligible Customer or stakeholder to the Transmission Provider. The Transmission Provider will tender a study agreement that addresses, at a minimum, cost recovery for the Transmission Provider and schedule for completion.

3.1.6 **Dispute Resolution:**

3.1.6.1 The Transmission Provider will participate in the NTTG dispute resolution process to resolve disputes related to the integration of the Transmission Provider's local plan with the sub-regional Expansion Plan and associated cost allocation. The NTTG dispute resolution process may be initiated to enforce compliance with the NTTG study process, or to challenge a decision within a milestone document. Eligible Customers and stakeholders participating in the NTTG planning committee may also utilize the NTTG planning agreement dispute resolution process. Disputes over any matter shall be raised timely; provided, however, in no case shall a dispute be raised more than 30 days after a decision is made by the planning committee in study process or the posting of a milestone document, whichever is earlier.

3.1.7 **Cost Allocation:**

3.1.7.1 The Transmission Provider will support the NTTG to prepare and submit recommendations for cost allocation associated with the NTTG sub-regional plan to the NTTG Cost Allocation Committee and process, and ultimately the NTTG Steering Committee for approval. This Steering Committee approval will represent a non-binding sub-regional consensus of cost allocation formed with direct state commission involvement and support.

3.2. **Colorado Coordinated Planning Group**

3.2.1 **The Transmission Provider is an active participant of CCPG:**

3.2.1.1 CCPG is a joint, high voltage transmission planning forum for the purpose of assuring a high degree of reliability in the planning, development, and operation of the high voltage transmission system in the Rocky Mountain Region. The Transmission Provider attends and actively participates in CCPG meetings and activities. The CCPG footprint encompasses Colorado, Wyoming and Western South Dakota. Information on CCPG activities can be found on the CCPG website at <http://ccpg.basinelectric.com>. A link to the CCPG website can be found on the Transmission Provider OASIS under the Transmission Planning folder.

3.2.2 **The Transmission Provider Coordination with CCPG:**

3.2.2.1 The Transmission Provider will submit its transmission plans to CCPG as required for inclusion in CCPG's planning activities. Additionally, the Transmission Provider will support CCPG planning activities through development of study assumptions, supplying of system data, execution of studies when available, and review of study results and reports. The Transmission Provider actively participates in the CCPG transmission planning activities to ensure that the Transmission Provider data and assumptions are coordinated with the CCPG transmission plans and studies.

3.2.3 **Study Process:**

3.2.3.1 WestConnect will work with the CCPG and Southwest Area Transmission Planning Group ("SWAT") planning processes to develop the WestConnect Transmission Plan. The WestConnect Transmission Plan will be presented to the WestConnect Steering Committee for review and approval.

3.2.4 **Stakeholder Participation:**

3.2.4.1 All stakeholders may participate in the CCPG sub-regional planning process through attendance of CCPG meetings or input to the Transmission Providers. CCPG meetings are held three times per year and are open to any providers of transmission services, any Eligible Customer, any state utility commission and any interested party.

3.2.5 **Cost Allocation:**

3.2.5.1 WestConnect encourages, to the maximum extent possible, the use of open season solicitation, multi-party transmission ownership, and potential co-existence of both physical and financial transmission rights for transmission projects planned under the WestConnect processes.

3.3. **WestConnect Sub-regional Transmission Planning**

3.3.1 **The Transmission Provider will support WestConnect Planning Activities**

3.3.1.1 The WestConnect Regional Planning Work Group's (RPWG) goal is to promote effective transmission planning within the sub-region comprised of the WestConnect footprint. This is accomplished through coordination with CCPG, Southwest Area Transmission Planning Group (SWAT) and Sierra sub-regional planning groups. WestConnect's objective is to integrate the WestConnect participants transmission plans into a single ten-year regional transmission plan covering the WestConnect footprint. Information on the WestConnect planning process can be found on the WestConnect website at www.westconnect.com.

3.3.2 **The Transmission Provider Coordination with WestConnect**

3.3.2.1 The Transmission Provider will coordinate and actively participate in the WestConnect planning process by:

3.3.2.1.1 Coordinating, developing and updating common base cases to be used for all study efforts within the SWAT, CCPG and Sierra planning groups and ensuring that each plan adheres to the common methodology and format developed jointly by WestConnect sub-regional planning groups for this planning purpose.

3.3.2.1.2 Actively participating in the sub-regional planning processes including submitting its transmission plan to CCPG for review and comment and use within WestConnect's planning process.

3.3.2.1.3 Adhering to and supporting the jointly developed WestConnect-SWAT-CCPG Principals for Sub-Regional Transmission Planning.

3.3.3 **Stakeholder Participation:**

3.3.3.1 All stakeholders may participate in the WestConnect planning process through participation in the two public stakeholder meetings held each year or by providing input to the Transmission Provider for presentation to WestConnect.

3.3.4 **Cost Allocation:**

3.3.4.1 WestConnect encourages, to the maximum extent possible, the use of open season solicitation, multi-party transmission ownership, and potential co-existence of both physical and financial transmission rights for transmission projects planned under the WestConnect processes.

4. **Regional Planning Process**

4.1. **The Transmission Provider is a member of WECC:**

4.1.1 The Transmission Provider supports the work of WECC TEPPC. NTTG and WestConnect may utilize WECC TEPPC for consolidation and completion of congestion and economic studies, base cases, and other

regional planning. NTTG and WestConnect may coordinate with other neighboring sub-regional planning groups directly, through joint study teams, or through the regional process. Eligible Customers and stakeholders may participate directly in the WECC processes, pursuant to participation requirements defined by WECC TEPPC, or participate indirectly through the Transmission Provider via development of the Transmission System Plan or through sub-regional processes as outlined above in Section 3.

4.2. **The Transmission Provider Coordination with WECC TEPPC:**

4.2.1 The Transmission Provider will coordinate with WECC TEPPC for regional planning through its participation in NTTG and WestConnect. The Transmission Provider will also use NTTG and WestConnect to coordinate with neighboring sub-regional planning groups including the CAISO, NWPP and Columbia Grid. The goal of sub-regional coordination on a regional basis on behalf of the Transmission Provider is to (1) share system plans to ensure that they are simultaneously feasible and otherwise use consistent assumptions and data, and (2) identify system enhancements that could relieve congestion or integrate new resources.

4.3. **Study Process:**

4.3.1 The WECC TEPPC Transmission Planning Protocol will be available by document or link on the Transmission Providers' OASIS.

4.4. **Stakeholder Participation:**

4.4.1 Stakeholders have access to the regional planning process through NTTG's and WestConnect's public planning meetings, other sub-regional planning groups, and WECC at their discretion.

4.5. **Economic Congestion Studies:**

4.5.1 The Transmission Provider will support, directly and through its participation in NTTG and WestConnect, the WECC TEPPC processes to prioritize and complete regional economic congestion studies requested by

customers and stakeholders to each member transmission provider in each calendar year within the Western Electricity Coordinating Council's footprint as outlined in the standardized mechanism.

4.6. **Dispute Resolution:**

4.6.1 Regional dispute resolution will be pursuant to the process developed by WECC.

4.7. **Cost Allocation:**

4.7.1 A Western Interconnection regional cost allocation methodology does not exist; therefore cost allocations for regional transmission projects will be addressed on a case-by-case basis by parties participating in the project.

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