

## ATTACHMENT K

### TRANSMISSION PLANNING PROCESS

#### 1.0 Introduction

This Attachment K addresses the rights and obligations of Transmission Customers, relevant stakeholders and the Transmission Provider related to Transmission Planning. Specifically, Attachment K addresses: (a) the Mid-Continent Area Power Pool (“MAPP”) regional planning process adopted by Regional Transmission Committee (“RTC”) Members of MAPP in the RTC region, as those terms are defined by the MAPP Restated Agreement; and (b) the Transmission Provider’s local planning process for local facilities not covered by the MAPP regional planning process. Attachment K discusses both planning processes.

The MAPP Regional Plan integrates the transmission plans developed by individual MAPP Members through the RTC’s Transmission Planning Subcommittee (“TPSC”) and by subregional planning groups (“SPGs”), in order to meet the transmission needs in the MAPP Region of Members and non-Members on a consistent, reliable, environmentally acceptable and economic basis. The MAPP Regional Plan shall be consistent with applicable standards and requirements established by the MAPP Members Reliability Criteria and Study Procedures Manual and by the North American Electric Reliability Council (NERC) and Midwest Reliability Organization (MRO) Planning Standards.

#### 2.0 Definitions

- 2.1 **Host Transmission Owner (“Host TO”).** The transmission owner on whose transmission system a proposed Economic Network Upgrade is to be located. If facility upgrades are required on more than one transmission owner’s transmission system for a given set of transmission facilities comprising an Economic Network Upgrade, the affected Host TOs shall provide a single joint Facilities Agreement to the Subscription Rights buyers.
- 2.2 **Affected System.** The transmission owner’s system, including the Host TO, that is affected by the allocations in an economic benefits study performed by the MAPP RTC in compliance with Section 11 of this Attachment K.
- 2.3 **Affected System Operator.** The transmission owner/operator that operates an Affected System.
- 2.4 **Economic Network Upgrade.** A project, or set of projects, that is designed to relieve a constrained facility by providing additional transmission capacity, and which has been identified to be: (1) a local economically beneficial project within a single transmission owner’s system; or (2) an economically beneficial project classified as a Regionally Beneficial Project in the MAPP Plan, and (3) defined by an

Economic Planning Study authorized by the MAPP RTC in Section 11 of this Attachment K as having project benefits exceeding project costs.

- 2.5 Subscription Rights.** Contractual rights to use the transmission capacity associated with an Economic Network Upgrade defined in a Facilities Agreement with the Host TO in exchange for payments to the Host TO for facility charges and continuing operation and maintenance charges.
- 2.6 Other Defined Terms.** All other terms will have the meanings set forth in the Restated Agreement, the TPSC procedures, and the SPG guidelines.

### **3.0 MAPP Regional Transmission Planning**

**3.1 Member Plans** — As part of the MAPP regional transmission planning process, each RTC Member that has facilities under MAPP’s regional point-to-point open access transmission tariff, Schedule F, shall prepare and maintain a plan for its transmission facilities (“Member Plan”). Such Member Plans shall conform to applicable reliability standards and requirements, and to applicable methods and assessment practices and other transmission planning standards and requirements established by the RTC. Each Member Plan shall adhere to Local Transmission Planning Standards set forth in Section 13 of this Attachment K. Such plans shall take into account:

- (a) the RTC Member’s current and anticipated requirements for transmission to provide all-requirements and partial requirements service and service to its end-use loads;
- (b) the current and anticipated requirements for transmission to provide network transmission service to those entities for which the RTC Member provides such service;
- (c) the RTC Member’s other contractual and tariff obligations to provide firm transmission service;
- (d) any other contractual obligations of the RTC Member affecting the use of its transmission facilities;
- (e) any requirements for future transmission service of a Member or non-Member communicated to the RTC Member under procedures, standards and requirements established by the RTC;
- (f) facilities for which a commitment has been made as of the effective date of the Restated Agreement;
- (g) the coordination of the RTC Member’s transmission plan with the transmission plans of neighboring systems, and in particular any coordination parameters or requirements identified by the relevant subregional working groups used by the RTC; and
- (h) the obligation of the RTC Member under FERC requirements, the Restated Agreement, and applicable standards and requirements

established by the RTC to provide transmission service to other entities on a basis comparable to its own use of its transmission facilities.

**3.2 Availability of Plans and Information** — The RTC Members' transmission plans, along with the information on which the plans are based, shall be made available to the RTC on a regular basis as established by the RTC. Each RTC Member shall make its transmission plan available upon request to any other RTC Member, independent Regional Transmission Organization or relevant non-MAPP neighboring transmission owning utilities. Sufficient additional information should be made available to enable the requesting entity to perform planning analyses on the same basis as the RTC Member providing the information. Such information shall be provided subject to CEII and FERC standards of conduct restrictions.

**3.3 Planning Procedures and Requirements** — The RTC shall establish procedures and requirements for:

- (a) The communication to an RTC Member by Members and non-Members of their *bona fide* requirements for transmission service;
- (b) The utilization of SPGs for the coordination of RTC Members' transmission plans and the resolution of subregional transmission planning issues on an informal, collaborative basis, which working groups shall be open to any interested RTC Member and any actual or potential user of the relevant transmission facilities, and shall maintain such records as shall be required by the RTC;
- (c) The incorporation of asserted *bona fide* requirements for transmission service into RTC Member, subregional, and regional transmission plans; and
- (d) The development of integrated transmission plans by the subregional working groups, and the integration of the subregional plans into a transmission plan for the MAPP RTC Region.

**3.4 The MAPP Regional Plan** — Not less often than biennially the RTC shall develop and approve a coordinated transmission plan, including alternatives, for the ensuing 10 years, or other planning period specified by NERC, for all transmission facilities in the MAPP RTC Region at a capacity of 115 kV or greater. The MAPP Regional Plan shall integrate the transmission plans developed by individual RTC Members and by subregional working groups, for the purpose of enabling the transmission needs in the MAPP RTC Region of Member and non-Members to be met on a consistent, reliable, environmentally acceptable and economic basis.

The MAPP Regional Plan shall avoid unnecessary duplication of facilities or the imposition of unreasonable costs on any RTC Member, shall take into account the legal and contractual rights and obligations of all Members, may provide alternative means for meeting transmission needs in the MAPP RTC Region, and

shall differentiate proposed transmission projects from projects for which a definite commitment of resources has been made.

The MAPP Regional Plan shall be consistent with standards and requirements established by the applicable reliability entity. The RTC shall develop policies and procedures for updating or modifying the Plan between biennial planning cycles as may be appropriate. Any Member, Regulatory Participant, or interested non-Member may attend any meeting of the RTC or any of its subcommittees dealing with the MAPP Regional Plan. At the request of any RTC Member or Regulatory Participant any non-RTC Member may participate in, but not vote at, any such meeting.

#### **4.0 MAPP Regional Planning Process.**

**4.1 MAPP Regional Plan Development Process.** The TPSC, the RTC Subcommittee responsible for planning in the MAPP region, shall collect the individual Member Plans of the MAPP Members and integrate these Member Plans into four coordinated Subregional Plans. All MAPP Members are obligated to submit their transmission Member Plans to the TPSC under the MAPP Restated Agreement. These Members Plans are to include the needs of all stakeholders in the Member's service area. The Subregional Plans primarily address local load serving needs and subregional issues, but are not precluded from providing for regional transmission needs.

The TPSC collects these Subregional Plans and integrates them into a single coordinated preliminary MAPP Regional Plan. The TPSC, through its working group TRAWG, assesses the adequacy and security of the preliminary MAPP Regional Plan to meet the local, subregional, regional and inter-regional reliability and market needs, and where required, identifies and evaluates alternates and recommends preferred plans to address deficiencies. The final MAPP Regional Plan is submitted to the RTC for approval. The appropriate Transmission Owning Members of MAPP, as that term is defined in the Restated Agreement, are responsible for designing, constructing and placing into service the various transmission projects comprising the MAPP Regional Plan. The MAPP Design Review Subcommittee is responsible for reviewing and approving these individual projects prior to energization and operation.

The TPSC initiates several activities as part of a planning process to produce the MAPP Regional Plan. These activities included collection of planning input data, preparation of study models, the formation of sub-regional planning groups to collect and coordinate individual Member Plans, collaboration with regulatory agencies, and a procedure to study and evaluate the effectiveness of proposed enhancements in addressing regional and inter-regional problems.

**4.2 Process Steps for MAPP Regional Plan Development.** The TPSC shall prepare the MAPP Regional Plan as set forth in the MAPP Restated Agreement and this

Attachment K and as detailed in the TPSC procedures. The TPSC uses milestone dates as established in the MAPP Regional Transmission Planning Procedures Manual for the following items:

**4.2.1 TPSC Data Collection from Members (Annually):**

- (a) SPG Member and Working Group studies ongoing
- (b) Subregional Plan Addendum report submitted to TPSC

**4.2.2 Data Analysis by TPSC (during the MAPP Regional Plan year):**

- (a) History of constrained interface performance
- (b) History of transmission loading relief requests
- (c) Review of reliability assessment studies and reports

**4.2.3 TPSC Model Preparation:**

- (a) Selection of base case models from appropriate MRO Model Series
- (b) Addition of Member and SPG plans to models
- (c) Validation of firm transactions, major new loads, and new generation

**4.2.4 Study Procedures: The TPSC shall:**

- (a) Evaluate base system with Member/SPG planned additions (local plans)
- (b) Identify and evaluate alternative plans to meet regional and inter-regional reliability and market requirements (assess impacts on local plans)
- (c) Cost Analysis

**4.2.5 Regulatory Collaboration**

- (a) Regulatory participation at SPG and TPSC meetings
- (b) Regulatory input at preliminary planning stages
- (c) Process to address “why project needed” and “why it is better than other alternatives considered” through SPG Meeting process

**4.2.6 MAPP Regional Plan Report and Approval**

- (a) Submit MAPP Regional Plan Report to the RTC for approval of the MAPP Regional Plan year

**4.3 Updating the MAPP Regional Plan. The TPSC shall update or modify the MAPP Regional Plan between biennial planning cycles in accordance with the procedures below. This update to the MAPP Regional Plan, shall be issued to the RTC for approval. The established SPGs shall remain active in the planning**

process for their respective subregions. Individual utility Member Plans and detailed documentation should be submitted to the SPGs for their approval.

In order to accomplish this update process, the SPGs shall:

- (a) review the individual utility Member Plans;
- (b) coordinate the individual utility Member Plans within their subregion;
- (c) evaluate the impacts of the individual Member Plans on their subregion and possibly require additional evaluation or study work; and
- (d) submit Sub-Regional Plan modifications to the TPSC each off-year.

The TPSC shall:

- (a) evaluate the subregional plan modifications for their impact on the MAPP Regional Plan;
- (b) provide feedback to the SPGs regarding the regional impacts; and
- (c) approve or deny all final modifications to the MAPP Regional Plan each off-year.

Modifications to the MAPP Regional Plan may include: (a) commitments to new generation; (b) new transmission facilities; (c) changes in construction schedules; or (d) changes in project scope. All approved MAPP Regional Plan modifications must be included in the MRO Model building process and should be submitted to the MRO Model Building Subcommittee by the responsible transmission owning entity.

**4.4 Identification of Transmission Requirements.** The following process is used to communicate to the TPSC the transmission requirements identified by the Member and Non-Member entities:

- (a) Non-Members (Stakeholders) may contact the Member transmission provider in the area where service is required. If it is unclear as to who is the appropriate transmission provider, the non-Member should contact any member of the TPSC.
- (b) The Member is required to take both the Member Plans and Non-Member plans to the appropriate SPGs. The SPG Guidelines indicate the required format Members are to use to submit the data.
- (c) The SPGs must prepare coordinated subregional plans incorporating the member and non-member needs.
- (d) The SPG approved (consensus) plans are forwarded to the TPSC.

- (e) The TPSC develops a coordinated MAPP Regional Plan addressing SPG, regional and inter-regional needs.
- (f) The TPSC forwards the MAPP Regional Plan to the RTC for approval.

The TPSC will establish liaisons with existing neighboring regional planning entities to facilitate addressing inter-regional transmission issues.

## **5.0 The Transmission Planning Subcommittee (TPSC)**

### **5.1 Procedures for Conduct of TPSC Meetings**

**5.1.1 TPSC Role.** The MAPP TPSC, under the direction of the RTC, shall develop the MAPP Regional Plan and make all related decisions related to regional planning, subject to approval by the RTC. The TPSC shall utilize the following procedures in developing the MAPP Regional Plan and making such related decisions.

**5.1.2 TPSC Representatives.** The TPSC shall have equal numbers of Representatives of the Transmission Owning Members and Transmission Using Members, as those terms are defined by the Restated Agreement. Such Representatives shall be elected by the RTC as currently set forth in the MAPP Restated Agreement. The RTC sets the size, duties and responsibilities of the TPSC.

**5.1.3 TPSC Meeting Notification.** The notice of a TPSC meeting shall state the time and place of the meeting and shall include an agenda sufficient to notify an interested party of the substance of the matters considered at the meeting. The TPSC meeting notice and agenda shall be sent at least 10 days prior to the meeting. All meeting notices are communicated electronically through e-mail distribution lists, and subsequently posted at [www.mapp.org](http://www.mapp.org). All meeting notices shall be publicly available.

**5.1.4 TPSC Meeting Agenda Development.** The TPSC agenda shall include the time and place of its meetings. An interested party shall submit a request to the Chair and the Secretary of the TPSC to have an item considered at the next TPSC meeting at least 15 days in advance, subject to any limitations set forth in the TPSC procedures manual. The Chair of the TPSC has authority to determine action items for the meeting agenda. All action items shall be shown and communicated clearly so that any interested party can determine what is being acted upon.

The TPSC meeting agenda shall be posted at [www.mapp.org](http://www.mapp.org) and sent via the TPSC distribution list at least 10 days prior to the meeting. The TPSC will make the best effort attempt to communicate all supporting information for the meeting agenda at least 10 days prior to the meeting. The supporting information shall be posted on the [www.mapp.org](http://www.mapp.org) after

communicating it via the e-mail distribution list, unless the information has been deemed to fall under the Federal Energy Regulatory Commission's determination as Critical Energy Infrastructure Information (CEII).

- 5.1.5 TPSC Action.** The publication of an agenda of actions to be voted upon by the TPSC shall include the wording of any proposed motion, and a brief discussion, as needed, of the reasons for the motion to be offered and voted. The member of the TPSC or other entity sponsoring the motion shall provide the wording of the motion and the discussion points. A best effort attempt shall be made by those sponsoring items on a TPSC meeting agenda to have background material, and the action to be voted, distributed with the meeting agenda in a timely manner. In general, an action may not be brought to a vote of the TPSC unless it is noticed on a published agenda at least ten (10) days prior to the meeting date upon which action is to be voted. This requirement for a 10-day notice may be waived either by the approval of the TPSC Chair or by 90% affirmative vote of the TPSC's voting members present at a TPSC meeting at which a quorum has been established, subject to any limitations set forth in the TPSC procedures.
- 5.1.6 TPSC Meeting Procedures.** The TPSC shall utilize Robert's Rules of Order for guidance regarding conduct of subcommittee meetings. A quorum is necessary to conduct TPSC business. A quorum is established when 50 percent or more of TPSC Representatives are present as currently stated in the MAPP Restated Agreement. A vacant position on the TPSC does not count towards the quorum requirement. All interested parties can attend TPSC and working group meetings.
- 5.1.7 Affirmative Votes.** Actions or decisions by a subcommittee requires an affirmative vote of two-thirds of both the TPSC Transmission Owning Members and the Transmission Using Members as set forth in the MAPP Restated Agreement.
- 5.1.8 TPSC Meeting Minutes.** All TPSC meetings shall be recorded through accurate and timely meeting minutes. Draft TPSC meeting minutes shall be distributed to TPSC Representatives 10 business days following the meeting date for review and comment. The TPSC will attempt to approve their previous meeting's minutes at their next meeting. Once the meeting minutes are approved by the TPSC, the minutes are sent to the TPSC and RTC e-mail distribution lists and posted at [www.mapp.org](http://www.mapp.org).
- 5.1.9 Review of TPSC Action.** An RTC Member or Regulatory Participant may request a review of TPSC actions, in accordance with the MAPP Restated Agreement.

**5.2 TPSC Responsibilities.** The Transmission Planning Subcommittee shall:

- (a) develop and recommend for approval by the Regional Transmission Committee the biennial MAPP Regional Plan required by the Restated Agreement;
- (b) develop procedures and policies for updating and modifying the MAPP Regional Plan between biennial planning cycles, and approve modifications to the MAPP Regional Plan;
- (c) develop and approve procedures, standards and requirements for the communication of the future transmission requirements of Members and non-Members to the appropriate Transmission Owning Members, and for the inclusion of *bona fide* requirements in the transmission Member Plans of the Transmission Owning Members, and in the MAPP Regional Plan;
- (d) establish procedures, standards and requirements for the coordination of the transmission Member Plans of the Transmission Owning Members with the plans of neighboring transmission systems, including establishing of subregional planning groups for resolution of subregional planning issues on a cooperative basis;
- (e) establish procedures, standards, and requirements for making available Member Plans and the information on which the Member Plans are based, as required by the Restated Agreement;
- (f) establish procedures, standards and requirements for public input, including input from Regulatory Participants, in the development of the MAPP Regional Plan;
- (g) determine the appropriate Member or Members to construct and own, or to receive Rights Equivalent to Ownership in, transmission facilities;
- (h) coordinate with the subcommittees of the Regional Transmission Committee, the Midwest Reliability Organization (MRO) and Adjacent system pertinent to reliability issues, standards, requirements, procedures, models and studies, and conduct or request the MRO to conduct such studies as appropriate to carry out the responsibilities of the TPSC;
- (i) conduct appropriate transmission economic planning studies;
- (j) conduct appropriate transmission cost allocation analysis for new projects;
- (k) assume responsibility for submission of FERC Form 715 information for MAPP;
- (l) conduct transmission adequacy and security assessments as appropriate, including assessments of the intra- and inter-regional transfer capability of the MAPP system; and
- (m) oversee the duties and responsibilities of Working Groups.

**6.0 Sub-regional Planning Groups**

- 6.1 Current SPGs.** The TPSC has established and recognized the following SPGs to carry out the task of coordinating transmission plans among Members:
- (a) Northern MAPP
  - (b) Missouri Basin
  - (c) Iowa Transmission Working Group
  - (d) Nebraska
- 6.2 Establishment of SPGs.** The TPSC can establish new or recognize additional SPGs to carry out the task of coordinating transmission plans among Members. The TPSC may also recognize and coordinate its MAPP Regional Plan with existing or future transmission planning study groups concerned with transmission facilities located outside the MAPP region.
- 6.3 SPG Membership.** Membership in a SPG is open to any interested Member and any actual or potential user of the relevant transmission facilities. Neighboring transmission owning utilities and regulatory participants are eligible and encouraged to join the SPG to promote joint planning between MAPP and its neighboring regions.
- 6.4 SPG Guidelines.** The Subregional Planning Groups, to the extent possible, should:
- (a) develop a coordinated Subregional Plan, the SPG Biennial Plan, including alternatives, for the ensuing ten years, for all transmission facilities in the subregion at a voltage of 100 kV or greater;
  - (b) review and comment on proposed Member Plans for additions and modifications to the subregional transmission system;
  - (c) provide documentation to the MAPP Design Review Subcommittee on the results of the SPG review of Member Plans;
  - (d) incorporate proposed Member load-serving plans to the subregional transmission system into the SPG Biennial Plan;
  - (e) incorporate Member Plans for new generator connections into the SPG Biennial Plan, ensuring the outlet transmission is capable of delivering full-accredited output to load over the system load range of 70 percent to 100 percent of peak load;
  - (f) coordinate the Subregional Plans of the SPG with the Subregional Plans of neighboring SPGs;
  - (g) update the SPG Biennial Plan as deemed necessary by the SPG or the TPSC;

- (h) form technical study task forces as required to carry out the subregional planning responsibilities;
- (i) encourage non-MAPP member participation to ensure that the TPSC and the SPGs learn of facility changes outside MAPP's system to ensure the impact of parallel path flows are considered in the planning studies;
- (j) ensure SPG studies meet NERC/MRO Planning Standards and requirements; and
- (k) promote stakeholder (*i.e.* Regulators, Environmental Agencies, and load and generation developers) involvement in development of the Subregional Plan.

**6.5 Submission of Member Plans to SPG.** Each Transmitting Utility Member, as that term is defined in the Restated Agreement, shall submit its transmission plans to the SPG in which its system is geographically located, or SPGs in situations where its system crosses several SPG boundaries. The TPSC requires that all Members submit their individual Member Plans to the appropriate SPG. Each SPG member must be willing to participate in joint SPG studies to assess the adequacy of proposed Member Plans to best meet the needs of the subregion. The TPSC will not be in a position to support the transmission Member Plans of any Member who does not make such Member Plans available to the SPG.

**6.6 Requests for Transmission Service.** In some instances a Member may have to respond to urgent requests for transmission service. The SPG shall make every reasonable effort to review the Member's proposed Member Plans in a timely manner. Upon completion of its review and acceptance of the Member Plans, the SPG shall add these facilities to its Subregional Plan. The TPSC will evaluate these plans for regional impacts.

**6.7 SPG Meetings.** Each SPG should meet at least twice annually to review plans and determine what changes, if any, need to be made to coordinate Member Plans among Members. SPG meetings, other than those necessary to review Design Review Subcommittee studies or where CEII or confidentiality concerns are implicated, shall be open to all MAPP Members, non-Members and Regulatory Participants that have an interest in the transmission facilities in the sub-region. Recommendations carried forward to the TPSC by the SPG should reflect a consensus of the SPG members. However, a SPG member also has the right to reflect a minority opinion in any report to the TPSC. The notice of SPG meetings are to be sent out by the SPG TPSC liaison person or the SPG Chair to the RTC Membership via the RTC exploder email list. The notice shall state the time and place of the meeting, and shall include an agenda sufficient to notify Members of the substance of matters to be considered at the meeting. Additionally, the appropriate sub-regional regulatory and public participants, who are not RTC Members or may not be subscribed to the RTC exploders list, are to be sent a meeting notice.

- 6.8 TPSC/SPG Communication.** Each recognized SPG shall appoint a liaison to the TPSC to facilitate communication of the planning process. The liaison person can be any SPG member including an elected TPSC member. The form of communication the TPSC expects from the SPG includes: (a) SPG Meeting Agendas; (b) SPG final approved Meeting Minutes; and (c) SPG liaison status reports to the TPSC at the scheduled meetings. The SPG meeting agendas and approved minutes should be electronically sent to the TPSC Secretary for posting on the MAPP website in the RTC/TPSC area. The SPG status reports are given by the TPSC liaison at the scheduled TPSC meetings.
- 6.9 SPG Planning Responsibilities.** The SPG shall develop a coordinated subregional transmission plan (the SPG Plan), including alternatives, for the ensuing ten years, for all transmission facilities in the subregion at a capacity of 100 kV or greater. This SPG Plan shall be submitted to the TPSC biennially, each even numbered or MAPP Regional Plan year. The SPG shall update and modify the SPG Plan, as required, between biennial planning year cycles and submit these modifications to the TPSC for approval. The Subregional Plan should: (a) identify load serving problems in the subregion; (b) identify constrained interface problems within the subregion and with neighboring subregions and regions; (c) identify transmission needs for new generation; (d) propose and study transmission expansion alternatives to address these problems and needs; and (e) recommend the preferred alternatives which best address the subregional requirements to the TPSC; (f) address subregional deficiencies identified in the MAPP Regional Plan; and (g) provide feedback assessment of impacts of the published MAPP Regional Plan on the subregion.
- 6.10 Planning Criteria.** The MAPP Restated Agreement states that each Member's plan shall conform to applicable reliability standards and requirements, and to applicable methods and assessment practices and other transmission planning standards and requirements established by the RTC. In this context, the Subregional Plan shall conform to the requirements of the MAPP Members Reliability Criteria and Study Procedures Manual and the NERC and MRO Planning Standards. In instances where these Standards are different, the more stringent Standard shall be adopted. Such criteria and standards are available at [www.mapp.org](http://www.mapp.org).
- 6.11 SPG Study Models.** Whenever possible, the SPGs shall adopt the most current approved regional model series to develop their base case study models. Each series provides near term, five-year and ten-year models representing summer peak, summer off-peak and winter peak system conditions. The SPG shall determine the appropriate load conditions (summer peak, summer off-peak, winter peak, etc.) and generation schedules for the SPG studies. The SPG shall verify that the load data, new generation data, and all existing firm transactions in the subregion are included and correct. The TPSC will adopt the most current approved regional model series to prepare the MAPP Regional Plan or the update to the MAPP Regional Plan. In developing the base case load flow models to be

used for the SPG studies, the SPG shall document all modifications required to load flow cases. The SPGs may add underlying transmission detail to these models as required. The SPG may, if appropriate, adopt other models to conduct its studies. However, the SPG shall develop and provide the TPSC with appropriate files to facilitate incorporation of the Subregional Plan study data into the next regional model series that will be used by the TPSC.

- 6.12 SPG Studies and Reports.** A report summarizing the results of the Member and SPG Working Group studies shall be provided for review and consensus approval of the SPG, prior to adopting the plans of Members or the SPG study groups into the Subregional Plan. The SPG shall require its Members or its SPG Study Groups to perform system studies to demonstrate that the performance of the proposed Member and Subregional Plans meets the planning standards defined above. These studies may include, but not necessarily be limited to load flow (steady state, contingency and loss analysis), transient stability, voltage stability, small signal stability and economic analysis as deemed necessary by the SPG Members.
- 6.13 Subregional Plan Report to the TPSC.** The Subregional Plan, or modifications to the SPG Plan, shall be provided to the TPSC each year. A report shall be provided describing the Subregional Plan. This report shall include the following information: (a) an executive summary (to be incorporated into the MAPP Regional Plan report); (b) a description of needs being addressed; (c) a description of the alternatives considered; (d) recommendations as to which alternatives should be included in the MAPP Regional Plan; (e) a brief description of the SPG studies, including costs, supporting the recommendations, with reference to the detailed SPG study report; (f) a description of the new facilities; and (g) a description of the Public Input/Review Process.

## **7.0 Public Input Process**

- 7.1 Public Participation.** The TPSC shall invite Members, any actual or potential users of the relevant transmission facilities, neighboring transmission owning utilities, and Regulatory Participants to be part of the planning process. The SPG shall invite such interested parties to SPG meetings as part of the public input process into the Subregional Plan. The SPG shall:
- (a) maintain a list of Public Participants involved in the review and approval of additions to the Transmission System in their subregion;
  - (b) identify comparable contacts from interconnected NERC regions;
  - (c) coordinate with the regulatory and environmental participants as to the process required, areas of needs, and possible solutions;
  - (d) review the solutions with the participants to identify the best options from a transmission and regulatory basis for that subregion to include in the Subregional Plan; and

- (e) report to the TPSC the public process completed for the Subregional Plan.

**7.2 Regulatory Participation.** The TPSC shall encourage and facilitate input from Regulatory Participants, in the development of the MAPP Regional Plan. The SPGs, as part of the formal process for the Regulatory Participation, shall:

- (a) Maintain a list of public participants involved in the review and approval of additions to the Transmission System in their subregion.
- (b) Maintain a list of comparable contacts from interconnected regions (e.g., SPP to Nebraska or SPP to Iowa).
- (c) Coordinate with the regulatory and environmental participants as to the process required, areas of needs, and possible solutions. Review the solutions with the participants to identify the best options from a transmission and regulatory basis for that subregion to include in the MAPP Regional Plan.
- (d) Describe in the Subregional Plan how the proposed facilities address the needs, and identify the regulatory participants involved in the Subregional Plan development and what future regulatory approvals are required for development of facilities in the Subregional Plan.

The Transmission Planning Subcommittee (TPSC), as part of the formal process for the Regulatory Participation, shall:

- (a) maintain a list of public participants involved in the review and approval of additions to the Transmission System for each SPG;
- (b) report in the MAPP Regional Plan the public input obtained in developing the MAPP Regional Plan;
- (c) present the results of the MAPP Regional Plan and the needed facilities to the Regional Transmission Committee (RTC);
- (d) work with the Members and SPGs on final approvals for needed projects as required and coordinate any regional information that needs to be disseminated;
- (e) post the MAPP Regional Plan on the MAPP web page, making it available to the public and regulatory community subject to applicable CEII restrictions; and
- (f) as required, sponsor information seminars to facilitate regulatory and public acceptance of the MAPP Regional Plan.

## **8.0 Regional Coordination**

The TPSC shall coordinate on planning issues with: (1) the subcommittees of the RTC; (2) the Midwest Reliability Organization (MRO); (3) relevant non-MAPP neighboring transmission owning utilities and Regional Transmission Organizations (“RTOs”).

Members of the TPSC who also are members of the MAPP DRS, MRO and neighboring RTOs will be responsible to coordinate the activities of mutual interest. Such a liaison member will report on the relevant activities of these MAPP RTC, MRO and neighboring RTO subcommittees at each TPSC meeting, and will communicate TPSC activities to the MAPP RTC, MRO and neighboring RTO subcommittees. In the event there are no TPSC members on the MAPP RTC, MRO and RTO Subcommittees, the TPSC will select a TPSC member who will be responsible for reporting on the relevant activities of these subcommittees at each TPSC meeting. The TPSC correspondent may attend the MAPP RTC, MRO and neighboring RTO subcommittee meetings or employ other effective means to obtain the required information.

## **9.0 Member Plans.**

The procedures, standards and requirement for making available Members' transmission plans ("Member Plans") and the information on which the Member Plans are based, as required by the Restated Agreement. Members may submit information to the TPSC individually, but submittals through the SPGs are preferred. The SPGs provide a forum for members to continue their long-term joint planning relationships with their neighbors, and involve regulatory staff. It is in each Member's interest to participate in a SPG directly. The Member plans will be integrated into the SPG Subregional Plan. The Subregional Plan report will contain details of each Member's Plans in the text, and as reported on Forms 1-4 (see SPG Guidelines).

The Subregional Plan reports, and subsequent updates, are posted on the MAPP web page at [www.mapp.org](http://www.mapp.org). Detailed Member planning reports and/or SPG specific project study reports referenced in the Subregional Plan are also posted. Such reports typically provide details of economic evaluations, extensive alternative evaluations and supporting technical studies. Additionally, the TPSC report on the MAPP Regional Plan will provide an executive summary report of the Member and SPG Plans showing the anticipated transmission expansions in the region. This report, also posted on the MAPP web page, will provide insight into Member Plans.

## **10.0 Dispute Resolution**

All substantive and procedural disputes related to the MAPP Regional Planning Process shall be resolved in accordance with the dispute resolution procedures set forth in the MAPP Restated Agreement. Disputes related to local planning issues shall be resolved in accordance with the dispute resolution procedures set forth in this Tariff.

## **11.0 Economic Planning Studies**

The TPSC shall evaluate limitations on MAPP transfer capability through historical Transmission Loading Relief ("TLR") analysis associated with the defined flowgates in the MAPP region. The TPSC shall utilize these comprehensive reviews to determine transmission constraints in the region. The TPSC shall also support economic studies necessary to review the integration of large proposed generation facilities to the regional grid and shall develop concept plans as part of regional study efforts.

The TPSC may also commission SPGs and joint SPGs to address highly constrained regional flowgates and to develop proposed plans for increasing interregional transfer capability. SPGs may also perform regional transfer capability analysis and develop exploratory transmission expansion plans to address the most limiting flowgates within their SPG region. The TPSC may also coordinate and support other joint exploratory economic planning efforts within and adjacent to the MAPP Region.

In addition to these types of studies, stakeholders, through the TPSC, may request that the TPSC perform economic planning studies to evaluate potential upgrades or other investments that could reduce congestion or integrate new resources and loads on an aggregated or regional basis. The TPSC shall review such proposals and select a certain number for study each year. The TPSC may cluster or batch requests for economic planning studies so the TPSC can perform the studies in the most efficient manner. Requests for studies shall be submitted to the chairman of the TPSC. All such requests will be collected over a 12 month period ending January 1 of each year. The TPSC (with stakeholder input) will commit and engage to address up to five requests per year. The TPSC will attempt to combine the scope of such requests such that the scope of actual study work will adequately address multiple requests, so as not to exceed three studies. Requesting parties would be required to submit essential data for their requested study.

As part of this process, the TPSC may also consider economic studies of upgrades to MAPP flowgates. The flowgates studied will be selected among those determined to have recurring congestion, as evidenced by a high number of hours per year with no available firm Available Flowgate Capacity (“AFC”) or a high number of historical hours per year under Transmission Loading Relief (“TLR”). Along with stakeholder input, the TPSC will use these or similar metrics to determine which MAPP flowgates are most congested and warrant study of the economic benefits of proposed flowgate upgrades. Any economic planning study, which identifies a new MAPP region transmission facility or the upgrade of an existing transmission facility as a proposed Economic Network Upgrade, shall identify the proposed upgrade subject to the cost allocation principles set forth in Section 12 of this Attachment K. Such economic study shall also include a benefit allocation analysis based on one or more of the following principles: (a) reductions in projected congestion costs; (b) reductions in projected energy costs; (c) reductions in projected transmission losses.

The economic planning studies performed by the TPSC shall include sensitivity analyses representing various generation price scenarios; however, the TPSC shall study the cost of congestion only to the extent it has information to do so. If a stakeholder requests that a particular congested area be studied, it must supply relevant data within its possession to enable the TPSC to calculate the level of congestion costs that is occurring or is likely to occur in the near future.

## **12.0 Cost Allocation**

**12.1 Categories of Projects.** The TPSC will identify cost responsibility on a regional and sub-regional basis for Network Upgrades identified in the MAPP Regional Plan for reliability and economic projects subject to any grandfathered project

provisions from pre-existing agreements. There will be three categories of projects:

**12.1.1 Baseline Reliability Projects (BRP):** Baseline Reliability Projects are Network Upgrades identified in the base case as required to ensure that the Transmission System is in compliance with applicable North American Electric Reliability Corporation (NERC) reliability standards and reliability standards adopted by Midwest Reliability Organization (MRO) and applicable to the Transmission Provider.

**12.1.2 New Transmission Access Projects:** New Transmission Access Projects are defined as Network Upgrades identified in Facilities Studies and agreements pursuant to requests for transmission delivery service or transmission interconnection service under a member Transmission Provider's Tariff. New Transmission Access Projects include projects that are needed to maintain reliability while accommodating the incremental needs associated with requests for new transmission or interconnection service, as determined in Facilities Studies associated with such requests. New Transmission Access Projects are either Generation Interconnection Projects or Transmission Service Projects.

**12.1.2.1 Generation Interconnection Projects:** Generation Interconnection Projects are New Transmission Access Projects that are associated with either the interconnection of new generation, or an increase in the generating capacity of existing generation, under a Transmission Provider's Tariff.

**12.1.2.2 Transmission Service Projects:** Transmission Service Projects are New Transmission Access Projects that are needed to provide for requests for new Point-To-Point Transmission Service, or requests under a member Tariff for Network Service or a new designation of a Network Resource(s).

**12.1.3 Regionally Beneficial Projects (RBP):** A Regionally Beneficial Project is a transmission network upgrade that shall be: (i) proposed in accordance with the MAPP Planning Process; (ii) found to be eligible for inclusion in the MAPP Regional Plan; (iii) determined not to be a Baseline Reliability Project or New Transmission Access Project; and (iv) found to have regional benefits.

**12.2 Cost Allocation.** The allocation rules for these projects are as follows:

**12.2.1 Allocation of Baseline Reliability Project Costs.** Each transmission owner is obligated to construct and/or upgrade those Baseline Reliability Project facilities required to meet NERC and MRO Reliability Standards

associated with serving its native load customers and to meet its firm transmission commitments. Costs associated with a single transmission provider shall be recovered through that transmission provider's rate recovery method. Costs associated with Baseline Reliability Projects involving multiple transmission owners shall be shared among the affected transmission owners in accordance with this principle and subject to those transmission owners' respective interconnection agreements. It should be noted that MAPP transmission owners historically have developed corrective plans to meet NERC and regional planning criteria. Also, MAPP transmission owners have historically constructed reliability facilities, as needed, in accordance with such corrective plans.

**12.2.2 New Transmission Access Projects.** New Transmission Access Projects may consist of a number of individual facilities that constitutes a single project for cost allocation purposes. Cost allocation methods applicable to specific requests for interconnection and transmission service under the Tariff shall be used for Transmission Access Projects.

**12.2.3 Allocation Rules for Regionally Beneficial Projects (RBP).** The MAPP Regional Plan shall classify transmission projects as described above. Any economic planning study authorized by the MAPP RTC for a Regionally Beneficial Project and performed in compliance with Section 11 of this Attachment K, which identifies the need for a new MAPP region transmission facility or the upgrade of an existing transmission facility as a proposed Economic Network Upgrade, shall treat such proposed facility upgrade(s) as commercial transmission.

This procedure ("Procedure") describes the process by which the MAPP transmission owner on whose transmission system the Economic Network Upgrade is located (Host TO) shall solicit participation for the proposed Economic Network Upgrade. The MAPP transmission owner shall have the right to elect to be an Affected System and not the Host TO, provided that the MAPP RTC identifies another qualified transmission owner as the Host TO. A transmission owner that has protested a project as causing undue burden, which has not been satisfactorily resolved, has the option to decline participation.

**12.2.3.1 Applicability.** This Procedure is applicable to MAPP-Region transmission owners and MAPP-Region Load-Serving Entities ("LSEs").

**12.2.3.2 Host Owner Option.** The Host TO may, of its own accord, elect to perform the defined Economic Network Upgrade, and roll the upgrade costs into the next update of its transmission revenue requirements.

### 12.2.3.3

**First Call Offer of Subscription Rights.** The Host TO shall submit an offer to participate in the Economic Network Upgrade to LSEs within the Host TO's zone, including its merchant load-serving affiliate, to other MAPP Affected System Operators, and to any Affected System Operators participating on a reciprocal basis in accordance with the benefit allocation defined on a cost causation basis in the economic planning studies performed in compliance with Section 11 of this Attachment K, in exchange for Subscription Rights to the new transmission capacity.

Each Affected System Operator receiving such an offer shall have the right to offer on its OASIS on a non-discriminatory basis to LSEs on its transmission system, including its merchant load-serving affiliate, the opportunity to participate in the Economic Network Upgrade by purchasing a portion of the Subscription Rights made available by such Affected System Operator. If the Affected System Operator's affiliated LSE accepts the subscription offer for participation in the Economic Network Upgrade, the subscription shall be granted to such LSE as a Subscription Rights buyer. The cost of such subscription shall not be included in the transmission revenue requirement of the Affected System Operator, unless the Subscription Rights Buyer requires the upgrade to serve load on the Affected Systems. All Subscription Rights Buyers may use Appendix A to determine the applicable revenue requirements for their participation in the project (*Appendix A to Attachment K, revenue requirement template, is still under development.*) If demand within the Affected System Operator's zone for the Subscription Rights offered exceeds the number of Subscription Rights available, the Affected System Operator shall offer such Subscription Rights to the interested LSEs within its zone pro rata, based on coincident peak. Each LSE shall have 60 days to accept such an offer for Subscription Rights.

If the LSE(s) of a Affected System Operator that has received a Subscription Rights solicitation rejects all or part of the solicitation, the Affected System Operator may, at its sole option, seek expedited pre-approval from its end-use rate-making authority to include the cost of such Subscription Rights in its retail rates. The Host TO, MAPP Affected System Operators and any Affected System Operator participating on a reciprocal basis shall be allowed an additional 60 days to seek pre-approvals from their respective rate-approving authorities.

If the Affected System Operator receiving the offer for participation is unable to commit to acquisition of all the subscription rights offered within 120 days, the Affected System Operator shall inform the Host TO of what portion of the subscription offer, if any, will be subscribed to by its LSE(s),

including its merchant LSE(s), and what portion, if any, will be subscribed to by its transmission business unit.

Any capacity offered for subscription that remains unsubscribed after 120 days shall be released back to the Host TO.

- 12.2.3.4 Second Round Offer of Subscription Rights.** The Host TO shall release any Subscription Rights that remain unsubscribed to other participating Affected System Operators, which shall be allowed 30 days to indicate interest in acquiring the residual Subscription Rights, either for their LSEs, or for their respective transmission business units. If the Subscription Rights offered are acquired by an Affected System Operator's LSE(s), the value of such Subscription Rights will not be included in the Affected System Operator's transmission rates. If the Subscription Rights offered are acquired by an Affected System Operator's transmission business unit, the revenue requirements shall be based on Appendix A to this Attachment K and the revenue requirements will be rolled into the Affected System Operator's rate structure and the acquired transmission capacity shall be available under the Affected System Operator's OATT. The Affected System Operator, including the Host TO, shall adjust the point-to-point and network service charges to reflect the addition of any Appendix A revenue requirements to the Affected System Operator's OATT embedded cost rates.
- 12.2.3.5 Subscription Rights Auction.** If any Subscription Rights remain available after the Host TO has taken the steps above, all such remaining Subscription Rights shall be auctioned to any eligible transmission customer.
- 12.2.3.6 Resale and Reassignment of Subscription Rights.** The Host TO shall provide resale and reassignment provisions for Subscription Rights on the same basis as provided in the *pro forma* OATT for firm point-to-point transmission service.
- 12.2.3.7 Failure to Obtain Subscriptions.** If all of the efforts described above have been fully exhausted and Subscription Rights sufficient to cover the total cost of the Economic Network Upgrade project have not been successfully subscribed, or if subscribers default as discussed below, the Host TO may cancel the proposed project. If a project is cancelled under such circumstances, the Host TO shall notify all of the subscribers in writing within 30 days of its decision to terminate. If an Economic Network Upgrade is terminated for lack of subscriptions or for defaults on subscriptions, the project shall be deemed to have insufficient economic benefit to market participants, and the project shall not

qualify for reconsideration as an Economic Network Upgrade until the latter of a) the next biennial MAPP Regional Plan planning cycle, or b) two years from the date of notice of cancellation.

**12.2.3.8 Facilities Agreement.** If the Economic Network Upgrade is fully subscribed, the Host TO shall offer the subscribers a Facilities Agreement within 60 days of full subscription. If any of the subscribers fail to execute the Facilities Agreement within 30 days of receipt of such agreement, the Host TO shall use its best efforts to award the non-signing subscriber's Subscription Rights to another qualifying interested party. If the Host TO is unable to secure an alternative subscriber, the Host TO shall pursue resolution with the non-signing/defaulting subscriber(s) pursuant to Article 9, Dispute Resolution, of the MAPP Restated Agreement. Any dispute that has not been resolved through the MAPP Article 9 Dispute Resolution process shall be resolved through the appropriate regulatory or jurisdictional dispute resolution proceedings. A party seeking to invoke FERC jurisdiction over a Dispute shall file with the Commission the Facilities Agreement unexecuted by the non-signing/defaulting subscriber. The Commission shall determine the obligations of the non-signing/defaulting subscriber. If, as a result of the dispute resolution process the non-signing/defaulting subscriber is relieved of its obligations, the Host TO may cancel the project with no further obligations to the remaining subscribers.

**12.2.3.9 Completion of Economic Network Upgrades.** Once an Economic Network Upgrade is fully subscribed and Facilities Agreements are in place for all subscribers, the Host TO shall apply good faith efforts to obtain approvals for, design, construct, own, operate and maintain the proposed Economic Network Upgrade facilities under the terms and conditions set forth in the Facilities Agreement(s).

**12.2.3.10 Inter-Regional Coordination.** This Procedure may be applied for inter-regional Economic Network Upgrades demonstrating inter-regional economic benefits. MAPP Transmission Owners may use this Procedure to fulfill any requirements of reciprocal obligations for inter-regional transmission upgrades identified by the planning processes of adjacent regional entities, including but not limited to the Midwest ISO Transmission Expansion Plan. This Procedure shall also be available to transmission owners in adjacent regions that may be invited to participate in a subscription rights offering from a MAPP Transmission Owner, based on demonstrations of benefits under Section 11 of this Attachment K.

## **13. Local Planning Process**

### **13.1. Introduction**

Omaha Public Power District (“OPPD,” <http://www.oppd.com>) is a member of the Mid-Continent Area Power Pool (“MAPP,” <http://www.mapp.org>) which is a FERC recognized Regional Transmission Group (“RTG”) and generation reserve sharing pool. The Midwest Reliability Organization (“MRO,” <http://www.midwestreliability.org>) is the Regional Reliability Organization in which OPPD is a member. In addition to the internal planning processes which are undertaken by OPPD T&D Planning, MAPP and the MRO coordinate regional planning processes in which OPPD T&D Planning participates.

OPPD Transmission and Distribution Planning (“T&D Planning”) is responsible for developing the plans by which the OPPD T&D system is expanded or altered. OPPD T&D Planning functions are located in Omaha, Nebraska and T&D Planning personnel can be contacted by sending correspondence to OPPD’s corporate headquarters at: Omaha Public Power District, Attn: T&D Planning, ECC-5, 444 S 16th Street Mall, Omaha, Nebraska 68102. Additional contact information is available on the OPPD corporate website indicated above.

### **13.2. OPPD Transmission Planning**

#### **13.2.1. OPPD Member Plan**

The OPPD Member Plan is a transmission plan that includes all current and anticipated requirements for transmission service for firm point-to-point transactions, network service customers, and OPPD native load customers for approximately a 10 year period. This plan is submitted to the MAPP Nebraska Sub-regional Planning Group (“NSPG”) every two years for inclusion in the MAPP Transmission Planning Subcommittee (“TPSC”) biennial regional plan. OPPD submits an annual update to the NSPG and the MAPP TPSC. The OPPD Member Plan, as submitted to the MAPP NSPG, and any plan updates are available on the OPPD OASIS. Any updates or information requested by MAPP Regional Transmission Committee (“RTC”) members will be posted on the OPPD OASIS to insure simultaneous notification.

#### **13.2.2. Availability of Plans and Information**

The OPPD transmission planning process utilizes the latest set of available computer models developed by the MRO. OPPD discloses the manner in which it treats its retail native load customers as well as wholesale customers in the MRO models. These models reflect all of the information available to OPPD regarding load projections 10 years into the future, and all firm transactions including the ones for the municipalities within OPPD’s service territories. Entities desiring access

to these models should contact the MRO.

In most cases, OPPD will not provide detailed information (e.g. power flow models) directly to entities that are not members of the MAPP RTC or are not known by OPPD to be legitimate market participants. This approach is intended to prevent disclosure of Critical Energy Infrastructure Information, “CEII,” to entities that are not legitimate market participants. OPPD will refer such entities to MAPP as MAPP has an established CEII policy and non-disclosure policies.

FERC has indicated that Standards of Conduct will take precedence over the planning principle of openness with regard to criteria, assumptions, and data. OPPD will therefore not provide information to entities that may act as a pipeline of information to energy trading and marketing personnel.

Entities that require information regarding the status of transmission system upgrades to the OPPD transmission system should make a request for such information to OPPD T&D Planning at the address included above. The request should identify which entity requires the information, the specific transmission system upgrade for which information is being requested, and specific questions to be answered by OPPD. Responses to such inquiries will be posted on the OPPD OASIS for a period of at least 30 days so long as disclosure of such information does not jeopardize the security of the transmission system.

### **13.2.3. Planning Standards & Criteria**

The basic criteria used by OPPD in its T&D Planning activities are available to all customers and other stakeholders through the NERC Reliability Standards, MRO Reliability Standards, and MAPP Members’ Reliability Criteria and Study Procedures Manual.

The assumptions and data that underlie OPPD’s T&D Planning activities are consolidated in the MRO power flow models. OPPD participates in the MRO annual model building process which is undertaken by the MRO Model Building Subcommittee (“MBS”). The MRO MBS models are generated in Siemens PTI PSS/E software.

OPPD must follow the MAPP study policies and procedures of the MAPP Design Review Subcommittee (“DRS”) in order to seek approval for planned modifications to the transmission system, whether generation interconnection or decommissioning, line construction or removal, autotransformer additions or removals, or similar modification.

### **13.3. Local Planning Process**

#### **13.3.1. OPPD Member Plan Development Process**

The OPPD transmission planning process has 6 basic steps. These are:

1. Identify existing or potential problems
2. Review risk of identified problems
3. Prioritize study based on timing and risk magnitude
4. Perform in-depth analysis of the problem
5. Recommend a solution.

Problems are defined as thermal overloads or abnormal voltage conditions that cannot be mitigated within the limitations of the applicable standards. The applicable standards are applied to equipment with operating voltages of 100kV or higher. Equipment operated below 100kV is preferred to be operated within the same limitations as equipment operated above 100kV, but the standards are not strictly applied.

Existing or potential problems identified in the OPPD Member Plan may have originated as a result of:

1. Large-scale regional studies associated with generation interconnections and transmission service requests
2. Day-to-day operations and outage request review
3. Regional seasonal assessments
4. Specific stakeholder inquiries
5. Condition assessments (line condition inspections, clearance inspections)

#### **13.3.2. Timeline for OPPD Member Plan Development**

The OPPD member plan is flexible to allow for new information such as new loads, new generation, or other system changes to be integrated into the plan. The current OPPD member plan is written every two years with an annual update for reporting to the NSPG.

Work on the biennial report and annual update supplied to the NSPG is started in April of each year, and a final report is supplied by the NSPG to the MAPP TPSC by September 1. Therefore, any entity that requests to have projects considered for inclusion in the biennial plan or the annual update to the plan should have completed their project studies and submitted study documentation to OPPD before April.

#### **13.3.3. Model Preparation**

The model building activities undertaken by OPPD are coordinated by the

Model Building Subcommittee (“MBS”) of the MRO.

The MBS will typically send out initial requests for data to the MRO member utilities in mid-September for data to support the model development for the following year’s model series. Customers, affected state authorities, and other stakeholders that desire to provide input to the MRO models should deliver their data to OPPD no later than September 30. Data should be sent to OPPD T&D Planning at: Omaha Public Power District, Attn: T&D Planning ECC 5, 444 S 16th Street Mall, Omaha, Nebraska 68102.

OPPD will send its data, along with any relevant data provided by other entities, that is to be incorporated into the following year’s model series to the MBS by approximately December 1. The MBS will attempt to have a final set of models compiled by mid-March for final review by the member utilities. The MRO must submit the final model series to NERC by mid-July for compliance with NERC requirements.

#### **13.3.4. OPPD Data Collection from Stakeholders**

When the MRO model building process begins, municipals within the OPPD service area are asked to provide their projected load, generation, and any purchases or sales to be included the models.

#### **13.4. Regional and Sub-regional Coordination**

OPPD coordinates its transmission system planning efforts with regional transmission providers and transmission users through participation in the Nebraska Sub-regional Planning Group. The operation of MAPP Sub-regional Planning Groups and the MAPP Transmission Planning Subcommittee are detailed in sections 4, 5, and 6 above.

OPPD, and all other electric utilities in Nebraska, are required to receive approval for construction of generation, transmission, and, in some cases, distribution from the Nebraska Power Review Board (“NPRB,” <http://www.nprb.state.ne.us/>). OPPD frequently communicates about T&D Planning activities with neighboring utilities and state authorities in order to give early notification of transmission system expansion options under consideration. These efforts are important to prevent conflict and resolve technical issues before submission to the NPRB and before significant engineering efforts have been invested. All stakeholders, including private citizens, in the state of Nebraska have the opportunity to voice concerns to the NPRB.

#### **13.5. Public Input to OPPD Planning Process**

In order to insure that existing and potential users of the OPPD transmission system are given adequate opportunity to express their current and future

transmission needs, OPPD will hold open transmission planning forums each year in the month of January, May, and September. Notice of these events will be posted on the OPPD website at [www.oppd.com](http://www.oppd.com) and on the OPPD OASIS. People or organizations desiring to participate in these forums need to contact OPPD personnel at least 3 weeks prior to the event.

Existing and bona fide potential transmission customers are encouraged to communicate their transmission needs to OPPD at any time. Existing and potential users of the OPPD transmission system can contact T&D Planning personnel by sending correspondence to OPPD's corporate headquarters at: Omaha Public Power District, Attn: T&D Planning ECC-5, 444 S 16th Street Mall, Omaha, Nebraska 68102. Additional contact information is available on the OPPD corporate website indicated above.

In the event that OPPD must construct or is considering construction of a large facility that may impact members of the public or organizations, OPPD will hold public hearings in order to allow individuals and organizations to voice their concerns and influence the final planning decisions.

### **13.6. Dispute Resolution**

The *OPPD Dispute Resolution Process for Transmission Planning Issues Under FERC Jurisdiction* established here is solely for the purpose of addressing transmission planning disputes as recognized and required by FERC Order No. 890. This process can be utilized to address both procedural and substantive transmission planning issues. This process cannot be utilized for purposes that are not within the jurisdiction of FERC such as how retail native loads are served or disputes arising from the site selection for electric facilities.

Should an entity decide that it has a dispute with OPPD regarding the handling of transmission system planning, notice should be sent to OPPD T&D Planning at the following address: Omaha Public Power District, Attn: T&D Planning ECC-5, 444 S 16th Street Mall, Omaha, Nebraska 68102.

Within 30 days of receipt of the entity's complaint, OPPD will determine whether the dispute is correctly directed to OPPD or if the dispute falls under the responsibility of MAPP. If the dispute is the responsibility of MAPP, the entity filing the dispute will be informed as to the basis of this decision and asked to redirect their dispute to MAPP.

If a planning dispute is correctly directed to OPPD, OPPD T&D Planning may request additional information from the entity filing the dispute and determine whether OPPD agrees with the dispute as filed. If OPPD determines that the entity filing the dispute has in actuality been treated in a manner that is not comparable to other customers, OPPD T&D Planning will notify the entity filing the dispute within 30 days and begin working with the entity to resolve the inequity. If OPPD does not believe that the entity filing the dispute has been

treated in a way that is not comparable to other customers, OPPD will notify the entity of the reasoning for this determination within 30 days.

If the entity filing the dispute still believes that it has been treated in a way that is not comparable to other customers, the entity should notify OPPD T&D Planning that their dispute is not considered resolved and request a meeting to be held in person in Omaha, Nebraska. The entity filing the dispute can request that a member of OPPD executive management participate in the meeting provided that the entity is also represented by a member of their executive management.

If the result of this meeting is that a dispute still exists between the entity filing the dispute and OPPD, the entity filing the dispute may request arbitration by contacting OPPD T&D Planning at the address above. If OPPD agrees to arbitration, the process of soliciting arbitration will be in a well-known, customary manner agreeable to both parties. The arbiter shall render a decision within 90 days from the start of the arbitration. The costs of arbitration services will be split between OPPD and the entity filing the dispute. OPPD will in no case be liable for the internal costs of the entity filing the dispute associated with the entity's preparation for arbitration or their participation in the arbitration.

Nothing in this section is intended to restrict the rights of any party or to prevent any party from filing a complaint with FERC pursuant to the Federal Power Act.

### **13.7. Economic Planning Studies**

Customers may request that economic planning studies be performed to evaluate potential upgrades or other investments in the OPPD transmission system that could reduce "significant and recurring" congestion or integrate new resources and loads. Formal requests for such studies must be sent to OPPD T&D Planning at this address: Omaha Public Power District, Attn: T&D Planning ECC-5, 444 S 16th Street Mall, Omaha, Nebraska 68102.

Requests need not be associated with specific requests for transmission service. OPPD may refer a study requestor to the MAPP TPSC to have a certain study performed if OPPD and the study requestor agree that the MAPP TPSC is more correctly the organization with the information and resources to perform a more complete and accurate study.

OPPD's transmission tariffs do not include the costs of economic planning studies or studies to integrate new resources and loads. Therefore, all such studies will be performed at the expense of the requestor and such expense will be the cost to OPPD to perform the study internally or to hire a third-party consultant to perform the analysis plus any administrative or technical costs incurred by OPPD. The third-party consultant, if employed, will be selected at the sole discretion of OPPD.

The OPPD OASIS will indicate what economic study requests have been received

and the order in which they were received. The order of receipt will determine precedence.

Individual requests must include the following information:

1. The name of the entity making the formal request.
2. The basis upon which the entity believes that it is entitled to request the performance of the study.
3. A deposit of US\$100,000, the balance of which will be refunded to the requestor at the time the study report is made available on the OPPD OASIS. If the cost of the study exceeds the amount of the deposit, the requestor must remit the balance of the cost to OPPD before the results of the studies are published on the OPPD OASIS. No interest shall be payable by OPPD for retaining a deposit. OPPD T&D Planning reserves the sole right to waive a portion or all of the deposit requirement.
4. A detailed description of the significant and recurring congestion to be analyzed. Requests for analyses of geographically or electrically separate cases of significant and recurring congestion must be made in separate formal requests.
5. Detailed data supporting the assertion that significant and recurring congestion exists.
6. Detailed data regarding the economic impacts of the significant and recurring congestion.
7. Detailed descriptions of solutions to mitigate or eliminate significant and recurring congestion that the requesting entity wishes to have evaluated.
8. Contact information for the entity's representatives that wish to be involved in the study process and analyses.

Such studies WILL NOT report on:

1. Cost responsibility for implementation of a solution, or
2. Whether a solution should be implemented at all.

Such studies WILL report on:

1. Location and a description of the magnitude of congestion,
2. Options to mitigate or eliminate the identified congestion,
3. The cost of options identified to mitigate or eliminate the identified congestion, and
4. The costs of congestion (to the extent that information has been supplied by the requestor).

Options to eliminate or mitigate significant and recurring congestion that reduce, jeopardize, or otherwise impair the reliability of the interconnected transmission system will not be considered.

The reports resulting from these study requests will be posted on the OPPD OASIS. Information regarding the identity of the requestor will not be included

in the report, but cost information provided by the requestor as required by FERC Order 890 will be included. Reports will be made available on the OPPD OASIS.

### **13.8. Cost Allocation**

Costs for projects for transmission facilities that are studied, planned, constructed, owned, and operated completely by OPPD within the OPPD service territory will be recovered under the OPPD tariff or the MAPP Schedule F tariff.

OPPD may, at its sole discretion, agree to enter into cost sharing agreements with other entities in the State of Nebraska which are permitted to own and operate transmission facilities within the state of Nebraska.

### **13.9. Planning Authority**

OPPD T&D Planning retains ultimate responsibility for the planning of the OPPD T&D system. OPPD reserves final decision authority over all decisions related to the OPPD T&D system.