



Stephen J. Rourke
Vice President, System Planning

May 17, 2010

Mr. Hantz Presume
Vermont Electric Power Company, Inc.
366 Pinnacle Ridge Road
Rutland, VT 05701

Re: TCA Application VELCO-08-TCA-02: Request for Pool-Supported PTF Cost Treatment for Southern Loop Project; ISO New England Written Findings and Determination

Dear Mr. Presume:

This letter provides the determination of ISO New England Inc. (“ISO”) in connection with the transmission cost allocation application dated December 10, 2008 and (the “Application”)¹ submitted by the Vermont Electric Power Company, Inc. (“VELCO”) pursuant to Schedule 12C of Part II of the ISO New England Inc. Transmission, Markets and Services Tariff² and ISO Planning Procedure 4 (“PP-4”).³

The Application under review involves the costs associated with the construction of 53 miles of new 345 kV transmission circuits and the construction of two new substations at Vernon and Newfane, and the expansion of the Coolidge substation (collectively the “Southern Loop Project” or the “Project”).⁴ This Project’s proposed

¹ The Application is posted on the ISO’s website at: http://www.iso-ne.com/pubs/pubcomm/forums/2009/tca_stakeholder_mtg_jan292009/velco-08-tca-02_southern_tca_form.pdf.

² Hereinafter, the “ISO Tariff.” Capitalized terms not defined in this determination have the meanings ascribed thereto in the ISO Tariff, the Second Restated New England Power Pool Agreement, and the Participants Agreement.

³ The current version of PP-4 is posted on the ISO’s website at: http://www.iso-ne.com/rules_proceeds/isone_plan/pp4_0_r4.pdf.

⁴ More specifically, the major elements of the Project are as follows: (i) VELCO will build 53 miles of new 345 kV line, in two line segments: one from the new Vernon substation to the Newfane substation (18 miles) and one from the Newfane substation to the Coolidge substation (35 miles); (ii) VELCO will construct a new 345 / 115 kV substation at Vernon (a 4-bay, 11-breaker 345 kV substation, and a 5-breaker ring bus 115 kV substation) at which the existing 340, 379, 381 and K-186 lines will be terminated, and which will have a new 448 MVA, 345/115 kV transformer and new 345 and 115 kV lines to connect the Vernon substation with the Vermont Yankee substation (at which the 345 kV protection & control will be

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facilities are to be constructed in a number of different locations throughout southern Vermont with an expected in-service date of June 2011.

I. SUMMARY OF THE ISO DETERMINATION

As explained in this determination letter, the ISO finds that all of the \$241,480,906 requested by VELCO are properly categorized as Pool-Supported PTF Costs under Schedule 12C of the ISO Tariff.

II. OVERVIEW OF SCHEDULE 12C

As described in greater detail below, the Southern Loop Project was developed in the New England planning process in order to address significant reliability issues on the transmission system. The Project is rated at 115 kV and above, meets the non-voltage criteria for PTF, and is included in the Regional System Plan (“RSP”) as a Reliability Transmission Upgrade (RSP Project ID’s 323, 1032, 1035, 1033 and 1034).⁵ The costs of the Project therefore qualify for treatment as Pool Supported PTF costs, subject to the identification of Localized Costs pursuant to the ISO Tariff.⁶

The ISO’s role in determining Localized Costs is defined by Schedules 12 and 12C of Section II of the ISO Tariff, and PP-4. Schedule 12 requires the ISO to review Regional Benefit Upgrades and identify any Localized Costs associated with them, noting that Localized Costs “shall not be included in the Pool-Supported PTF costs recoverable under this OATT”⁷ Schedule 12C provides that “[t]he ISO shall determine what those reasonable requirements are that are consistent with Good Utility Practice and the current engineering design and construction practices in the area in which the Transmission Upgrade is built [and that] [t]he costs of Transmission Upgrades that exceed those reasonable requirements . . . shall be deemed Localized Costs.”⁸

In discussing the factors the ISO must consider when making its determination of whether Localized Costs exist, Schedule 12C and PP-4 provide that, with advisory input from the Reliability Committee, the ISO will consider the reasonableness of the proposed design and construction method with respect to:

(...continued)

upgraded); and (iii) VELCO will construct a new Newfane substation to include a three-breaker 345 kV ring bus. VELCO will modify the Coolidge substation by adding four new 345 kV breakers to create a breaker-and-a-half configuration. Eight existing 115 kV breakers, as well as associated switches and disconnects, will be replaced with 3000 amp equipment.

⁵ These are the elements of a “Regional Benefit Upgrade” as listed at ISO Tariff § II.1.119.

⁶ See ISO Tariff Section II, Schedule 12, § 7. (ISO required to review Regional Benefit Upgrades pursuant to Schedule 12C).

⁷ *Id.*

⁸ See ISO Tariff Section II, Schedule 12C, § 1.

- a) Good Utility Practice;
- b) current engineering design and construction practices in the area in which the Project is proposed to be built/is being built;
- c) allowing for appropriate expansion and load growth;
- d) alternate feasible and practical transmission alternatives; and
- e) the relative costs, operation, efficiency, reliability and timing of implementation of the proposed Project.

Section II of the ISO Tariff utilizes the following definition for Good Utility Practice:

Any of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition. Good Utility Practice is not intended to be limited to the optimum practice, method, or act to the exclusion of all others, but rather includes all acceptable practices, methods, or acts generally accepted in the region.⁹

PP-4 also clarifies that a “feasible and practical transmission alternative means a transmission alternative that is feasible and practical from an *engineering design and construction perspective*.”¹⁰ Also, “[a]n alternative that is not or may not be approved by a siting or local review board may still be considered a feasible and practical transmission alternative[.]”¹¹ The ISO will consider an “[a]ssessment of the schedule or in-service date of the Project *from an engineering and construction standpoint* rather than from the standpoint of potential delays in local or state siting.”¹²

⁹ See ISO Tariff § II.1.35.

¹⁰ See PP-4, § 1.6.1(d)(i) (emphasis added).

¹¹ *Id.* (emphasis added).

¹² PP-4, Attachment A (emphasis added).

Attachment A to PP-4 also provides guidance regarding Localized Costs. Included in Attachment A is a non-exclusive list of examples illustrating the portions of a Project that may be considered Localized Costs.¹³

In other words, Schedule 12C directs the ISO to determine whether the estimated costs of a proposed project exceed the estimated costs of an alternative project that provides similar performance and that is consistent with Good Utility Practice and feasible and practical to be designed and constructed from an engineering standpoint. The fact that it may be difficult or impossible from a state or local statutory, regulatory, or political perspective to convince a relevant governmental body to allow the applicant to build such an alternative is irrelevant, because this outcome would be unrelated to engineering design and construction or Good Utility Practice issues.

The ISO's determination of Localized Costs is based primarily on the types of expenditures proposed. Such cost estimates are relevant to the ISO, not for ratemaking purposes, but rather for determining the presence of Localized Costs by analyzing, for example, whether a Project will cost more than a transmission alternative with equally robust power system performance. However, an ISO finding that certain proposed expenses do not constitute Localized Costs should in no way be interpreted as a determination by the ISO that such estimates are accurate and should automatically be included in the regional transmission revenue requirement collected by Participating Transmission Owners ("PTOs") through Attachment F of Section II of the ISO Tariff, since that revenue requirement is based on actual costs (either already incurred or forecasted but trued-up, with interest). The PTOs are responsible for including the proper supporting information and detail in their annual informational filing as required by Attachment F and its Implementation Rule. In cases that there is an ISO finding of Localized Costs, it does not prohibit a PTO from seeking to include such expenditures in its rates for Local Service under Schedule 21 of the Tariff.

In addition, the ISO's determination that certain costs do not constitute Localized Costs is not, and should not be interpreted as a finding with regard to the prudence of those costs.¹⁴ The review and determination of prudence of a given cost is an area

¹³ As previously noted, Attachment A to PP-4 makes clear that "all relevant costs" would not include "potential delays in local or state siting."

¹⁴ The Federal Power Act allows public utilities to exercise broad discretion in incurring costs necessary to serve their customers. The test is whether the expenditures "are costs which a reasonable utility management (or that of another jurisdictional entity) would have made, in good faith, under the same circumstances, and at the relevant point in time." *New England Power Co.*, 31 FERC ¶ 61,047 at p. 61,084 (1985), *aff'd sub nom. Violet v. FERC*, 800 F.2d 280 (1st Cir. 1986). The public utility is presumed to have acted prudently, "absent a showing of inefficiency or improvidence." *Id.* at p. 61,082.

subject to regulatory review by the Federal Energy Regulatory Commission (“FERC” or the “Commission”).¹⁵

III. OVERVIEW OF THE DEVELOPMENT OF THE PROJECT THROUGH THE REGIONAL PLANNING PROCESS AND SUMMARY OF THE PROJECT

A. Identification of Reliability Issues and Development of the Southern Loop Solution Through the Regional Planning Process

In order to qualify for regional cost treatment under the ISO Tariff as a Regional Benefit Upgrade, a project must meet an identified reliability need on the transmission system and be included in the Regional System Plan.¹⁶ A brief review of the regional planning process and the development of the Southern Loop Project through that process is included in this determination.

ISO New England is the independent, not-for-profit Regional Transmission Organization¹⁷ and the federally-authorized planning authority for the electric transmission system in the New England Control Area.¹⁸ The ISO conducts its planning process pursuant to Attachment K¹⁹ of Section II of the ISO Tariff.²⁰

The regional system planning process is designed to ensure the reliability of the New England Transmission System and compliance with national and regional planning

¹⁵ *Id.* at p. 61,084 (noting that it is the Commission’s duty to determine the prudence of a public utility’s challenged expenditures).

¹⁶ See ISO Tariff § II.1.119. As discussed in Section III.B. below, a project must also be approved under the Proposed Plan Application (“PPA”) reliability review process under ISO Tariff § I.3.9.

¹⁷ *ISO New England Inc.*, 110 FERC ¶ 61,111 (2005) (authorizing RTO operations).

¹⁸ *ISO New England Inc. & New England Power Pool, Order on Reh’g Requests and Compliance Filings*, 95 FERC ¶ 61,348 (2001) (authorizing the ISO to oversee regional transmission planning). With regard to the ISO’s authority to review and approve proposed changes to the system on a technical basis, see *New England Power Pool and ISO New England Inc.*, Order Accepting Compliance Filing, 103 FERC ¶ 61,304 (2003) (“[ISO] is the appropriate authority to approve planning for transmission upgrades and changes to supply and demand-side resources.”).

¹⁹ The ISO created its Attachment K planning procedures in compliance with *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, at P 893 (“Order No. 890”), *order on reh’g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh’g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh’g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009). See *ISO New England Inc.*, 123 FERC ¶ 61,161 (2008) (accepting the ISO’s Attachment K filing, subject to further compliance filings).

²⁰ Prior to the implementation of Attachment K in compliance with Order No. 890, the ISO conducted its planning process in accordance with Section 48 of Section II of the ISO Tariff. The text’s description of the regional system planning process is taken from Attachment K, and has the same general approach as was utilized in Section 48.

standards, criteria and procedures, while accounting for market performance and economic, environmental and other considerations, as may be agreed upon from time to time.²¹ The RSP produced as a part of the regional system planning process is based on a five- to ten-year planning horizon, and reflects five-to-ten-year capacity and load forecasts. To ensure that the ISO, in conducting the regional planning process, receives the full benefit of input from all interested stakeholders, the ISO convenes multiple planning meetings over the course of a year with the Planning Advisory Committee (“PAC”), which is a stakeholder group that is open to any interested entity, including but not limited to: Transmission Customers, Market Participants, and representatives of the New England states, including regulators. A description of the PAC is provided at Section 2 of ISO Tariff Section II, Attachment K.

The reliability need for the Southern Loop Project was first highlighted in VELCO’s 2002 Northwest Reliability Project Evaluation. The Project was first listed as “Proposed” in the 2005 RSP Project List. Thereafter, VELCO prepared the 2006 Vermont Transmission System Long Range Plan (the “Plan”), as required by Vermont statute. The Plan identified the loss of the 345 kV 340 Line (connecting the Vermont Yankee and Coolidge substations) as a severe reliability concern, noting that whether the Vermont Yankee generating station is in service or not, system upgrades would be needed. More specifically, the Plan identified the following concerns:

- Loss of the Vermont Yankee to Coolidge 345 kV line (340 line) at peak load can result in unacceptable system performance, including thermal and voltage criteria violations, and potentially a voltage collapse extending into multiple states;
- Breaker failures at the Coolidge and Vermont Yankee substations involving the 340 line result in poorer system performance (worse voltage and thermal violations, and wider voltage collapse potential at lower load levels);
- Long-term loss of the sole Vermont Yankee 345 / 115 kV transformer exposes load served in southeast Vermont and southwest New Hampshire to significant loss of load for single transmission outages; and
- Load served by Central Vermont Public Service (“CVPS”) in southern Vermont is exposed to criteria violations (thermal and voltage) and potential voltage collapse for loss of the transmission supply at either Bennington or Brattleboro load pockets or for local 46 kV outages in that area.

²¹ See ISO Tariff Section II, Attachment K, § 1.

The ISO made a presentation to the PAC concerning the results of the studies undertaken as part of the Plan at the PAC's May 20, 2008 meeting.²²

The reliability need received further study by VELCO in the 2012 Transmission Planning Review (the "Review")²³ prepared to support the Proposed Plan Applications to be submitted for the Southern Loop Project, pursuant to Section I.3.9 of the ISO Tariff. The Review was premised on expected 2012 conditions and assumed (N-1-1) contingencies, as well as outage conditions on the Highgate converter and the PV20 line. The Review considered three alternatives: (1) the Southern Loop, (2) Deerfield and (3) "benchmark" alternatives.²⁴ Eighteen total base case conditions were considered. The number of contingencies for each base case ranged from 169 to 185. The performance of the Southern Loop alternative was found superior to the Deerfield option with respect to its ability to achieve feasible contingency solutions for the following outages: K186: Vermont Yankee – Vernon – Chestnut Hill; Vernon Rd.; and the K186: Vermont Yankee Breaker Failure. Similarly, the Southern Loop alternative exhibited better performance than the benchmark alternative.

Based on the foregoing analysis, the 2008 RSP described the Southern Loop Project as "specifically...intended to increase the ability to move power into Vermont when the existing 345 kV line between Vermont Yankee and Coolidge, VT, is removed from service."²⁵ The 2009 RSP noted that "[t]he 2006 Vermont Transmission System Long Range Plan identified significant system performance concerns for key contingencies occurring under heavy import conditions[, and that the Southern Loop Project includes a] number of components that address the thermal and voltage problems these contingencies would cause...."²⁶

In response to a request made at the January 29, 2009 stakeholder meeting (discussed further, below) regarding the TCA Application for the Southern Loop Project, the ISO re-evaluated the need for the project,²⁷ taking into account the lower loads forecasted in the 2009 CELT report, and the generation and demand response resources

²² A copy of the ISO's presentation at that PAC meeting is posted on the ISO's website at: http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/mtrls/2008/may202008/a_vt_lrp_5-20-08.pdf.

²³ Copies of Vermont RSP planning studies are posted on the ISO's website at: http://www.iso-ne.com/trans/sys_studies/rsp_stud/vt/index.html

²⁴ Each of the alternatives is described in detail in the Review.

²⁵ 2008 RSP at 11.

²⁶ 2009 RSP at 132.

²⁷ A copy of the presentation is posted on the ISO's website at: http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/ceii/mtrls/2009/jul162009/vermont.pdf. The presentation contains Critical Energy Infrastructure Information or "CEII" and is password protected. Access to the document can be obtained by contacting ISO Customer Service at custserv@iso-ne.com.

that cleared in the first and second Forward Capacity Auctions conducted by the ISO.²⁸ This evaluation found a continuing need for the Project, as reliability criteria violations would continue to exist even with the decreased load forecast and all New England demand response resources assumed to be in-service. The results of the re-evaluation were presented to the PAC at its July 16, 2009 meeting.²⁹

B. The Proposed Plan Applications for the Southern Loop Project

Under the terms of Schedule 12C, proponents of transmission projects that are determined to be needed for reliability reasons must complete the Proposed Plan Application process set out in Section I.3.9 of the ISO Tariff prior to submitting a TCA Application for regional cost recovery. This process provides for a review of proposed changes to the transmission system to determine if the proposed plan will have any adverse impact on the transmission system.

VELCO presented 13 PPAs at the May 21, 2008 and September 16, 2008 meetings of the NEPOOL Reliability Committee.³⁰ The applications represented the components of the Southern Loop Project and were submitted with an expected in-service date of June 2011. The Reliability Committee provided advisory input to the ISO regarding the PPAs.

On October 1, 2008, the ISO issued a letter to VELCO indicating that the implementation of their proposed projects would “not have a significant adverse effect on the stability, reliability or operating characteristics” on the transmission system.³¹

IV. FILING OF THE TCA APPLICATION; ISO AND STAKEHOLDER TCA REVIEW

On December 10, 2008, VELCO filed its TCA application pursuant to Section 12C of Section II of the ISO Tariff for the Southern Loop Project. The Application provided the information required under Schedule 12C and Attachment N of Section II of the ISO Tariff, as further detailed in Section 1.6.1 of PP-4.

²⁸ The first and second Forward Capacity Auctions were for Capacity Commitment Periods June 1, 2010 through May 31, 2011 and June 1, 2011 through May 31, 2012, respectively.

²⁹ A copy of the presentation made by the ISO regarding the re-evaluation is posted on the ISO’s website at: http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/ceii/mtrls/2009/jul162009/vermont.pdf.

³⁰ A copy of the proposed plan applications for the Southern Loop Project is posted on the ISO’s website at: http://www.iso-ne.com/committees/comm_wkgrps/reblty_comm/reblty/mtrls/2008/sep162008/zip6b_more-ppas.zip

³¹ A copy of this letter is posted on the ISO’s website at: http://www.iso-ne.com/trans/pp_tca/isone_app_approvals/prop_plan/2008/oct/laforest_southern-loop_velco-08-t01-thru-t13_and-revised-ppas.pdf.

As set out in the Participants Agreement and Schedule 12C of Section II of the ISO Tariff, and as further detailed in PP-4, the NEPOOL Reliability Committee is tasked with providing advisory input to the ISO regarding whether there are elements of a given project that should not be included in the regional network service rate for recovery because the costs are Localized Costs as described in Schedule 12C. The elements of Schedule 12C are described above in Section II of this determination.

VELCO presented information regarding the Project and its Application at the May 21, 2008 and September 16, 2008 meetings of the Reliability Committee.

In the case of major transmission projects, the ISO also holds public TCA meetings. These stakeholder meetings are in addition to the Reliability Committee advisory process and allow for any interested party to attend, ask questions or provide input regarding whether there are any Localized Costs in a given TCA application. The Southern Loop Project stakeholder meeting was conducted on January 29, 2009.³²

This review culminated in seeking an advisory vote of the Reliability Committee at its February 24, 2009 meeting. At that meeting, the motion to recommend ISO approval of estimated Pool-Supported PTF costs of \$241,480,906 (in 2011 dollars) for the Southern Loop Project passed, based on a show of hands with none opposed and one abstention in the Generation Sector and one abstention in the Supplier Sector.

V. ISO ANALYSES AND DETERMINATION

In the Application, VELCO explained that the estimated cost of the Southern Loop Project is \$264,490,000, including both costs that VELCO has determined to be non-PTF costs, and costs that were requested to be included in the Pool Supported PTF RNS rate. Exclusion of the costs identified by VELCO as non-PTF costs results in a total amount of \$241,480,906 for which treatment as Pool-Supported PTF costs are requested.

In order to determine whether any of the \$241,480,906 includes any Localized Costs that were not identified by VELCO, the ISO considered, with advisory input from the Reliability Committee and other stakeholders, the reasonableness of the proposed design and construction method with respect to: Good Utility Practice; current engineering design and construction practices in the area in which the Project is being built; appropriate expansion for load growth; practical and feasible transmission alternatives; and the relative costs, operation, efficiency, reliability and timing of implementation of the proposed Project.³³

³² The VELCO presentation for that stakeholder meeting is posted on the ISO website at: http://www.iso-ne.com/pubs/pubcomm/forums/2009/tca_stakeholder_mtg_jan292009/1_velco_tca-stakeholder_presentation.pdf.

³³ The content of the ISO's analysis under Section 12C of Section II of the ISO Tariff is described in greater detail at Section II of this determination.

The ISO has reviewed the Application, and has considered all of the materials distributed by VELCO at various Reliability Committee meetings and the January 29, 2009 special stakeholder meeting pertaining to the Project. To better understand the Project costs and potential areas of Localized Costs, the ISO issued data request letters to VELCO on February 12, 2009 and August 17, 2009.³⁴

VELCO was asked to further explain the correlation between the Southern Loop Project and the Vermont Yankee Nuclear Power Plant (“VY”) relicensing.³⁵ In response, VELCO indicated that “... the Vernon substation will be needed to serve key plant loads whether the Vermont Yankee power plant gets relicensed or not.”³⁶ Furthermore, VELCO emphasized that with the exception of relaying,³⁷ work performed at the VY substation is not included in the total amount requested as Pool-Supported PTF costs.

Additionally, VELCO was requested to provide more information regarding construction design requirements from the Vermont Public Service Board (“PSB”), specifically the request to use low noise transformers and low corona insulators. VELCO explained in their responses that the PSB request did not add cost to the Project because equipment with the requested characteristics do not carry a premium.³⁸

As with other TCA application reviews, the ISO requested additional information regarding procurement of right-of-way, environmental constraints and cost “adders” (elements of Project cost not directly related to electrical facilities such as park land, trees, bike paths, etc.). VELCO used common utility practice by returning areas affected by construction to their “pre-project” condition after Project disturbance and “in other instances provide[d] vegetative screening / landscaping commonly performed at our substation facilities and transmission lines with highway crossings.”³⁹ The ISO found VELCO’s practices pertaining to construction in environmentally sensitive areas to be appropriate.

VI. SCOPE CHANGES

Schedule 12C, Section 2 of the Section II of the ISO Tariff provides:

If the costs associated with a Transmission Upgrade exceed the estimated Pool-Supported PTF costs determined in the original Localized Cost review by ten percent, or the design associated with the construction of a

³⁴ Copies of the ISO’s requests and VELCO’s responses are posted on the ISO’s website at: http://www.iso-ne.com/trans/pp_tca/req/velco/index.html.

³⁵ VY needs to be relicensed by March 2012 in order to continue to operate.

³⁶ Response to question 1 of ISO New England’s data request dated February 12, 2009.

³⁷ Response to question 3 of ISO New England’s data request dated August 17, 2009.

³⁸ Response to question 2 of ISO New England’s data request dated August 17, 2009.

³⁹ Response to question 1 of ISO New England’s data request dated August 17, 2009.

Transmission Upgrade is materially changed subsequent to the ISO's determination of Localized Costs, then the applicant for Pool-Supported PTF costs shall be required to submit its Transmission Upgrade again to a review by ISO to determine if any of the incremental costs or costs associated with the change in design are Localized Costs.

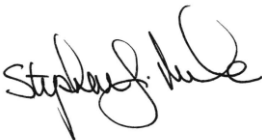
As with other projects that are early in the construction process, the ISO is concerned that the Project may present other areas of Localized Costs once the siting process is complete and the final design determined.

As explained in Section II above, an ISO finding that certain proposed expenses do not constitute Localized Costs should in no way be interpreted as a determination by the ISO that such estimates are accurate and should automatically be included in the regional transmission revenue requirement collected by the PTOs through Attachment F of Section II of the ISO Tariff. The regional revenue requirement is based on actual costs (either already incurred or forecasted but trued-up, with interest). The ISO requests that VELCO provide periodic updates on the costs of this project no less than three times per year, as prescribed in the draft Appendix D to Planning Procedure No. 4, to the Planning Advisory Committee, Reliability Committee and the ISO.

VII. CONCLUSION

In summary, the ISO finds that all of the \$241,480,906 requested by VELCO should be categorized as Pool-Supported PTF Costs. The reasons identified for this determination are consistent with the criteria set forth in Schedule 12C of the ISO Open Access Transmission Tariff for receiving regional support and inclusion in Pool-Supported PTF rates.

Sincerely,



Stephen J. Rourke
Vice President, System Planning

cc: TCApps
Reliability Committee