# PJM/MISO Cost Allocation For Economic Upgrades



# Stakeholder Meeting Midwest ISO, Carmel, IN

June 16, 2008





#### **Topics for Discussion**



Internal RTO Economic Processes (RTO Staffs)

MISO/PJM Straw Proposal (RTO Staffs)

Review Stakeholder Proposals (All)

Stakeholder Discussion (All)

Next Steps (All)







### **Internal PJM Economic Process**





#### **Process Overview**

### **Annual Benefit Metric**

# Annual Benefit = (.7)(△System Production Cost)+(.3)(△Load Energy Payment)

- ASystem Production Cost is change in system generation variable cost (fuel costs, variable O&M costs and emissions costs) associated with total PJM energy production
- ALoad Energy Payment is change in net load energy payment (change in gross load payment minus change in transmission right credit)
  - For projects that have costs allocated regionally (500 kV and up), the load energy payment for all PJM zones is considered
  - For projects that have costs allocated using a flow-based methodology (below 500 kV), the load energy payment for only those PJM zones that show a decrease in load energy payment is considered





# Process Overview (cont.)

# Simulation/Model Details

- Annual market simulations made with and without upgrade for future years 1, 4, 7 and 10 (current year (cy), cy+3, cy+6 and cy+9)
- Annual benefits within the 10-year time frame for years which were not simulated interpolated using these simulation results
- Annual benefits for years beyond the 10-year simulation time frame based on an extrapolation of the market simulation results for years 1, 4, 7 and 10
- A higher-level annual market simulation made for future year 15 (cy+14) to validate the extrapolation results and extrapolation of annual benefits for years beyond the 10-year simulation time frame may be adjusted accordingly









# Cost/Benefit Analysis

- Present value of annual project benefit for first 15 years of project life compared to present value of annual project cost for first 15 years of project life
- Project is considered economic and included in RTEP if B/C ratio exceeds 1.25:1





# Example of Benefit Calculation for Single Year

| _        | Delta Gross<br>Load Payment  | Delta<br>FTR Credit | Delta Net<br>Load Payment |
|----------|------------------------------|---------------------|---------------------------|
| Zone     | (\$Millions)                 | (\$Millions)        | (\$Millions)              |
| ACEC     | -15.4                        | -0.5                | -14.9                     |
| AEP      | 224.4                        | 99.0                | 125.4                     |
| APS      | 42.7                         | -429.9              | 472.6                     |
| BG&E     | -217.7                       | -36.7               | -180.9                    |
| COED     | 146.4                        | -3.4                | 149.8                     |
| DOM      | -555.6                       | -372.6              | -183.0                    |
| DP&L     | 27.5                         | -6.5                | 33.9                      |
| DPLC     | -30.2                        | -3.8                | -26.4                     |
| DQE      | 59.1                         | 21.2                | 37.9                      |
| JC       | -23.6                        | -7.7                | -15.9                     |
| ME       | -22.8                        | -16.4               | -6.4                      |
| PECO     | -52.6                        | 2.3                 | -54.8                     |
| PEPCO    | -256.2                       | -16.5               | -239.7                    |
| PN       | 39.2                         | -9.3                | 48.4                      |
| PPL      | -38.2                        | -26.7               | -11.5                     |
| PSEG     | -46.7                        | -1.7                | -45.0                     |
| RECO     | -1.3                         | 0.0                 | -1.3                      |
| Neptune  | -5.0                         | 0.0                 | -4.9                      |
| Total    | -726.0                       | -809.4              | 83.4                      |
| Sum of N | Neg Values = <b>-1,265.2</b> | Sum of              | Neg Values = -784.7       |

**Delta System Production Cost** -\$153.3 M

Delta Gross Generator Revenue = Delta System Congestion Costs = -\$809.4 M

Benefit = (.7)(\$153.3M) + (.3)(-83.4) = \$82.3M

(for 500 kV and above)

**Annual Benefit Metric Calculation** 

Benefit = (.7)(\$153.3M) + (.3)(\$784,7) = \$342.7M(for below 500 kV)





### Annual Benefit / Annual Costs

| _ |  |  |
|---|--|--|
|   |  |  |
|   |  |  |
|   |  |  |

| Year | Calendar<br>Year | Annual<br>Production<br>Cost Savings<br>(\$M) | Annual Net<br>Load<br>Payment<br>Savings<br>(\$M) | Annual<br>70%/30%<br>Benefit<br>(\$M) | Annual Cost<br>(\$M) |
|------|------------------|---|---|---------------------------------------|----------------------|
| 1*   | 2007             | 153.3   | -83.4   | 82.3                                  |                      |
| 2    | 2008             | 149.1   | -111.9  | 70.8                                  | 200                  |
| 3    | 2009             | 144.9   | -140.3  | 59.3                                  | 200                  |
| 4*   | 2010             | 140.8   | -168.8  | 47.9                                  | 200                  |
| 5    | 2011             | 165.1   | -68.5   | 95.0                                  | 200                  |
| 6    | 2012             | 189.4   | 31.8  | 142.1                                 | 200                  |
| 7*   | 2013             | 213.7   | 132.2   | 189.2                                 | 200                  |
| 8    | 2014             | 230.6   | 314.0   | 255.7                                 | 200                  |
| 9    | 2015             | 247.6   | 495.9   | 322.1                                 | 200                  |
| 10*  | 2016             | 264.6   | 677.8   | 388.6                                 | 200                  |
| 11   | 2017             | 267.7   | 613.3   | 371.3                                 | 200                  |
| 12   | 2018             | 281.2   | 699.4   | 406.7                                 | 200                  |
| 13   | 2019             | 294.8   | 785.6   | 442.0                                 | 200                  |
| 14   | 2020             | 308.4   | 871.7   | 477.4                                 | 200                  |
| 15   | 2021             | 321.9   | 957.9   | 512.7                                 | 200                  |
| 16   | 2022             | 335.5   | 1,044.1   | 548.1                                 | 200                  |
| 17   | 2023             | 349.0   | 1,130.2   | 583.4                                 | 200                  |
| 18   | 2024             | 362.6   | 1,216.4   | 618.7                                 | 200                  |
| 19   | 2025             | 376.2   | 1,302.5   | 654.1                                 | 200                  |

C/B analysis uses 15 years of project costs and benefits starting with project in-service year

<sup>\*</sup> Simulation Year





# **NPV** Analysis



- Present value of annual project benefit for first 15 years of project life compared to present value of annual project cost for first 15 years of project life
- Project is considered economic and included in RTEP if B/C ratio exceeds 1.25:1

15 year NPV benefit 1,731.1
Project NPV cost (\$1,039.0
15 Year Net Benefit \$692.1

B/C Ratio = 1,731 / 1,039 = 1.66 > 1.25







### **Internal MISO Economic Process**





#### **Benefit Metric**



Benefit Metric is calculated on region level (MISO East, Central and West Region).

For each hour, calculate the region's Load Cost Saving, and region's Adjusted Production Cost Saving.

Region's Load Cost Saving: is the change in load energy payment (Load \* Load LMP)

Region's Adjusted Production Cost Saving: is the change of Region's Adjusted Production Cost, which equals:

Region's Production Cost (fuel costs, variable O&M costs and emissions costs)

+ Region's Purchase \* Region Load Weighted LMP (if it purchase at

that hour)
- Region's Sale \* Region Generation Weighted LMP (if it sales at that hour)

Region's Annual Benefit = 70% \* Region's Annual Adjusted Production Cost Saving + 30% \* Region's Annual Load **Cost Saving** 





# Study Year

- MISO Tariff Language: "minimum of 10 years of benefits with a maximum 20 year horizon model"
- For a project with ISD of 2011, we will run PROMOD for: the in service year (2011), 5 years after (2016) and 10 years after (2021). For the years between, these 3 years, we will use the linear interpolation based 3 years values.





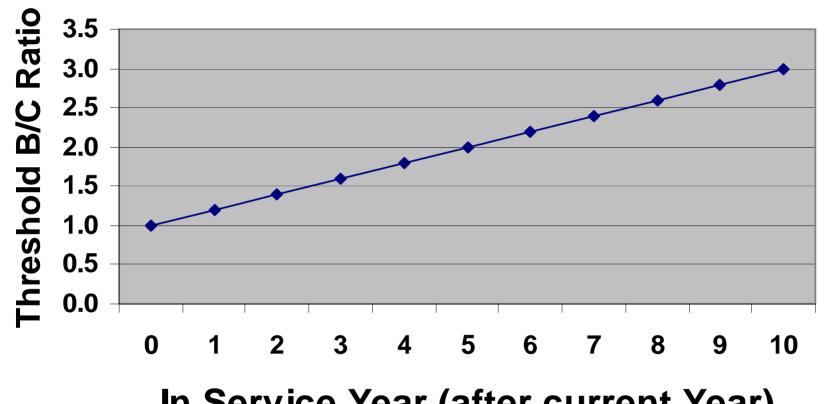
#### Benefit/Cost Ratio

- Present value of MISO's annual benefit (sum of regions') for the first 11 years (2011 to 2021 if ISD is 2011) of project life compared to present value of annual project cost for first 11 years of project life
- The threshold B/C ration increases linearly with the time until planned in-service date.





#### **RECB II B/C Ratio**









### **Cost Allocation**

Twenty percent (20%) of the Project Cost of the Regionally Beneficial Project shall be allocated on a system-wide basis to all Transmission Customers and recovered through a system-wide rate.

Eighty percent (80%) of the costs of the Regionally Beneficial Projects shall be allocated on a sub rgion-wide basis to all Transmission Customers in each of the three defined Planning Sub Regions. The region with negative total NPV benefit will not share any portion of these 80% cost.

Example 1:

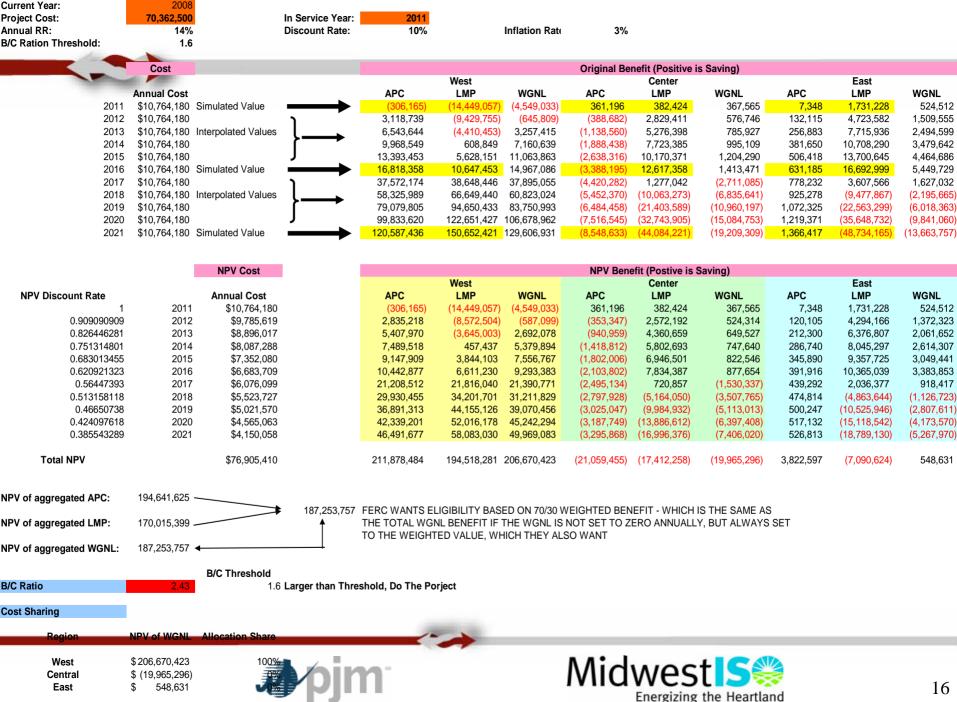
Total NPV Benefit: East: M\$100; Central: M\$200, West: M\$300 Then Cost Allocation: East: 16.67%, Central: 33.33%, West: 50%

Example 2:

Total NPV Benefit: East: M\$-100; Central: M\$200, West: M\$300 Then Cost Allocation: East: 0%, Central: 40%, West: 60%







**Total NPV** 

\$207,219,053



# MISO/PJM Economic Planning Process Straw Proposal







- Differences in the internal processes of PJM and Midwest ISO
- Proposals to merge areas of difference into a common cross-border approach
- Straw proposal
- Issues needing further discussion to reach common ground





#### Differences



#### Benefit metric

PJM uses 70% Prod Cost + 30% Net LMP<sub>load</sub> MISO uses 70% Adj. Prod Cost + 30% Gross LMP<sub>load</sub>

#### Benefit to cost ratio threshold

PJM: 1.25

MISO: linear function of in-service date (2.0 for 5 year, 3.0 for 10 year)

#### Qualifying project voltage

PJM: voltages 100 kV and above

MISO: voltages 345 kV and above

### Qualifying project (or allocated) cost ("materiality")

PJM internal:

MISO internal: \$5 M Project Direct Cost Estimate

Cross border Reliability: \$10 M minimum allocated

#### Years studied for benefit determination

PJM: future years 1, 4, 7, 10; Interpolation for interim years; Extrapolation beyond year 10

MISO: In-service date year (ISD), ISD + 5, ISD + 10; Interpolation for interim; max 20 year horizon

#### Allocation

PJM: 500 kV and above regionalized by load ratio share; below 500 kV?

MISO: 20% regionalized load ratio share; 80% using Benefit Metric to each of 3 Subregions (W, C, E)





#### Proposed Resolution of Process Differences



#### Benefit metric

Use 70% Adj. Prod Cost + 30% Net LMP<sub>load</sub>
Adj. PC would be evaluated for the aggregate super-region
Adjustment would account for any changes in economic purchases or sales between the super-region and the outside world, to the extent modeled (modeling assumptions yet to be addressed fully)
Net LMP<sub>load</sub> estimated using reduction in aggregate super-region LMP<sub>Gen</sub>

#### Benefit to cost ratio threshold

Use: 1.25

Lower B/C ratio appropriate together with using LMP<sub>load</sub> net of transmission rights

### Qualifying project voltage

Use: voltages 100 kV and above

Qualifying project (or allocated) cost ("materiality")

Use: \$20 M Project Direct Cost Estimate

#### Years studied for benefit determination

Use: In-service date year (ISD), ISD + 5, ISD + 10; Interpolation for interim years; Extrapolation to year 15





#### **Straw Proposal Principles**



## **Principles**

- Allocation method does not necessarily need to be based on same metric used to determine project value/benefit
- A cross border project should show sufficient value to each RTO to be treated as cross border, otherwise develop using internal processes/tariffs
- Benefits to each RTO should be evident for each simulated year to improve stakeholder confidence in project benefits
- Project should pass a super-region cost/benefit test, as well as, internal RTO cost-benefit tests





#### Straw Proposal Overview



- 1. Project must pass super-region benefit/cost test
  - PV of a single region-wide benefit metric must exceed PV of total project cost by pre-defined threshold
- 2. Project must show sufficient, consistent benefits to both RTOs
  - Measure benefit to both RTOs and determine if measures are consistent and significant for both RTOs
  - allocate costs based on this measure
- 3. Project must pass internal RTO benefit/cost test
  - Use existing internal RTO metrics and RTO costs from step 2 to determine if project passes internal RTO benefit/cost test





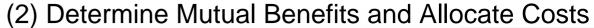




- Measure change in total system production cost (weighted 70%) plus change in total system net load payment (weighted 30%) where total system is the combined MISO + PJM systems
  - Adjust production cost for any changes in economic purchases or sales between the super-region and the outside world, to the extent modeled
  - Net load payment change estimated using change in gross generator revenue
- Compare PV of 15 years of benefits to PV of 15 years of total project costs
- Project passes super-region B/C test if B/C ratio greater than 1.25









- Measure change in zonal gross load payments and determine each RTOs share of the total load payment decreases of benefiting zones
- If each RTOs share of the total load payment decreases of benefiting zones is consistent and significant then allocate project cost based on each RTOs share
  - Each RTOs share of the total gross load payment savings for zones showing a decrease in gross load payment considered to be consistent and significant if at least 20% of the total for each simulated year









- From the simulations made to determine super-region benefit, pull the data needed to calculate annual benefit metrics used in individual RTO test
  - Adjusted production cost and gross load payment for MISO
  - Production cost and net load payment for PJM
- Apply internal RTO test to costs allocated to RTO in Step 2
- Project must pass both internal RTO tests in order to be recommended as a cross-border economic project





#### Straw Proposal Example Annual Simulation Results

| _ | - | - |   |
|---|---|---|---|
|   |   |   | 2 |
|   | - |   |   |

| RTO  | Zone     | Delta<br>Gross Gen Rev<br>(\$Millions) | Delta<br>Prod Cost<br>(\$Millions) | Estimated Delta Adjusted PC (\$Millions) | Delta Gross<br>Load Payment<br>(\$Millions) | Delta<br>FTR Credit<br>(\$Millions) | Delta Net<br>Load Payment<br>(\$Millions) |
|------|----------|--|------------------------------------|--|---|-------------------------------------|---|
| MISO | Zone 1   | -13.4                                  | -7.1                               | -8.8                                     | -15.4                                       | -0.5                                | -14.9                                     |
| MISO | Zone 2   | 359.6                                  | 104.6                              | -42.2                                    | 224.4                                       | 99.0                                | 125.4                                     |
| MISO | Zone 3   | 506.8                                  | 120.3                              | -23.2                                    | 42.7  | -429.9                              | 472.6                                     |
| MISO | Zone 4   | -211.4                                 | -41.4                              | -52.4                                    | -217.7                                      | -36.7                               | -180.9                                    |
| MISO | Zone 5   | 190.2                                  | 44.9                               | -13.7                                    | 146.4                                       | -3.4                                | 149.8                                     |
| MISO | Zone 6   | 36.7                                   | 11.2                               | 7.0                                      | 27.5  | -6.5                                | 33.9                                      |
| MISO | Zone 7   | -230.6                                 | -73.5                              | -113.2                                   | -256.2                                      | -16.5                               | -239.7                                    |
| MISO | SUBTOTAL | 637.9                                  | 159.0                              | -246.6                                   | -48.3                                       | -394.5                              | 346.2                                     |
| PJM  | Zone 1   | -467.4                                 | -233.2                             | -168.1                                   | -555.6                                      | -372.6                              | -183.0                                    |
| PJM  | Zone 2   | -36.7                                  | -21.2                              | -15.8                                    | -30.2                                       | -3.8                                | -26.4                                     |
| PJM  | Zone 3   | 84.2                                   | 8.9                                | -24.8                                    | 59.1  | 21.2                                | 37.9                                      |
| PJM  | Zone 4   | -7.8                                   | 2.3                                | -12.2                                    | -23.6                                       | -7.7                                | -15.9                                     |
| PJM  | Zone 5   | -29.9                                  | -10.3                              | -0.8                                     | -22.8                                       | -16.4                               | -6.4                                      |
| PJM  | Zone 6   | -112.1                                 | -34.0                              | 8.7                                      | -52.6                                       | 2.3                                 | -54.8                                     |
| PJM  | Zone 7   | 129.4                                  | 6.2                                | -78.3                                    | 39.2  | -9.3                                | 48.4                                      |
| PJM  | Zone 8   | -43.5                                  | -11.9                              | 8.2                                      | -38.2                                       | -26.7                               | -11.5                                     |
| PJM  | Zone 9   | -70.8                                  | -19.0                              | -3.7                                     | -46.7                                       | -1.7                                | -45.0                                     |
| PJM  | Zone 10  | 0.0                                    | 0.0                                | -6.3                                     | -6.3  | -0.1                                | -6.2                                      |
| PJM  | SUBTOTAL | -554.5                                 | -312.3                             | -292.9                                   | -677.7                                      | -414.9                              | -262.8                                    |
|      | TOTAL    | 83.4                                   | -153.3                             | -539.5                                   | -726.0                                      | -809.4                              | 83.4                                      |

Super-region Straw Parameters







#### **Annual Simulation Results**

|          | Delta            | Delta        |
|----------|------------------|--------------|
|          | Net Load Payment | Prod Cost    |
| RTO      | (\$Millions)     | (\$Millions) |
| Combined | 83.4             | -153.3       |

Benefit Metric = 
$$(.7)$$
(Delta Prod Cost) +  $(.3)$ (Delta Net Load Payment<sup>(1)</sup>)  
=  $(.7)$ (\$153.3M) +  $(.3)$ (-\$83.4M) = \$82.3M

(1) On a total system basis, Delta Gross Gen Rev can be used in place of Delta Net Load Payment under assumption that all congestion charges are rebated back to load via transmission rights credits





# Straw Proposal Example (1) Super-region Benefit/Cost Test (cont.)



|      | Annual<br>Production<br>Cost Savings | Annual Net<br>Load<br>Payment<br>Savings | Annual<br>70%/30%<br>Benefit | Annual Cost |
|------|--------------------------------------|--|------------------------------|-------------|
| Year | (\$M)                                | (\$M)                                    | (\$M)                        | (\$M)       |
| 1    | 153.3                                | -83.4                                    | 82.3                         | 200         |
| 2    | 149.1                                | -111.9                                   | 70.8                         | 200         |
| 3    | 144.9                                | -140.3                                   | 59.3                         | 200         |
| 4    | 140.8                                | -168.8                                   | 47.9                         | 200         |
| 5    | 165.1                                | -68.5                                    | 95.0                         | 200         |
| 6    | 189.4                                | 31.8                                     | 142.1                        | 200         |
| 7    | 213.7                                | 132.2                                    | 189.2                        | 200         |
| 8    | 230.6                                | 314.0                                    | 255.7                        | 200         |
| 9    | 247.6                                | 495.9                                    | 322.1                        | 200         |
| 10   | 264.6                                | 677.8                                    | 388.6                        | 200         |
| 11   | 267.7                                | 613.3                                    | 371.3                        | 200         |
| 12   | 281.2                                | 699.4                                    | 406.7                        | 200         |
| 13   | 294.8                                | 785.6                                    | 442.0                        | 200         |
| 14   | 308.4                                | 871.7                                    | 477.4                        | 200         |
| 15   | 321.9                                | 957.9                                    | 512.7                        | 200         |

Compare PV of 15 years of total system benefit to 15 years of total system costs

Project passes super-region benefit/cost test if B/C ratio > 1.25





#### Straw Proposal Example

#### (2) Determine Mutual Benefits and Allocate Costs



|      |          | Delta Gross  |
|------|----------|--------------|
|      |          | Load Payment |
| RTO  | Zone     | (\$Millions) |
| MISO | Zone 1   | -15.4        |
| MISO | Zone 2   | 224.4        |
| MISO | Zone 3   | 42.7         |
| MISO | Zone 4   | -217.7       |
| MISO | Zone 5   | 146.4        |
| MISO | Zone 6   | 27.5         |
| MISO | Zone 7   | -256.2       |
| MISO | SUBTOTAL | -48.3        |
| PJM  | Zone 1   | -555.6       |
| PJM  | Zone 2   | -30.2        |
| PJM  | Zone 3   | 59.1         |
| PJM  | Zone 4   | -23.6        |
| PJM  | Zone 5   | -22.8        |
| PJM  | Zone 6   | -52.6        |
| PJM  | Zone 7   | 39.2         |
| PJM  | Zone 8   | -38.2        |
| PJM  | Zone 9   | -46.7        |
| PJM  | Zone 10  | -6.3         |
| PJM  | SUBTOTAL | -677.7       |
|      | TOTAL    | -726.0       |

| Delta Gross<br>Load Payment<br>(\$Millions) |        |
|---|--------|
| -15.4                                       | 1.2%   |
| -217.7                                      | 17.2%  |
| -256.2                                      | 20.2%  |
| -489.3                                      | 38.7%  |
| -555.6                                      | 43.9%  |
| -30.2                                       | 2.4%   |
| -23.6                                       | 1.9%   |
| -22.8                                       | 1.8%   |
| -52.6                                       | 4.2%   |
| -38.2                                       | 3.0%   |
| -46.7                                       | 3.7%   |
| -6.3  | 0.5%   |
| -775.9                                      | 61.3%  |
| -1,265.2                                    | 100.0% |

Use RTO share of the total gross load payment savings for zones showing a decrease as measurement of consistent, mutually beneficial results

Allocate project cost based on RTO share of the total gross load payment savings for zones showing a decrease

MISO receives 38.7% of project cost and PJM receives 61.3% cost and these costs are tested against internal RTO B/C test





# Straw Proposal Example (3) Individual RTO Benefit/Cost Test



|      |          | Delta<br>Gross Gen Rev | Delta<br>Prod Cost | Estimated Delta Adjusted PC | Delta Gross<br>Load Payment | Delta<br>FTR Credit | Delta Net<br>Load Payment |
|------|----------|------------------------|--------------------|-----------------------------|-----------------------------|---------------------|---------------------------|
| RTO  | Zone     | (\$Millions)           | (\$Millions)       | (\$Millions)                | (\$Millions)                | (\$Millions)        | (\$Millions)              |
| MISO | Zone 1   | -13.4                  | -7.1               | -8.8                        | -15.4                       | -0.5                | -14.9                     |
| MISO | Zone 2   | 359.6                  | 104.6              | -42.2                       | 224.4                       | 99.0                | 125.4                     |
| MISO | Zone 3   | 506.8                  | 120.3              | -23.2                       | 42.7                        | -429.9              | 472.6                     |
| MISO | Zone 4   | -211.4                 | -41.4              | -52.4                       | -217.7                      | -36.7               | -180.9                    |
| MISO | Zone 5   | 190.2                  | 44.9               | -13.7                       | 146.4                       | -3.4                | 149.8                     |
| MISO | Zone 6   | 36.7                   | 11.2               | 7.0                         | 27.5                        | -6.5                | 33.9                      |
| MISO | Zone 7   | -230.6                 | -73.5              | -113.2                      | -256.2                      | -16.5               | -239.7                    |
| MISO | SUBTOTAL | 637.9                  | 159.0              | -246.6                      | -48.3                       | -394.5              | 346.2                     |
| PJM  | Zone 1   | -467.4                 | -233.2             | -168.1                      | -555.6                      | -372.6              | -183.0                    |
| PJM  | Zone 2   | -36.7                  | -21.2              | -15.8                       | -30.2                       | -3.8                | -26.4                     |
| PJM  | Zone 3   | 84.2                   | 8.9                | -24.8                       | 59.1                        | 21.2                | 37.9                      |
| PJM  | Zone 4   | -7.8                   | 2.3                | -12.2                       | -23.6                       | -7.7                | -15.9                     |
| PJM  | Zone 5   | -29.9                  | -10.3              | -0.8                        | -22.8                       | -16.4               | -6.4                      |
| PJM  | Zone 6   | -112.1                 | -34.0              | 8.7                         | -52.6                       | 2.3                 | -54.8                     |
| PJM  | Zone 7   | 129.4                  | 6.2                | -78.3                       | 39.2                        | -9.3                | 48.4                      |
| PJM  | Zone 8   | -43.5                  | -11.9              | 8.2                         | -38.2                       | -26.7               | -11.5                     |
| PJM  | Zone 9   | -70.8                  | -19.0              | -3.7                        | -46.7                       | -1.7                | -45.0                     |
| PJM  | Zone 10  | 0.0                    | 0.0                | -6.3                        | -6.3                        | -0.1                | -6.2                      |
| PJM  | SUBTOTAL | -554.5                 | -312.3             | -292.9                      | -677.7                      | -414.9              | -262.8                    |
|      | TOTAL    | 83.4                   | -153.3             | -539.5                      | -726.0                      | -809.4              | 83.4                      |

Internal PJM Parameters

Internal MISO Parameters





# Straw Proposal Example (3) Individual RTO Benefit/Cost Test (cont.)



#### **MISO Internal RTO B/C Test**

- Benefit = (.7)(\$246.6M) + (.3)(\$48.3M) = \$187.1M
- Compare to 38.7% of project cost

#### PJM Internal RTO B/C Test

- Benefit = (.7)(\$312.3M) + (.3)(\$262.8M) = \$297.5M
- Compare to 61.3% of project cost

- Project must pass both internal RTO tests in order to be recommended as a cross-border economic project
- Cost allocated within RTO based on internal RTO process





### **Next Steps**



Stakeholder feedback on ability to reach consensus in time for August 1, 2008 FERC filing



