ATTACHMENT P

Transmission Planning Process

Overview of Western's Transmission Planning Processes

The Western Area Power Administration (Western) is a Federal agency under the Department of Energy that markets and transmits wholesale electrical power from 56 federal hydropower plants and one coal-fired plant. Western sells about 40 percent of regional hydroelectric generation in a service area that covers 1.3 million square miles in 15 states. To provide this reliable electric power to most of the western half of the United States, Western markets and transmits about 10,000 megawatts of hydropower across an integrated 17,000-circuit mile, high-voltage transmission system.

Western's customers include municipalities, cooperatives, public utility and irrigation districts, Federal and state agencies, investor-owned utilities (only one of which has an allocation of Federal hydropower from Western), marketers and Native American tribes. They, in turn, provide retail electric service to millions of consumers in Arizona, California, Colorado, Iowa, Kansas, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, South Dakota, Texas, Utah and Wyoming.

Western's role in delivering power also includes managing 10 different rate-setting systems. These rate systems are made up of 14 multipurpose water resource projects and one transmission project. The systems include Western's transmission facilities along with power generation facilities owned and operated primarily by the U.S. Bureau of Reclamation, the U.S. Army Corps of Engineers and the U.S. State Department's International Boundary and Water Commission. Western sets power rates to recover all costs associated with our activities, as well as the Federal investment in the power facilities (with interest) and certain costs assigned to power from repayment, such as aid to irrigation development.

Western employees sell power and transmission service, operate transmission and provide maintenance and engineering services. These duty locations include Western's Corporate Services Office in Lakewood, Colo., and four regions with offices in Billings, Mont.; Loveland, Colo.; Phoenix, Ariz.; and Folsom, Calif. Western also markets power from the Management Center in Salt Lake City, Utah, and also manages Upper Great Plains Region system operations and maintenance from offices in Bismarck, N.D.; Fort Peck, Mont.; Huron, S.D. and Watertown, S.D.

Since its inception on December 21, 1977, Western and its employees have been dedicated to providing public service, including promoting environmental stewardship, energy efficiency and renewable energy and implementing new technologies to ensure its transmission system is the most reliable possible.

Western's Attachment P is divided into Part I and Part II – Part I outlines the transmission planning process Western uses in the Upper Great Plains Region (UGPR) on both the Eastern and Western Interconnections, while Part II outlines the process used in the remaining Western regions in the Western Interconnection.

Western's transmission planning process is based on three core objectives:

- Maintain reliable electric service.
- Improve the efficiency of electric system operations, including the provision of open and non-discriminatory access to its transmission facilities.
- Identify and promote new investments in transmission infrastructure in a coordinated, open, transparent and participatory manner.

Western's transmission planning process is intended to facilitate a timely, coordinated and transparent process that fosters the development of electric infrastructure that maintains reliability and meets Network load growth, so that Western can continue to provide reliable low cost electric power to its customers.

The transmission planning process conducted by Western includes a series of open planning meetings that allow anyone, including, but not limited to, network and point-to-point transmission customers, interconnected neighbors, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, and other stakeholders, input into and participation in all stages of development of Western's transmission plan.

PART I - Upper Great Plains Region

Part I of this Attachment P addresses the rights and obligations of Transmission Customers, Affected Generators, other relevant stakeholders, and the Western Upper Great Plains Region (Transmission Provider) related to Transmission Planning within the UGPR. Specifically, Part I of Attachment P addresses: (a) the Mid-Continent Area Power Pool ("MAPP") regional planning process adopted by the Regional Transmission Committee ("RTC") Members of MAPP in the RTC Region, as those terms are defined by the MAPP Restated Agreement (Sections 1.0 to 12.0); (b) the Transmission Provider's local planning process for local facilities not covered by the respective regional planning processes (Section 13.0); and (c) the Western Electricity Coordinating Council (WECC) regional planning in relation to Western's UGPR facilities within the Western Interconnection (Section 14.0). Supporting documents related to Transmission Planning within the UGPR, Part I of this Attachment P are available on the Transmission Provider's (Western's UGPR) OASIS page located at http://www.oasis.oati.com/wapa/index.html under the Transmission Planning Process folder. Within this folder, Western's UGPR posts an Attachment P links document that provides URLs for both Part I a , the Regional Planning Process within MAPP, Part I B, the Local Planning

Process, and Part I c, the Regional Planning Process with WECC for Western's UGPR as noted above.

1.0 Introduction to the MAPP Sub-regional Planning Process

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 interested parties 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. The Host TO shall conduct all related project management activities associated with the Economic Network Upgrade. 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 Generator. A generator owner whose existing or proposed generating unit(s) is directly affected by a proposed Economic Network Upgrade as demonstrated in the study analysis performed in conjunction with Section 11, Economic Planning Studies of this Attachment P.

2.3 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 accordance with Section 11 of this Attachment P.

2.4 Affected System Operator. The transmission owner/operator that operates an Affected System.

2.5 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: (a) a local economically beneficial project within a single transmission owner's system; or (b) an economically beneficial project classified as a Regionally Beneficial Project in the MAPP Plan, and defined by an Economic Planning Study authorized by the MAPP RTC in Section 11 of this Attachment P as having project benefits exceeding project costs.

2.6 Physical Transmission Rights. Rights held by a party to a Facilities Agreement to schedule transmission service across a defined portion of a NERC flowgate or other transmission facility and/or to collect revenue credits, if applicable, against transmission service charges. Physical Transmission Rights will exist for the life of the facility if the holder is an owner, or for the term stated in the Facilities Agreement. The facility's capabilities that are to be allocated as Physical Transmission Rights, shall be consistent with the owner's or joint-owners' methodologies for determining facility ratings, system operating limits and, if applicable, TTC and ATC in accordance with NERC standards.

2.7 Renewable Energy Zone. A geographic region recognized by the TPSC that has limited or constrained ability to transport electric energy from generating units that had such units been in production they would have utilized renewable resources for the production of electric energy.

2.8 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.

2.9 Other Defined Terms. All other terms will have the meanings set forth in the MAPP 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 transmission facilities under MAPP's Restated Agreement 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 P. 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 interested party communicated to the RTC Member under procedures, standards and requirements established by the RTC;

(f) 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

(g) the obligation of the RTC Member under FERC requirements, the MAPP 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 in accordance with the MAPP Critical Energy Infrastructure Information ("CEII") policy and the Commission's Standards of Conduct regulations.

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

(a) The communication to an RTC Member by Members and interested parties 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 or other interested party, 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. No 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 interested parties 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 definitive commitment of resources has been made *e.g.*, projects under the Subscription Rights process or under a Facilities Agreement.

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 party may attend any meeting of the RTC or any of its subcommittees dealing with the MAPP Regional Plan.

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 utilizing Subregional Planning Groups 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 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 alternatives 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 MAPP Restated Agreement, are responsible for designing, constructing and placing into service the various transmission projects comprising the MAPP Regional Plan, after satisfying applicable regulatory requirements.

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 SPGs 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 P 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) Ongoing studies of the SPG Member and Working Group.

(b) Subregional Plan Addendum report submitted to TPSC.

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

(a) Analyze history of constrained interface performance.

(b) Analyze history of transmission loading relief requests.

(c) Review of reliability assessment studies and reports.

4.2.3 TPSC Model Preparation:

(a) Select base case models from appropriate MRO Model Series.

(b) Add Member and SPG plans to models.

(c) Solicit input from stakeholders including additions or changes to transmission, generation, and demand resources, in developing base-line assumptions and models.

(d) Validate firm transactions, major new loads, transmission and new generation.

4.2.4 TPSC Study Procedures:

(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) Utilize an appropriate combination of technical analysis and engineering judgment to determine preferred solutions when competing solution options proposed to meet system needs are received from a SPG. Technical analysis may include, but is not 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. Engineering judgment may include such factors as the extent to which proposed alternative solutions meet applicable planning criteria and other regulatory requirements, expected levels of public acceptance and projected environmental impacts.

(d) Perform 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.

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;

(d) identify to the TPSC the proposed solution alternatives included in individual Member Plans or proposed by stakeholders in instances where there is no SPG consensus on a preferred alternative; and

(e) submit subregional 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;

(c) utilize an appropriate combination of technical analysis and engineering judgment to determine preferred solutions when competing solution options proposed to meet system needs are received from a SPG. Technical analysis may include, but is not 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. Engineering judgment may include such factors as the extent to which proposed alternative solutions meet applicable planning criteria and other regulatory requirements, expected levels of public acceptance and projected environmental impacts; and

(d) 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 interested parties:

(a) Interested parties 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 interested parties should contact any member of the TPSC.

(b) The Member is required to take both the Member Plans and interested parties' 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 interested parties' needs.

(d) The SPG 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

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. The TPSC shall utilize the following procedures in developing the MAPP Regional Plan. Costs incurred related to regional planning activities shall be recovered under the provisions of the MAPP Restated Agreement and related RTC policies.

5.1.2 TPSC Representatives. The TPSC shall be constituted as defined by the MAPP Restated Agreement. In accordance with the MAPP Restated Agreement, such Representatives shall be elected by the RTC, and the RTC sets the size, duties and responsibilities of the TPSC. The TPSC Representatives shall elect the TPSC Chair and Vice-Chair.

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 MAPP e-mail distribution lists, and subsequently posted at 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 fifteen (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 and sent via the TPSC e-mail distribution list at least ten (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 ten (10) days prior to the meeting. The supporting information shall be posted on the www.mapp.org after communicating it via the e-mail distribution list, unless the information has been deemed 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 subject to signing a MAPP non-disclosure agreement.

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 ten (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.

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 TPSC shall:

(a) develop and recommend for approval by the RTC the biennial MAPP Regional Plan required by the MAPP 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 interested parties 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 MAPP 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, subject to RTC approval, 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 RTC, the MRO and Adjacent Systems 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,

(m) oversee the duties and responsibilities of Working Groups; and

(n) utilize an appropriate combination of technical analysis and engineering judgment to determine preferred solutions when competing solution options proposed to meet system needs are received from a SPG.

5.3 Transmission Customer Responsibilities. Transmission Customers in the RTC region shall provide annually to the Transmission Provider the following types of information:

(a) Generators: All planned additions or upgrades (including status and expected in-service date), planned retirements, and environmental restrictions.

(b) Demand Response Resources: Existing and planned demand resources and their impacts on demand and peak demand.

(c) Network Customers: Forecast information for load and resource requirements over the planning horizon and identification of demand response reductions.

(d) Point-to-Point Transmission Customers: Projections of need for service over the planning horizon, including transmission capacity, duration, and receipt and delivery points.

(e) Transmission Customers should provide the Transmission Provider with timely written notice of material changes in any information previously provided relating to its load, its resources, or other aspects of its facilities or operations affecting the transmission provider's ability to provide service.

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 party and any actual or potential user of the relevant transmission facilities. Participation in any SPG meeting is open to any interested party who has signed the MAPP Non-Disclosure Agreement (NDA). A MAPP NDA is obtained by contacting the Secretary of the MAPP TPSC. 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 115 kV or greater;

(b) review and comment on proposed Member Plans for additions and modifications to the subregional transmission system;

(c) incorporate proposed Member load-serving plans to the subregional transmission system into the SPG Biennial Plan;

(d) incorporate Member Plans for new generator connections and associated network upgrades into the SPG Biennial Plan as soon as practicable;

(e) coordinate the Subregional Plans of the SPG with the Subregional Plans of neighboring SPGs;

(f) update the SPG Biennial Plan as deemed necessary by the SPG or the TPSC;

(g) form technical study task forces as required to carry out the subregional planning responsibilities;

(h) 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;

(i) encourage participation by stakeholders so that the SPG can consider and incorporate the future transmission needs of the stakeholder into the Subregional Plan;

(j) ensure SPG studies meet NERC/MRO Planning Standards and requirements; and

(k) promote stakeholder and Regulatory Participant review and comment on the Subregional Plan and its development.

6.5 Submission of Member Plans to SPG. Each Transmitting Utility Member, as that term is defined in the MAPP 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 Network Upgrades Out of Planning Cycle. When planned transmission upgrades are identified by a Member outside the timing requirements of the Regional Plan (including any network upgrades needed for generation interconnection or transmission service):

- The Member will submit information about the upgrades at the next SPG meeting and the next TPSC meeting to make every reasonable effort to allow for stakeholder input on such upgrades before those upgrades go in-service.

- The Member will include those upgrades in their next Member Plan.

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. Participation in any SPG meeting is open to any interested party who has signed the MAPP NDA. Meeting notices are posted on the MAPP calendar at www.mapp.org. 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, the SPG Chair, or SPG Secretary to the SPG Membership via the SPG and TPSC exploder email list. Other stakeholders, such as interested parties, that request meeting notification shall also be sent a meeting notice. In addition, the meetings are posted on the MAPP website under the calendar of MAPP meetings. 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 subregional Regulatory Participants, who are not SPG Members or may not be subscribed to the SPG and TPSC 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 115 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;

(e) recommend the preferred alternatives which best address the subregional requirements to the TPSC;

(f) forward alternative proposed solutions to the TPSC for the evaluation and determination of preferred plan options for inclusion in the MAPP Regional Plan in the absence of consensus agreement by a SPG on the selection of preferred plan options;

(g) address subregional deficiencies identified in the MAPP Regional Plan; and

(h) 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.

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. 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 shall solicit input from stakeholders including additions or changes to transmission, generation, and demand resources, in developing base-line assumptions and models used in developing the SPG Plan. 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 description of alternative plan options in the absence of consensus SPG agreement on preferred solutions;

(f) a brief description of the SPG studies, including costs, supporting the recommendations, with reference to the detailed SPG study report;

(g) a description of the new facilities; and

(h) a description of the Public Input/Review Process.

7.0 Public Input Process

7.1 Stakeholder Participation. The TPSC shall invite Members, interested parties, any actual or potential users of the relevant transmission facilities, and neighboring transmission owning utilities (referred to collectively as "stakeholders"), as well as Regulatory Participants, to be part of the planning process. The SPG shall invite such stakeholders to SPG meetings as part of the public input process into the Subregional Plan. The SPG shall:

(a) identify and maintain a list of stakeholders involved in the review and comment on additions to the Transmission System in their subregion;

(b) add stakeholders to the appropriate SPG email exploder lists following their requests to MAPPCOR planning staff to participate;

(c) verify that stakeholders have signed the MAPP NDA for attendance at the meetings where CEII material is discussed;

(d) identify comparable contacts from interconnected NERC regions;

(e) coordinate with stakeholders as to the process required, areas of needs, and possible solutions;

(f) review the solutions with stakeholders to identify the best options from a transmission and regulatory basis for that subregion to include in the Subregional Plan; and

(g) report to the TPSC and include in the Subregional Plan documentation of the public process completed for the Subregional Plan such as dates of meetings, number of stakeholders, highlights of key comments and SPG consideration of those comments. The SPG shall include in their Subregional Plan report to the TPSC a listing of the suggestions for economic planning studies that they received from their stakeholders during the year.

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 regulatory participation, shall:

(a) Maintain a list of Regulatory 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.

(c) Coordinate with the Regulatory Participants as to the process required, areas of needs, and possible solutions. Review the solutions with such 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 TPSC, as part of the formal process for the regulatory participation, shall:

(a) maintain a list of Regulatory Participants involved in the review and approval of additions to the Transmission System for each SPG;

(b) report in the MAPP Regional Plan the input of the Regulatory Participants obtained in developing the MAPP Regional Plan;

(c) present the results of the MAPP Regional Plan and the needed facilities to the 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) make the MAPP Regional Plan 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 Inter-regional Planning Coordination

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

The TPSC will select a TPSC member who will be responsible for reporting on the relevant activities of the MAPP RTC, MRO and RTO subcommittees at each TPSC meeting. The TPSC liaison may attend the MAPP RTC, MRO and neighboring RTO subcommittee meetings or employ other effective means to obtain the required information.

8.1 Coordination Principles. The MAPP Regional Plan shall be developed in accordance with the principles of interregional coordination through collaboration with representatives from neighboring regions, or their applicable sub-regions,

including adjacent transmission providers or regional transmission organizations, or their designated regional planning organization(s).

8.2 Joint Planning Committee. MAPP shall participate in a Joint Planning Committee ("JPC") with representatives of adjacent transmission providers or regional transmission organizations, or their designated regional planning organizations(s) ("Regional Planning Coordination Entities" or "RPCEs"). The JPC shall be comprised of representatives of MAPP and the RPCE(s) in numbers and functions to be identified from time to time. The JPC may combine with or participate in similarly established joint planning committees amongst multiple RPCEs or established under joint agreements to which MAPP is a signatory, for the purpose of providing for broader and more effective inter-regional planning coordination. The JPC shall have a Chairman. The Chairman shall be responsible for: the scheduling of meetings; the preparation of agendas for meetings; the production of minutes of meetings; and for chairing JPC meetings. The Chairmanship shall rotate amongst MAPP and the RPCEs on a mutually agreed to schedule, with each party responsible for the Chairmanship for no more than one planning study cycle in succession. The JPC shall coordinate planning of the systems of the Western Area Power Administration's Upper Great Plains Customer Service Region and the RPCEs, including the following:

8.2.1 Coordinate the development of common power system analysis models to perform coordinated system planning studies including power flow analyses and stability analyses. For studies of interconnections in close electrical proximity at the boundaries among the systems of MAPP and the RPCEs, the JPC or its designated working group will coordinate the performance of a detailed review of the appropriateness of applicable power system models.

8.2.2 Conduct, on a regular basis, a Coordinated Regional Transmission Planning Study ("CRTPS"), which shall be reviewed by stakeholders, as set forth in Section 8.4.1.

8.2.3 Coordinate planning activities under this section 8, including the exchange of data and developing necessary report and study protocols.

8.2.4 Maintain an Internet site and e-mail or other electronic lists for the communication of information related to the coordinated planning process. Such sites and lists may be integrated with those existing for the purpose of communicating the open and transparent planning processes of MAPP.

8.2.5 Meet at least semi-annually to review and coordinate transmission planning activities.

8.2.6 Establish working groups as necessary to address specific issues, such as the review and development of the regional plans of the RPCE and MAPP, and localized seams issues.

8.2.7 Establish a schedule for the rotation of responsibility for data management, coordination of analysis activities, report preparation, and other activities.

8.3 Data and Information Exchange. MAPP shall make available to each RPCE the following planning data and information. Unless otherwise indicated, such data and information shall be provided annually. MAPP shall provide such data in accordance with the applicable CEII policy, and maintain data and information received from each RPCE in accordance with their applicable confidentiality policies.

8.3.1 Data required for the development of power flow cases, and stability cases, incorporating up to a ten year load forecasts as may be requested, including all critical assumptions that are used in the development of these cases.

8.3.2 Fully detailed planning models (up to the next ten (10) years as requested) on an annual basis and updates as necessary to perform coordinated studies that reflect system enhancement changes or other changes.

8.3.3 The regional plan documents, any long-term or short-term reliability assessment documents, and any operating assessment reports produced by MAPP and the RPCE.

8.3.4 The status of expansion studies, system impact studies and generation interconnection studies, such that MAPP and the RPCE have knowledge that a commitment has been made to a system enhancement as a result of any such studies.

8.3.5 Transmission system maps for MAPP and the RPCE bulk transmission systems and lower voltage transmission system maps that are relevant to the coordination of planning between or among the systems.

8.3.6 Contingency lists for use in load flow and stability analyses, including lists of all contingency events required by applicable NERC or Regional Entity planning standards, as well as breaker diagrams, as readily available, for the portions of the MAPP and the RPCE transmission systems that are relevant to the coordination of planning between or among the systems. Breaker diagrams to be provided on an as requested basis.

8.3.7 The timing of each planned enhancement, including estimated completion dates, and indications of the likelihood that a system enhancement will be

completed and whether the system enhancement should be included in system expansion studies, system impact studies and generation interconnection studies, and as requested the status of related applications for regulatory approval. This information shall be provided at the completion of each planning cycle of MAPP, and more frequently as necessary to indicate changes in status that may be important to the RPCE system.

8.3.8 Quarterly identification of interconnection requests that have been received and any long-term firm transmission services that have been approved, that may impact the operation of MAPP or the RPCE system.

8.3.9 Quarterly, the status of all interconnection requests that have been identified.

8.3.10 Information regarding long-term firm transmission services on all interfaces relevant to the coordination of planning between or among the systems.

8.3.11 Load flow data initially will be exchanged in PSS/E format. To the extent practical, the maintenance and exchange of power system modeling data will be implemented through databases. When feasible, transmission maps and breaker diagrams will be provided in an electronic format agreed upon by the Transmission Provider and the RPCE. Formats for the exchange of other data will be agreed upon by MAPP and the RPCE.

8.4 Coordinated System Planning. MAPP shall agree to coordinate with the RPCEs studies required to assure the reliable, efficient, and effective operation of the transmission system. Results of such coordinated studies will be included in the Coordinated System Plan. MAPP shall agree to conduct with the RPCEs such coordinated planning as set forth below.

8.4.1 Stakeholder Review Processes. MAPP, in coordination with coordinating RPCEs shall review the scope, key modeling assumptions, and preliminary and final results of the CRTPS with impacted stakeholders, and shall modify the study scope as deemed appropriate by MAPP in agreement with the coordinating RPCEs, after receiving stakeholder input. Such reviews will utilize the existing planning stakeholder forums of the coordinating parties including as applicable joint Sub Regional Planning Meetings.

8.4.2 Single Entity Planning. MAPP shall engage in such transmission planning activities, including expansion plans, system impact studies, and generator interconnection studies, as necessary to fulfill its obligations under the MAPP Restated Agreement and any other MAPP transmission planning

procedures. Such planning shall conform to applicable reliability requirements of NERC, applicable regional reliability councils, and any successor organizations thereto. Such planning shall also conform to any and all applicable requirements of Federal or State regulatory authorities. MAPP will prepare a regional transmission planning report that documents the procedures, methodologies, and business rules utilized in preparing and completing the report. MAPP shall agree to share the transmission planning reports and assessments with each RPCE, as well as any information that arises in the performance of its individual planning activities as is necessary or appropriate for effective coordination among MAPP and the RPCEs on an ongoing basis. MAPP shall provide such information to the RPCEs in accordance with the applicable CEII policy and shall maintain such information received from the RPCEs in accordance with their applicable confidentiality policies.

8.4.3 Analysis of Interconnection Requests. In accordance with the procedures under which a MAPP Transmission Provider provides interconnection service, MAPP will agree to coordinate with each RPCE the conduct of any studies required in determining the impact of a request for generator or merchant transmission interconnection. Results of such coordinated studies will be included in the impacts reported to the interconnection customers as appropriate. Coordination of studies shall include the following:

8.4.3.1 When the Transmission Provider receives a request under its interconnection procedures for interconnection, it will determine whether the interconnection potentially impacts the system of a RPCE. In that event, the Transmission Provider will notify the RPCE and convey the information provided in the interconnection queue posting. The Transmission Provider will provide the study agreement to the interconnection customer in accordance with applicable procedures.

8.4.3.2 If the RPCE determines that it may be materially impacted by an interconnection on the Transmission Provider’s system, the RPCE may request participation in the applicable interconnection studies. The Transmission Provider will coordinate with the RPCE with respect to the nature of studies to be performed to test the impacts of the interconnection on the RPCE System, and who will perform the studies. The Transmission Provider will strive to minimize the costs associated with the coordinated study process undertaken by agreement with the RPCE.

8.4.3.3 Any coordinated studies associated with requests for interconnection to the Transmission Provider’s system will be

performed in accordance with the study timeline requirements and scope of the applicable generation interconnection procedures of Western.

8.4.3.4 The RPCE may participate in the coordinated study either by taking responsibility for performance of studies of its system, if deemed reasonable by the Transmission Provider, or by providing input to the studies to be performed by the Transmission Provider. The study cost estimates indicated in the study agreement between Transmission Provider and the interconnection customer, will reflect the costs, and the associated roles of the study participants including the RPCE. The Transmission Provider will review the cost estimates and scope submitted by all participants for reasonableness, based on expected levels of participation, and responsibilities in the study. If the RPCE agrees to perform any aspects of the study, the RPCE must comply with the timelines and schedule of Western's interconnection procedures.

8.4.3.5 The Transmission Provider will collect from the interconnection customer the costs incurred by the RPCE associated with the performance of such studies and forward collected amounts, no later than thirty (30) days after receipt thereof, to the RPCE. Upon the reasonable request of the RPCE, the Transmission Provider will make its books and records available to the requestor pertaining to such requests for collection and receipt of collected amounts.

8.4.3.6 The Transmission Provider will report the combined list of any transmission infrastructure improvements on either the RPCE and/or the Transmission Provider's system required as a result of the proposed interconnection.

8.4.3.7 Construction and cost responsibility associated with any transmission infrastructure improvements required as a result of the proposed interconnection shall be accomplished under the terms of Western's tariff under which the transmission service is provided, consistent with applicable Federal or State regulatory policy and applicable law.

8.4.3.8 Each transmission provider will maintain a separate interconnection queue. The JPC will maintain a composite listing of interconnection requests for all interconnection projects that have been identified as potentially impacting the systems of MAPP and coordinating RPCEs. The JPC will post this listing

on the Internet site maintained for the communication of information related to the coordinated system planning process.

8.4.4 Analysis of Long-Term Firm Transmission Service Requests. In accordance with applicable procedures under which the Transmission Provider provides long-term firm transmission service, Transmission Provider will coordinate the conduct of any studies required to determine the impact of a request for such service. Results of such coordinated studies will be included in the impacts reported to the transmission service customers as appropriate. Coordination of studies will include the following:

8.4.4.1 The Transmission Provider will coordinate the calculation of ATC values, if any, associated with the service, based on contingencies on their systems that may be impacted by the granting of the service.

8.4.4.2 When Transmission Provider receives a request for long-term firm transmission service, it will determine whether the request potentially impacts the system of the RPCE. If Transmission Provider determines that the RPCE system is potentially impacted, and that the RPCE would not receive a transmission service request to complete the service path, Transmission Provider will notify the RPCE and convey the information provided in the posting.

8.4.4.3 If the RPCE determines that its system may be materially impacted by granting the service, it may contact Transmission Provider and request participation in the applicable studies. The Transmission Provider will coordinate with the RPCE with respect to the nature of studies to be performed to test the impacts of the requested service on the RPCE system, and will strive to minimize the costs associated with the coordinated study process. The JPC will develop screening procedures to assist in the identification of service requests that may impact systems of the JPC members other than the Transmission Provider.

8.4.4.4 Any coordinated studies for request on Transmission Provider's system will be performed in accordance with the study timeline and scope requirements of the applicable transmission service procedures of the Transmission Provider.

8.4.4.5 The RPCE may participate in the coordinated study either by taking responsibility for performance of studies of its system, if deemed reasonable by the Transmission Provider or by providing

input to the studies to be performed by Transmission Provider. The study cost estimates indicated in the study agreement between Transmission Provider and the transmission service customer will reflect the costs and the associated roles of the study participants. Transmission Provider will review the cost estimates and scope submitted by all participants for reasonableness, based on expected levels of participation and responsibilities in the study.

8.4.4.6 Transmission Provider will collect from the transmission service customer, and forward to the RPCE, the costs incurred by the RPCE with the performance of such studies.

8.4.4.7 Transmission Provider will identify any transmission infrastructure improvements required as a result of the transmission service request.

8.4.4.8 Construction and cost responsibility associated with any transmission infrastructure improvements required as a result of the transmission service request shall be accomplished under the terms of Western's Open Access Transmission Tariff.

8.4.5 Coordinated Transmission Planning. MAPP agrees to participate in the conduct of a periodic Coordinated Regional Transmission Planning Study ("CRTPS"). The CRTPS shall have as input the results of ongoing analyses of requests for interconnection and ongoing analyses of requests for long-term firm transmission service. The Parties shall coordinate in the analyses of these ongoing service requests in accordance with sections 8.4.3 and 8.4.4. MAPP, in coordination with coordinating RPCEs, shall review the scope, preliminary results and final results of the CRTPS with impacted stakeholders, in accordance with section 8.4.1 and this section. The results of the CRTPS shall be an integral part of the expansion plans of each Party. Construction of upgrades on the Transmission System of the Transmission Provider identified as necessary in the CRTSP shall be under the terms of the applicable Western documentation applicable to the construction of upgrades identified in the expansion planning process. Coordination of studies required for the development of the Coordinated System Plan will include the following:

8.4.5.1 Every three years, MAPP shall participate in the performance of a CRTPS. Sensitivity analyses will be performed, as required, during the off years based on a review by the JPC of discrete reliability problems or operability issues that arise due to changing system conditions.

8.4.5.2 The CRTPS shall identify all reliability and expansion issues, and shall propose potential resolutions to be considered by MAPP and the coordinating RPCEs.

8.4.5.3 As a result of participation in the CRTPS, neither MAPP nor its members are obligated in any way to construct, finance, operate, or otherwise support any transmission infrastructure improvements or other transmission-related projects identified in the CRTPS. Any decision to proceed with any transmission infrastructure improvements or other transmission-related projects identified in the CRTPS shall be based on the applicable reliability, operational and economic planning criteria established for MAPP as applicable to the development of the MAPP Regional Plan and set forth in this Attachment P.

8.4.5.4 As a result of participation in the CRTPS, the RPCEs are not entitled to any rights to financial compensation due to the impact of the transmission plans of MAPP upon the RPCE system, including but not limited to its decisions whether or not to construct any transmission infrastructure improvements or other transmission-related projects identified in the CRTPS.

8.4.5.5 The JPC will develop the scope and procedure for the CRTPS. The scope of the CRTPSs performed over time will include evaluations of the transmission systems against reliability criteria, operational performance criteria, and economic performance criteria applicable to MAPP and the RPCEs.

8.4.5.6 In the conduct of the CRTPS, MAPP and the coordinating RPCEs will use planning models that are developed in accordance with the procedures to be established by the JPC. Exchange of power flow models will be in a format that is acceptable to the coordinating parties.

9.0 Member Plans

The procedures, standards and requirements for making available Members' transmission plans ("Member Plans") and the information on which the Member Plans are based, as required by the MAPP 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. The Member Plans will be integrated into the SPG Subregional Plan.

The Subregional Plan reports, and subsequent updates, are submitted to the TPSC as part of the MAPP Regional Plan. Additionally, the MAPP Regional Plan will provide an executive

summary report of the Member and SPG plans showing the anticipated transmission expansions in the region. Detailed Member planning reports are referenced in the Subregional Plan. Such reports typically provide details of economic evaluations, extensive alternative evaluations and supporting technical studies and minority opinions if consensus is not reached.

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 inter-regional 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 RTC 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 transmission, generation or demand 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 P. 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; or (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 subregional 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). BRPs are Network Upgrades identified in the base case as required to ensure that the Transmission System is in compliance with applicable NERC and MRO Reliability Standards.

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 Western's Tariff. New Transmission Access Projects include projects that are needed to accommodate 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 Western'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 Western's Tariff for Network Service or a new designation of a Network Resource(s).

12.1.3 Regionally Beneficial Projects (RBP). A RBP is a transmission network upgrade that shall be: (a) proposed in accordance with the MAPP Planning Process; (b) found to be eligible for inclusion in the MAPP Regional Plan; (c) determined not to be a New Transmission Access Project; and (d) found to have regional benefits. RBPs may include projects that expand the scope of a project that would otherwise qualify as a Baseline Reliability Project.

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 BRP 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 facility addition shall be recovered through Western's rate recovery method. Costs associated with BRP involving multiple transmission owners shall be shared among the affected transmission owners in accordance with this principle, subject to those transmission owners' respective interconnection agreements.

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 Western's Tariff shall be used for new Transmission Access Projects.

12.2.3 Allocation Rules for RBPs. The MAPP Regional Plan shall classify transmission projects as described above. Any economic planning study authorized by the MAPP RTC for a RBP and performed in compliance with Section 11 of this Attachment P, 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 ("Auction 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 serve as the Host TO, provided that the MAPP RTC identifies another qualified transmission owner, including a consortium of transmission owners and/or independent transmission owners, 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 Auction Procedure is applicable to MAPP-Region transmission owners and Eligible Transmission Customers, including but not limited to Affected Generators and MAPP-Region Load-Serving Entities ("LSEs"), collectively referred to as "Eligible Participants."

12.2.3.2 First Call Offer of Subscription Rights. The Contractor (*i.e.*, MAPPCOR acting on behalf of the Host TO) shall submit an offer to participate in the Economic Network Upgrade to all Eligible Participants 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 P, in exchange for Subscription Rights to the new transmission capacity.

The Contractor shall offer, on OASIS on a non-discriminatory, basis to all Eligible Participants the opportunity to participate in the Economic Network Upgrade by purchasing a portion of the Subscription Rights made available by such Auction Procedure. If an Eligible Participant accepts the subscription offer for participation in the Economic Network Upgrade, the subscription shall be granted to such Eligible Participant as a Subscription Rights buyer. If demand for the Subscription Rights offered exceeds the number of Subscription Rights available, the Contractor shall offer such Subscription Rights to the interested Eligible Participants on a pro rata basis, based on each Eligible Participant's designated level of transmission capacity megawatts requested in its submitted offer to participate to the total transmission capacity megawatts requested. Each participating interested Eligible Participant shall have 60 days to accept such an offer for pro rata Subscription Rights.

12.2.3.3 Second Round Offer of Subscription Rights. Within 30 days following the close of the above first call offer of Subscription

Rights, the Contractor shall release any Subscription Rights that remain unsubscribed to all Eligible Participants. The Contractor shall allow thirty (30) days for recipients of the second round offer to indicate interest in acquiring the residual Subscription Rights. If the Subscription Rights offered are acquired by an Affected System Operator's transmission business unit, 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 open access transmission tariff ("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 revenue requirements to the Affected System Operator's OATT embedded cost rates, provided that any such Affected System Operator subject to the jurisdiction of the Commission shall obtain approval of the Commission prior to causing such rate adjustment to be effective. Furthermore, any subscribing Eligible Participant may roll the revenue requirements associated with the acquired Subscription Rights into the Affected System Operator's rate structure, as approved by the Commission, if the subscribing Eligible Participant makes the acquired transmission capacity available under the Affected System Operator's OATT.

12.2.3.4 Resale and Reassignment of Subscription Rights. The MAPP transmission provider 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.

12.2.3.5 Failure to Obtain Subscriptions. If, after the first and second rounds of the Auction Procedure have concluded, Subscription Rights sufficient to cover the total cost of the Economic Network Upgrade project have not been successfully subscribed, the Contractor shall notify subscribing Eligible Participants of the Subscription Rights shortfall. Such notice shall be in writing, include the amount of available Subscription Rights and provide thirty (30) days for such subscribing Eligible Participant to increase its Subscription Rights election. At the end of the expiration of the thirty (30) day notice period, the proposed project may be cancelled if it is still not fully subscribed. The Host TO or another Affected System Operator may choose to fund the remaining portion of the necessary subscription rights and roll those costs into their transmission revenue requirements. If a project is cancelled

under such circumstances, the Contractor shall notify all of the subscribers in writing within thirty (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.

12.2.3.6 Facilities Agreement. If the Economic Network Upgrade is fully subscribed, the Host TO shall offer the subscribers a Facilities Agreement within sixty (60) days of full subscription.

12.2.3.7 Defaulting Subscribers. If any of the subscribers fail to execute the Facilities Agreement within thirty (30) days of receipt of such agreement, the Contractor shall use its best efforts to award the non-signing subscriber's Subscription Rights to all Eligible Participants. If the Contractor 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, except to notify all of the subscribers in writing within thirty (30) days of its decision to terminate.

12.2.3.8 Post-Auction Host Owner Option. In the event the defined Economic Network Upgrade is not fully subscribed after the Auction Procedure described in Sections 12.2.3.2-12.2.3.7 is exhausted, the Host TO may, of its own accord, elect to perform such Economic Network Upgrade, and roll the upgrade costs into the next update of its transmission revenue requirements.

12.2.3.9 Conversion of Subscription Rights to Physical Transmission Rights. The Facilities Agreement associated with an Economic Network Upgrade shall convert the Subscription Rights allocated pursuant to Sections 12.2.3.2, 12.2.3.3, 12.2.3.5 and 12.2.3.7 above, to Physical Transmission Rights. Subscription Rights and Physical Rights shall be the same transmission capability rights with the principal distinction merely being the stage of project commitment. Subscription Rights shall be associated with a good faith expression of intent, albeit still based on non-binding estimated planning costs, to invest in the Economic Network Upgrade. Upon signing a Facilities Agreement, the Eligible Participant's expression of intent to invest as a holder of Subscription Rights becomes a binding contractual commitment with the prescribed Physical Rights to the discrete transmission capability defined in the Facilities Agreement. The additional transmission capability achieved by the project shall be allocated to the Subscription Rights holders as Physical Transmission Rights in proportion to their respective payment for the network upgrade. The Physical Transmission Rights do not in themselves convey a form of transmission service under Part II or Part III of the Tariff. The holder of the Physical Transmission Rights may use those rights in conjunction with a specific application of transmission service under Part II or Part III of the Tariff of the Host TO, or the holder may sell or assign the Physical Transmission Rights to another party. Physical Transmission Rights may be used by a generator owner to secure firm transmission service and/or provide a hedge against potential congestion charges.

12.2.3.10 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).

12.2.3.11 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 P.

12.2.3.12 Transmission Projects for Renewable Energy Zones. The Subscription Rights procedures of Sections 12.2.3.3 through 12.2.3.7 above may also be applied to a regional transmission project that is designed to develop deliverability from Renewable Energy Zones to a market in the same manner that the Subscription Rights procedures are applied for Economic Network Upgrades. However, this procedure shall not be an alternative for requirements of Transmission Access Projects under Parts II and III of the Tariff, or for the obligations of Attachment I, "Standard Large Generator Interconnection Procedures (LGIP)". The Renewable Energy Zone transmission project must be included in the MAPP Regional Plan or in the transmission plan of an adjacent region that has been coordinated with the MAPP Regional Plan.

12.3 Existing Cost Allocation Methodologies. The cost allocation methodology set forth in this Section 12.0 shall not modify or be inconsistent with (a) existing mechanisms to allocate costs for projects that are constructed by a single transmission owner and billed under existing rate structure, or (b) existing cost allocation methods applicable to specific requests for interconnection or transmission service under the pro forma OATT. Further, the cost allocation methodology set forth in this Section 12.0 shall not supersede cost-allocation, cost-sharing or joint-investment obligations to which an individual Host TO or Affected System may be subject.

13.0 Western's Upper Great Plains Region Local Planning Process

Western's UGPR Local Transmission Planning Process covers transmission facilities under Western's Tariff contained within both the Eastern and Western Interconnection of Western's Upper Great Plains Region. The Local Transmission Plan (LTP) is the transmission plan of the Transmission Provider that identifies the upgrades and other investments to the Western UGPR Transmission System necessary to reliably satisfy, over the planning horizon, Network Customers' resource and load growth expectations for Native Load Customers; Transmission Provider's obligations pursuant to grandfathered, non-OATT agreements; and Transmission Provider's Point-to-Point Transmission Service customers' projected service needs including obligations for rollover rights. In addition to this local process, Western UGPR participates in the regional planning efforts as described in Part I of this Attachment P and utilizes these forums also to coordinate new projects with Transmission Customers, Affected Generators, or other relevant stakeholders.

13.1 Scope. The purpose of Western's UGPR Local Transmission Planning Process is to conduct local long-term planning for transmission facilities typically on a two year planning cycle with annual assessments to serve Western's network load and firm transmission commitments. The preparation of the LTP shall be done in accordance with the general policies, procedures, and principles set forth in this Attachment P.

13.1.1 Service Requests. Point-to-Point transmission service request must be made as a separate and distinct submission by an Eligible Customer in accordance with the procedures set forth in Transmission Provider's Tariff. Similarly, Network Customers must submit Network Resource and load additions/removals pursuant to the process set forth in Transmission Provider's Tariff.

13.1.2 Comparability between Customers. The process provides comparable long-term transmission system planning for similarly-situated wholesale customers. The process provides long-term reliability and economic planning of transmission facilities for Western's UGPR firm commitments (e.g., point-to-point service with rollover rights) and Network Customers served from the UGPR Transmission System that is comparable to the long-term planning of its own Native Load Customers from the UGPR System. In developing the LTP, Transmission Provider shall apply applicable reliability criteria, including criteria established by the Transmission Provider, the Midwest Reliability Organization, the WECC, the North American Electric Reliability Corporation, and the Federal Energy Regulatory Commission.

13.1.3 Comparability between Resources. Comparability between resources, including similarly situated customer-identified projects, will be accomplished by modeling from the generation to the Network Load on the UGPR Transmission System. Comparability between resources will be achieved in Western UGPR's LTP by including all valid data received from customers (including load forecast data, generation data and Demand Resource data) in the LTP development. Comparability will be achieved by allowing customer-defined projects sponsor participation throughout the transmission planning process and by considering customer-defined projects (transmission solutions and solutions utilizing Demand Resources load modeled as a load adjustment) in the LTP development. The Transmission Provider retains discretion as to which solutions to pursue and is not required to include all customer-identified projects in its plan.

13.2 Responsibilities. Western will be responsible for the development of the transmission plans that result from Western's UGPR Local Transmission Planning Process. Western's UGPR Local Planning Process will allow timely and meaningful stakeholder input and participation in the development of the LTP. Western's UGPR Local Planning Process will follow regional planning procedures provided in Sections 1 through 12 and Sections 14 of this Attachment P. The transmission plans and studies on the eastern interconnect resulting from Western's UGPR Local Planning Process that are to be included in MAPP Regional Plans will be submitted to the applicable MAPP Committees and on the Western Interconnection resulting from Western's UGPR Local Planning Process that are to be included in WECC Regional Plans will be submitted to the applicable WECC Committees, to their successor regional or sub-regional committees, and/or to the successor regional transmission organization, independent transmission coordinator, or independent system operator, as appropriate.

In addition to developing transmission plans to be provided for regional coordinated planning, Western's UGPR Local Planning Process will develop plans to address local UGPR transmission issues, such as transmission facility uprates that do not significantly change network system flows. The plans will be provided in reports with executive summaries that are brief and designed to be understandable to stakeholders.

13.3 Open Planning Process.

13.3.1 Openness: Western's UGPR Local Planning Process will be open to all stakeholders during the development of the LTP. All meetings related to the LTP process shall be: (1) noticed by the Transmission Provider via the OASIS; and (2) provide for alternate means of participation, to the extent practical and economical, such as teleconference, videoconference or other similar means. The mode, method, schedule, process, and instructions for participation in Western's UGPR Local Planning Process shall be posted and maintained on the OASIS.

13.3.2 Limitations on Disclosure: While Western's UGPR Local Planning Process will be conducted in the most open manner possible, Transmission Provider has an obligation to protect sensitive information such as, but not limited to, Critical Energy Information and the proprietary materials of third parties. Nothing in this Attachment P shall be construed as compelling the Transmission Provider to disclose materials in contravention of any applicable regulation, contractual arrangement, or lawful order unless otherwise ordered by a governmental agency of competent jurisdiction. Transmission Provider may employ mechanisms such as confidentiality agreements, protective orders, or waivers to

facilitate the exchange of sensitive information where appropriate and available.

13.3.3 Compliance: Transmission Provider will adhere to all applicable regulations in preparing the LTP, including but not limited to the Standards of Conduct for Transmission Providers and Critical Information Energy Information.

13.4 Study Process. A local study group process will be instituted in addition to the open planning process described in Section 13.3. The purpose of the local study group process is to expand stakeholder participation in Western's UGPR Local Planning Process as provided in the following:

(a) A working group will be formed at the first semi-annual stakeholder meeting to receive information and provide comment on planning issues that are the subject of Western's UGPR Local Planning Process that arise between stakeholder meetings. Western UGPR will provide (subject to confidentiality, CEII, cyber security and Standards of Conduct requirements):

1. The initial assumptions used in developing the annual local process transmission assessment and will provide an opportunity for feedback.

2. The models used for local process transmission planning.

3. Information regarding the status of local process transmission upgrades and how such upgrades are reflected in future local process transmission plan development.

4. The draft study scope for those studies conducted by the working group as part of the local process, which will include or provide references to the basic assumptions for the study, the model or models used in the working group study including information regarding significant changes in the model.

5. The draft transmission report for those studies conducted by the working group as part of the local process, as prepared by Western UGPR or Western UGPR's designate. Stakeholders who do not participate on the working group will be given the opportunity to comment on the draft report after Western UGPR has considered the comments of the working group. The report will include an executive summary that is brief and is designed to be understandable to stakeholders.

6. Draft transmission plans that result from Western's UGPR Local Planning Process before they are distributed to stakeholders pursuant to the open planning process described in Section 13.3 above.

(b) The working group meetings will be established by Western UGPR on an as needed basis. Working group meetings will also be established if need is expressed by 10 members of the respective working group; however, Western UGPR will not be required to hold meetings of the working group more than on a semi-annual basis. Meetings will typically be conference calls and/or web casts, but face-to-face meetings may be called if necessary. Meeting notices will be distributed via email to the respective study group mailing list. Meeting materials may be distributed via email respecting email size limitations and CEII, cyber security, and Standards of Conduct requirements. A password protected FTP site or internet may be used to transmit study models or large amounts of data.

(c) Western UGPR will chair and provide leadership to the working group, including facilitating the group meetings.

(d) Input from the working group members will be considered in the local planning process. Comments will generally be expected via email or during working group meetings. Comments will be solicited within the defined comment periods of the study group process.

13.5 Transparency. In addition, Western's UGPR Local Planning Process will be open and transparent to facilitate comment and exchange of information, as described below:

(a) Western UGPR will make available the basic criteria that underlie its transmission system plans by posting Western UGPR's Transmission Planning Criteria for facilities covered by this Attachment P on the Western UGPR OASIS page.

(b) Western UGPR will make available to registered stakeholders (subject to CEII, cyber security, and Standards of Conduct requirements) the basic criteria, assumptions, and data that underlie its transmission system plans. For this purpose, Western UGPR will make the following documents available in a way that maintains confidentiality and complies with CEII and cyber security requirements: i. Western's FERC Form 714, ii. Western's FERC Form 715.

(c) Western UGPR will provide information on the location of applicable NERC/MAPP/Midwest Reliability Organization ("MRO")/WECC planning criteria, reliability standards, regional power flow models, or other pertinent information, as available.

(d) Western UGPR will provide its regional planning model submittal in accordance with Section 13.6 of this Attachment P.

(e) Western UGPR will set the planning study horizons and study frequencies considering NERC and or regional entity standards and the MAPP SPG planning cycle and the WECC Regional Planning Process.

(f) Western UGPR will simultaneously disclose transmission planning information where appropriate in order to alleviate concerns regarding the disclosure of information with respect to the FERC Standards of Conduct.

(g) Western UGPR will consider customer demand response resources in Western's UGPR Local Planning Process on a comparable basis with generation resources in developing transmission plans provided that

1. such resources are capable of providing measurable transmission system support needed to correct transmission system problems assessed in the Western's UGPR Local Planning Process,

2. such resources can be relied upon on a long-term basis,

3. such resources meet NERC Reliability Standards and applicable laws, rules, and regulations, and

4. the inclusion of such resources in corrective action plans are permitted by the NERC Reliability Standards.

13.6 Information Exchange. Certain information exchanges associated with the open planning process and the local study group process are described in Sections 13.3 and 13.4 in this Attachment P. In addition, information exchange for base regional model development will take place as follows:

(a) Western participates in the annual development of the regional base case power flow and stability models currently for the PSSE computer application. These regional models provide the basis for studies of transmission service requests, generator interconnection requests, local planning studies and regional planning studies. To assist in the development of accurate base case regional models and thereby develop appropriate local transmission plans for the Western UGPR system, Western will request at a minimum the following data of its Transmission Customers:

1. Network Customers and other Load Serving Entities (LSE) within the Western UGPR Control Area will be requested annually to submit

existing loads and future loads for the horizon of the regional base case models (typically 10 years) for each of its load points. Information for firm loads will be separated from information for interruptible loads.

2. Network Customers and other LSEs within the Western UGPR Control Area will be requested annually to provide a list of all existing and proposed new demand response resources including behind the meter generation or load curtailment; the MW impact on peak load; the historical and expected future operating practice of the demand response resources such as the conditions under which the customer intends to initiate each resource, and whether each resource is available for use in providing measurable transmission system support to correct problems assessed in Western's UGPR Local Planning Process, as well as, other information required to consider such resources as provided in Section 13.5 (g). Network Customers and other LSEs will be requested to provide updates of this information when substantive changes occur.

3. Network Customers and other LSEs within the Western UGPR Control Area will be requested annually to provide a list of existing and proposed new generation resources and historical and expected future dispatch practices such as the load level at which the customer plans to start each generating unit and plant, and whether each generation resource is available for use in providing measurable transmission system support to correct problems assessed in Western's UGPR Local Planning Process, as well as, other information required to consider such resources as provided in Section 13.5 (g). Network Customers and other LSEs will be requested to provide updates of this information when substantive changes occur.

4. Registered point-to-point customers including Western UGPR's marketing and energy affiliates, as appropriate, will be requested annually to submit projections of their quantifiable transmission service needs over the planning horizon, including applicable receipt and delivery points and the transmission service reservations anticipated to be scheduled.

5. Network Customers and other LSEs within the Western UGPR Control Area will be requested annually to submit existing and expected future generation for the horizon of the regional base case models (typically 10 years).

6. Additional modeling data will be requested as necessary to conform to the requirements of the NERC MOD standards.

(b) The data submitted by Transmission Customers will be included to the extent appropriate in the base case model.

(c) The Western UGPR data request will be sent annually in coordination with the regional data request. Western UGRP will send a data request to its Transmission Customers typically prior to expected transmittal of the regional data request. Transmission Customers will be expected to respond to the Western UGPR data request in a timely fashion.

(d) Responses to the data request will be accepted in forms such as PSS™E raw data format or in spreadsheet format with appropriately labeled headings.

(e) Each Transmission Customer and LSE within the Western UGPR control area will be responsible for providing Western with an email address of its data modeling contact. Western will send the annual data request to these contacts via email.

(f) The Western data response will be made available subject to CEII, cyber security and Standards of Conduct restrictions upon request to registered stakeholders.

13.7 Western's UGPR Local Economic Planning Studies. Local economic planning studies are performed to identify significant and recurring congestion on the transmission system and/or address the integration of new resources and loads. Such studies may analyze any, or all, of the following: (i) the location and magnitude of the congestion, (ii) possible remedies for the elimination of the congestion, in whole or in part, including transmission solutions, generation solutions and solutions utilizing demand response resources, (iii) the associated costs of congestion (iv) the costs associated with relieving congestion through system enhancements (or other means), and, as appropriate, (v) the economic impacts of integrating new resources and loads. All local economic planning studies will be performed through Western UGPR's participation in the regional economic planning studies as described in this Attachment P.

(a) Any Transmission Customers, Affected Generators, or other relevant stakeholders ("Requester") may submit a study request for an economic planning study directly to Western, the MAPP TPSC, or the WECC TEPPC. All requests must be electronically submitted to Western's Regional Office Contact e-mail Address as posted on the Transmission Providers OASIS. Western will not perform local economic planning studies but will coordinate the performance of such studies with the MAPP

TPSC or the WECC TEPPC. The economic planning study cycle will be that of the MAPP TPSC or WECC TEPPC process as outlined in this Attachment P.

(b) Western shall ensure that any economic planning study requests submitted to Western are properly handled by forwarding the Requestor to MAPP TPSC or WECC TEPPC for inclusion in the regional economic planning studies as outlined in this Attachment P.

(c) If the MAPP TPSC or WECC TEPPC determines, after reviewing through an open stakeholder process, that the requested economic planning study as forwarded by Western is not a high priority study, the Requester may perform the economic planning analysis at the Requester's expense. Western will support the Requester in ensuring that the study is coordinated as necessary through local, subregional or regional planning groups.

(d) Western cannot fund any high priority and other local economic planning studies due to its spending authorization being contingent upon Congressional Appropriations. In the event that Western is requested to perform a local economic planning study, Western will, at the Requester's expense, provide its assistance in having a third party perform the local economic planning study. Western will support the Requester in ensuring that the study is coordinated as necessary through local, subregional or regional planning groups.

14.0 Introduction to the WECC Regional Planning Process for Western's UGPR

Western UGPR will coordinate its Western Interconnection LTP through the WECC SPGs. The WECC SPGs will coordinate their subregional plans with the other subregional plans in the Western Interconnection and at the TEPPC level.

14.1 WECC Procedures for Regional Planning Project Review.

(a) WECC develops the Western Interconnection-wide coordinated base cases for transmission planning analysis such as power flow, stability and dynamic voltage stability studies. The WECC approved base cases are used for study purposes by transmission planners, subregional planning groups, and other entities that have signed confidentiality agreements with WECC.

(b) WECC also maintains a data base for reporting the status of all planned projects throughout the Western Interconnection.

(c) WECC provides for coordination of planned projects through its Procedures for Regional Planning Project Review.

(d) WECC's Path Rating Process ensures that a new project will have no adverse effect on existing projects or facilities.

14.2 WECC Open Stakeholder Meetings. Western Interconnection-wide economic planning studies are conducted by the WECC TEPPC in an open stakeholder process that holds region-wide stakeholder meetings on a regular basis. The WECC-TEPPC Transmission Planning Protocol, including the TEPPC procedures for prioritizing and completing regional economic studies, is posted on the WECC website. Western participates in the region-wide planning processes, as appropriate, to ensure that data and assumptions are coordinated.

14.3 Role of WECC TEPPC. WECC TEPPC provides two main functions in relation to Western's planning process:

(a) Development and maintenance of the west-wide economic planning study database. TEPPC uses publicly available data to compile a database that can be used by a number of economic congestion study tools. Also, TEPPC's database is publicly available for use in running economic congestion studies. For an interested transmission customer or stakeholder to utilize WECC's Pro-Mod planning model, it must comply with WECC confidentiality requirements.

(b) TEPPC has an annual study cycle described in the WECC-TEPPC Transmission Planning Protocol, during which it will update databases, develop and approve a study plan that includes studying transmission customer high priority economic study requests as determined by the open TEPPC stakeholder process, perform the approved studies and document the results in a report.

PART II – Western Interconnection of Western's Rocky Mountain, Desert Southwest and Sierra Nevada Regional Offices

Western coordinates its transmission planning with other transmission providers and stakeholders in the Rocky Mountain – located in Loveland, CO, Desert Southwest – located in Phoenix, AZ, and Sierra Nevada - located in Folsom, CA, Regional Offices, and the Western Interconnection as a whole, through its active participation in the Southwest Area Transmission Planning (SWAT) group, the Colorado Coordinated Planning Group (CCPG), the Sierra Subregional Planning Group (SSPG), membership in WestConnect[1], membership in the Western

[1] WestConnect was formed under a memorandum of understanding (MOU) that has been entered into by 13 transmission providing electric utilities in the Western Interconnection. The purposes of WestConnect are to investigate the feasibility of wholesale market enhancements, work cooperatively with other Western Interconnection organizations and market

Electricity Coordinating Council (WECC), and participation in the WECC Transmission Expansion Planning Policy Committee (TEPPC) and its Technical Advisory Subcommittee (TAS).

Three subregional planning groups (SPG) operate within the WestConnect footprint: SWAT, CCPG and SSPG. WestConnect's planning effort, which includes funding and provision of planning management, analysis, report writing and communication services, supports and manages the coordination of the subregional planning groups and their respective studies. Such responsibilities are detailed in the WestConnect Project Agreement for Subregional Transmission Planning (WestConnect STP Project Agreement), dated May 23, 2007 (see Western Attachment P Hyperlinks List at www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm). Western is a signatory to this Agreement.

The subregional planning groups within the WestConnect footprint, assisted by the WestConnect planning manager, coordinate with other Western Interconnection transmission providers and their subregional planning groups through TEPPC. TEPPC provides for the development and maintenance of an economic transmission study database for the entire Western Interconnection and performs annual congestion studies at the Western Interconnection region level.

1.0 Western Transmission Planning

1.1 Western Planning Process.

Participation in Western's planning process is open to all affected parties, including but not limited to all transmission and interconnection customers, state authorities, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, and other stakeholders.

1.1.1 Confidential or Proprietary Information

Western's transmission planning studies may include base case data that are WECC proprietary data or classified as Critical Energy Infrastructure Information (CEII) by the Federal Energy Regulatory Commission (FERC). A stakeholder must hold membership in or execute a confidentiality agreement with WECC (see Western Attachment P Hyperlinks List at www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm) in order to obtain requested base case data from Western. A stakeholder may obtain transmission planning information classified as

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stakeholders, and address seams issues in the appropriate forums. WestConnect has initiated an effort to facilitate and coordinate regional transmission planning across the WestConnect footprint. Current parties to the WestConnect MOU are: Arizona Public Service Company, El Paso Electric Company, Imperial Irrigation District, Nevada Power Company/Sierra Pacific Power Company, Public Service Company of Colorado, Public Service Company of New Mexico, Sacramento Municipal Utility District, Salt River Project, Southwest Transmission Cooperative, Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Tucson Electric Power Company, and Western Area Power Administration.

CEII from Western upon execution of a confidentiality agreement with Western.

1.1.2 Overview

Western's transmission planning process consists of an assessment of the following needs:

(a) Provide adequate transmission to serve Firm Electric Service (FES) customers.

(b) Where feasible, identify alternatives such as demand response resources that could meet or mitigate the need for transmission additions or upgrades.

(c) Access adequate resources in order to reliably and economically serve FES and network loads.

(d) Provide for interconnection for new generation resources.

(e) Coordinate new interconnections with other transmission systems.

(f) Accommodate requests for long-term transmission access.

1.1.3 Western's Transmission Planning Cycle

(a) Calendar Year Planning Cycle. Western conducts its transmission planning on a calendar year cycle for a ten year planning horizon.

(b) Annually Updated Ten Year Plan. Western updates its ten year plan annually and publishes an annual Ten Year Transmission Plan document typically in November.

1.1.4 Transmission Customer's Responsibility for Providing Data

(a) Use of Customer Data. Western uses information provided by its transmission customers to, among other things; assess network load and resource projections (including demand response resources), transmission needs, in-service dates to update regional models used to conduct planning studies.

(b) Submission of Data by Network Transmission Customers. Network transmission customers shall supply information on their ten year projected network load and network resources (including demand response resources) to Western on an annual basis.

Western requires that this information be submitted electronically to Western Regional Office Contact e-mail address (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm) by March 15 each year.

(c) Submission of Data by Other Transmission Customers. To maximize the effectiveness of the Western planning process, it is essential that all other transmission customers provide their ten year needs in the form of relevant data for inclusion in the Western transmission planning process. Western requires that this information be submitted electronically to Western Regional Office Contact e-mail address (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm) by March 15 each year. This will facilitate inclusion of transmission customer data in the planning process for the annual transmission plan.

(d) Transmission Customer Data to be Submitted. To the maximum extent practical and consistent with protection of proprietary information, data submitted by network transmission customers and other transmission customers should include for the ten year planning horizon:

i. Generators – planned additions or upgrades (including status and expected in-service dates) and planned retirements.

ii. Demand response resources – existing and planned demand resources and their impacts on peak demand.

iii. Network customers – forecast information for load and resource requirements over the planning horizon and identification of demand response reductions.

iv. Point-to-point transmission customers – projections of need for service over the planning horizon, including transmission capacity, duration, and receipt and delivery points.

(e) Notification of Material Changes to Transmission Customer Data. Each transmission customer is responsible for timely submittal of written notice to Western of material changes in any of the information previously provided related to the transmission customer's load, resources (including demand response resources), or other aspects of its facilities or operations which may, directly or indirectly, affect Western's ability to provide service.

1.1.5 Types of Planning Studies

(a) Economic Planning Studies. Economic planning studies are performed to identify significant and recurring congestion on the transmission system and/or address the integration of new resources and loads. Such studies may analyze any, or all, of the following: (i) the location and magnitude of the congestion, (ii) possible remedies for the elimination of the congestion, in whole or in part, including transmission solutions, generation solutions and solutions utilizing demand response resources, (iii) the associated costs of congestion (iv) the costs associated with relieving congestion through system enhancements (or other means), and, as appropriate, (v) the economic impacts of integrating new resources and loads. All economic planning studies will be performed either by a sub-regional planning group or TEPPC, and will utilize the TEPPC public data base.

(b) Reliability Studies. Western will conduct reliability planning studies to ensure that all transmission customers' requirements for planned loads and resources are met for each year of the ten year planning horizon, and that all NERC, WECC, and local reliability standards are met. These reliability planning studies will be coordinated with the other regional transmission planning organizations through the SWAT, CCPG, and SSPG studies.

1.1.6 Economic Planning Study Requests (*See* Flow Chart Attached as Exhibit 1)

Requesting Economic Planning Studies. Any Western transmission customer or other stakeholder, including transmission solutions, generation solutions and solutions utilizing demand response resources ("Requester") may submit a study request for an economic planning study directly to Western or TEPPC. All requests must be electronically submitted to Western at Western Regional Office Contact e-mail address (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm). Western will not perform economic planning studies but will coordinate the performance of such studies with TEPPC. The economic planning study cycle will be that of the TEPPC process

(a) Process for Handling Economic Transmission Planning Study Requests by Western. Western shall ensure that any economic planning study requests are properly handled under this Attachment P by:

i. TEPPC Master List. Forwarding the Requestor to TEPPC for inclusion in the TEPPC Master List of economic planning studies for the Western Interconnection and for consideration by TEPPC as a priority request. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

(b) Process for Handling Economic Study Requests Received by TEPPC. TEPPC will review economic planning study requests received from Requesters directly or from Western. TEPPC shall review such study requests during its open stakeholder meeting and, together with its stakeholders, prioritize requests for economic planning studies. Western will participate in the TEPPC prioritization process and provide input as to whether a study request should be included in the TEPPC study plan. The Requester is also encouraged to participate and provide input in the TEPPC prioritization process. For more detail regarding the TEPPC economic planning study process, see the executive summary overview of the TEPPC Transmission Planning Protocol. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

(c) Low Priority Economic Study Requests. If TEPPC determines, after reviewing through an open stakeholder process, that the requested economic planning study is not a priority study, the Requester may have a third party perform the economic planning analysis at the Requester's expense. The Requester will have use of the TEPPC economic study data base and Western will support the Requester in ensuring that the study is coordinated as necessary through local, subregional or regional planning groups.

(d) Clustering Local Priority Economic Planning Studies. TEPPC may determine that any number of Requesters' economic planning study requests should be studied together with other requests.

(e) Cost Responsibility for Economic Planning Studies

i. Priority and Non-Priority Local Economic Planning Studies. Western cannot fund any Priority and Non-Priority local economic planning studies due to its spending authorization being contingent upon Congressional Appropriations. In the event that Western is requested to perform an economic planning study, Western will, at the Requesters expense,

provide its assistance in having a third party perform the economic planning study. The Requester will have use of the TEPPC economic study data base and Western will support the Requester in ensuring that the study is coordinated as necessary through local, subregional or regional planning groups.

ii. Priority Regional Economic Planning Studies. Regional economic studies are performed by TEPPC and funded by WECC.

(f) Exchange of Data Unique to Economic Planning Studies

i. All data used for its economic planning studies from the TEPPC data base.

ii. Requester's request for detailed base case data must be submitted to WECC in accordance with the WECC procedures.

iii. All requests made to Western for economic planning studies and responses to such requests shall be posted on the Western OASIS and the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)), subject to confidentiality requirements.

(g) Western Point of Contact for Study Requests. Western will identify a Point of Contact on its OASIS to respond to customer/stakeholder questions regarding modeling, criteria, assumptions, and data underlying economic planning studies. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

1.1.7 Stakeholder Participation in Western Study Plans and Planning Results. Western will hold a public planning meeting to review and discuss its transmission study plans and planning results (see Part II Section 1.2.2 below).

1.1.8 Western Study Criteria and Guidelines. Requesters should refer to the Western Planning Criteria document for Western planning criteria, guidelines, assumptions and data. The Western Planning Criteria are posted on the OASIS. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

1.1.9 Western and Stakeholder Alternative Solutions Evaluation Basis. Western's planning process is an objective process that evaluates use of the transmission system on a comparable basis for all customers. All solution alternatives that have been presented on a timely basis (per Part II Section 1.1.4 of this Attachment P), including transmission solutions, generation solutions and solutions utilizing demand response resources, whether presented by Western or another Stakeholder, will be evaluated on a comparable basis. The same criteria and evaluation process will be applied to competing solutions and/or projects, regardless of type or class of Stakeholder. Solution alternatives will be evaluated against one another on the basis of the following criteria to select the preferred solution or combination of solutions: (1) ability to practically fulfill the identified need; (2) ability to meet applicable reliability criteria or NERC Planning Standards issues; (3) technical, operational and financial feasibility; (4) operational benefits/constraints or issues; (5) cost-effectiveness over the time frame of the study or the life of the facilities, as appropriate (including adjustments, as necessary, for operational benefits/constraints or issues, including dependability); and (6) where applicable, consistency with State or local integrated resource planning requirements, or regulatory requirements, including cost recovery through regulated rates.

1.2 Open Public Planning Meetings. Western will conduct at least two open public planning meetings each year, in coordination with four SWAT open public transmission planning meetings, including one joint meeting with CCPG and SSPG that will allow and encourage customers, interconnected neighbors, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, and other stakeholders to participate in a coordinated, nondiscriminatory process for development of Western's transmission plan.

1.2.1 Purpose and Scope. Western's open public transmission planning meetings will provide an open transparent forum whereby electric transmission stakeholders can comment and provide advice to Western during all stages of its transmission planning. These public transmission planning meetings will serve to:

(a) Provide a forum for open and transparent communications among area transmission providers, customers, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, and other interested stakeholders;

(b) Promote discussion of all aspects of Western's transmission planning activities, including, but not limited to, methodology, study inputs and study results; and

(c) Provide a forum for Western to understand better the specific electric transmission interests of all stakeholders.

1.2.2 Public Planning Meeting Process.

(a) Open Stakeholder Meetings. All public transmission planning meetings will be open to all stakeholders.

(b) Planning Meeting Schedule. Western will establish its public planning meeting schedule as needed, but no less than twice annually.

(c) Meeting Purpose. Meetings will be conducted to (i) allow Western to maximize its understanding of its customers' forecast needs for Western's transmission system; (ii) offer customers, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, and other stakeholders an opportunity to be informed about, offer input and advice into, Western's transmission system and planning process, as well as to propose alternatives for any upgrades identified by Western; (iii) review study results; and (iv) review transmission plans.

(d) Coordination with SWAT, CCPG and SSPG. Western's local transmission planning process will be coordinated with the SPGs through quarterly planning meetings described in more detail below (see Part II Section 2.2.7).

(e) Posting of Meeting Notices. All meeting notices, including date, time, place and draft meeting agenda, will be posted on Western's OASIS and the WestConnect website (see Western Attachment P Hyperlinks List(www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)), and distributed to Western customer 30 days prior to the public planning meeting.

(f) Posting of Study Plans and Planning Results. Study plans and planning results will be posted on Western's OASIS and the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)),

and distributed to Western's customers two weeks prior to the public planning meeting.

(g) Meeting Process. At the public planning meetings, Western will (i) review its transmission planning process and current study plan with stakeholders; (ii) request stakeholder review of the current study plan; (iii) provide an opportunity for comment on any aspect of its transmission planning process; (iv) invite the submittal of transmission study requests from stakeholders for review and discussion; and (v) provide updates on its planned projects. During the meeting, and for fifteen (15) calendar days following the meeting, all stakeholders and interested parties will be encouraged to provide Western with any comments on the study results presented in the public meeting. The final local study results and study plan will be posted on Western's OASIS and the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

(h) Electronic Input and Comments. Stakeholders and interested parties are also encouraged to provide input, comments, advice and questions on Western's transmission planning process at any time by sending e-mails to Western Regional Office Contact e-mail address (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm).

(i) Public Planning Meeting Agenda.

i. It is anticipated that in the 2nd Quarter meetings, Western will review information on loads, resources (including demand response resources) and other needs received by March15 from its transmission customers pursuant to Part II Sections 1.1.4(b) and (c) for inclusion in a draft study plan.

ii. It is anticipated that in the 4th Quarter meetings, Western will review planning study requests received by each Regional Office pursuant to Part II Section 1.1.6 and present a draft of its ten year plan for stakeholder review and comment.

iii. This schedule may be modified to coordinate with the subregional and regional transmission planning processes, subject to posting on Western's OASIS and the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

(j) Western Customer Distribution List. All existing Western customers, network and point-to-point, will be included on the distribution list and actively notified via e-mail of all upcoming public planning meetings. Any other stakeholder, including but not limited to, sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, wanting to be included on Western's e-mail distribution list should submit its information to Western's Point of Contact at Western Regional Office Contact e-mail address (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm).

(k) Posting of Meeting Documents. Western will post all meeting-related notes, documents and draft or final reports on its OASIS and the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

(l) Posting of Public Documents. In order to permit all stakeholders access to the information posted on the OASIS and WestConnect websites, only public information will be shared, and public business conducted, in the open public planning meetings.

1.3 Ten Year Transmission System Plan. Each year Western uses the planning process described in Part II Section 1.1 above to update its Ten Year Transmission System Plan. The Ten Year Transmission System Plan identifies all of its new transmission facilities, 115 kV and above, and all facility replacements/upgrades required over the next ten years to reliably and economically serve its loads.

2.0 Subregional and Regional Coordination

Regional Planning and Coordination at the WestConnect-SWAT,-CCPG and-SSPG subregional level.

2.1 Overview. Western is a party to the WestConnect STP Project Agreement ((see Western Attachment P Hyperlinks List) www.wapa.gov/Transmission/Planning.htm)), and is actively engaged in the SWAT, CCPG and SSPG planning groups. The WestConnect footprint, which includes the regions covered by SWAT, CCPG and SSPG, encompasses the states of Arizona, Colorado, New Mexico, Nevada, and parts of California, Texas, and Wyoming. Western submits its transmission plans to its relevant subregional transmission planning group as required for inclusion in and coordination with the SPG's transmission plan. Western actively participates in the SPG transmission planning process to ensure that Western's data and assumptions are coordinated with the subregional plan. The WestConnect planning manager will ensure that

the subregional transmission plan is coordinated to produce the WestConnect Transmission Plan.

2.2 The Subregional Transmission Planning Process.

2.2.1 SWAT,-CCPG and SSPG's Role. Each SPG tasked with bringing transmission planning information together and sharing updates on active projects within the various subregions. The SPG's provide an open forum where any stakeholder interested in the planning of the transmission system in each footprint including sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, can participate and obtain information regarding base cases, plans, and projects and to provide input or express its needs as they relate to the transmission system. SWAT, CCPG and SSPG do not conduct economic planning studies.

2.2.2 Membership. The subregional transmission planning groups are comprised of transmission providers, transmission users, transmission operators, state regulatory entities and environmental entities. Membership is voluntary and open to all interested stakeholders including sponsors of transmission solutions, generation solutions and solutions utilizing demand resources. Western will participate in SWAT, CCPG and SSPG and relevant SPG subcommittees and work groups and will submit its Ten Year Transmission Plans to the relevant work groups. Western's Ten Year Transmission Plans will then be incorporated with the SWAT, CCPG and SSPG subregional transmission plans in accordance with the WestConnect STP Project Agreement. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)). Western will incorporate any applicable information, data or study results from SWAT, CCPG or SSPG into its planning process.

2.2.3 Subregional Coordination. The SPG's role is to promote subregional transmission planning and development and to ensure that all of the individual transmission plans are coordinated in order to maximize use of the existing transmission system and identify the transmission expansion alternatives that most effectively meet future needs.

2.2.4 Open Subcommittee Forum. All SPG subcommittee planning groups provide a forum for entities including sponsors of transmission solutions, generation solutions and solutions utilizing demand resources, within each respective region, and any other interested parties, to determine and study the needs of the region as a whole.

2.2.5 Forum for Project Sponsors. The SPGs also provide a forum for transmission project sponsors to introduce their specific projects to interested stakeholders and potential partners and allows for joint study of these projects, coordination with other projects, and project participation, including ownership from other interested parties.

2.2.6 Subregional Open Planning Meetings. All SPG transmission planning process for the high voltage and extra high voltage system is open to all transmission customers and stakeholders wishing to participate. Western will assist transmission customers and stakeholders interested in becoming involved in the subregional transmission planning process including sponsor of transmission solutions, generation solutions, and solutions utilizing demand resources, by directing them to appropriate contact persons and websites. All transmission customers and stakeholders are encouraged to bring their plans for future generators, demand resources, loads or transmission services to the SPG planning meetings.

2.2.7 Meeting Agendas. The meeting agendas for the SPG's, WestConnect, Western and any other planning meetings scheduled in conjunction with the SPG meetings will be sufficiently detailed, posted on the WestConnect website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)) and circulated in advance of the meetings in order to allow customers and stakeholders the ability to choose their meeting attendance most efficiently.

2.3 WestConnect's Role in the Subregional Transmission Planning Process.

2.3.1 WestConnect STP Project Agreement. Each WestConnect party is a signatory to the West Connect STP Project Agreement ((see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)) which formalizes the parties' relationships and establishes obligations among the signatory transmission providers to coordinate subregional transmission planning among the WestConnect participants and the subregional planning groups (SWAT, CCPG, and SSPG), participate in the SWAT, CCPG and SSPG subregional transmission planning groups, as appropriate, and produce a WestConnect Transmission Plan. The WestConnect STP Project Agreement is also open for participation by other non-WestConnect transmission providers that participate in the transmission planning activities of SWAT, CCPG and SSPG or any other subregional transmission planning group that may form within the WestConnect footprint.

2.3.2. WestConnect Objectives and Procedures for Regional Transmission Planning. Under the WestConnect Objectives and Procedures for Regional Transmission Planning, Western, along with the other WestConnect STP Project Agreement participants, agrees to work through the SWAT, CCPG and SSPG planning processes to integrate its Ten Year Transmission Plans with the other WestConnect participant transmission plans into one ten year regional transmission plan for the WestConnect footprint by:

(a) Actively participating in the subregional transmission planning processes, including submitting its respective expansion plan, associated study work and pertinent financial, technical and engineering data to support the validity of Western's plan;

(b) Coordinating, developing and updating common base cases to be used for all study efforts within the SWAT, CCPG and SSPG planning groups and ensuring that each plan adheres to the common methodology and format developed jointly by WestConnect subregional planning groups for this planning purpose;

(c) Providing funding for the WestConnect STP Project Agreement planning management functions pursuant to the WestConnect STP Project Agreement;

(d) Retaining an independent facilitator to oversee the WestConnect STP Project Agreement process, ensure comparability among the subregional processes and perform the study work required to pull all the plans together;

(e) Maintaining a regional planning section on the WestConnect website where all WestConnect planning information, including meeting notices, meeting minutes, reports, presentations, and other pertinent information is posted; and

(f) Posting detailed notices on all SWAT, CCPG and SSPG meeting agendas on the WestConnect website. (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

2.3.3. WestConnect Planning Meetings. WestConnect hosts two open public stakeholder meetings for transmission planning per year, one in the 1st Quarter and one in the 4th Quarter.

2.3.4. WestConnect Role in Economic Planning. WestConnect will provide advice, on an as needed basis, to TEPPC regarding prioritizing regional economic planning study requests and potential clustering of requested regional economic planning studies, if those studies involve facilities in the WestConnect footprint. WestConnect will not conduct economic planning studies.

2.4. Quarterly Schedule of Subregional and Local Transmission Planning Meetings. Western will coordinate with SWAT, CCPG and SSPG in order to assure that quarterly meetings are times in order to allow projects to escalate from local to subregional to regional councils in a timely fashion.

The proposed focus of the SPG meetings, WestConnect transmission planning meetings and Western public planning meetings will be:

2.4.1. 1st Quarter Meetings

SPG Meetings.

- Approve the final SPG reports for the previous year's study work.
- Approve the SPG study plans for the new year.

WestConnect Planning Annual Meeting (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)).

- Present the WestConnect Ten Year Transmission Plan and WestConnect Transmission Planning Study Report to the Planning Management Committee.

- Recommend approval of the WestConnect Ten Year Transmission Plan by the WestConnect Steering Committee.

- Recommend approval of the WestConnect Transmission Planning Study Report by the WestConnect Steering Committee.

- Approve WestConnect study plans for the new year.

- Propose adjustments to the planning process or budget for the current year as necessary or appropriate.

2.4.2. 2nd Quarter Meeting

SPG Meetings.

- Present preliminary SPG study results.
- Determine additional SPG study sensitivities

Western Planning Stakeholder Meetings:

- Western reviews its transmission planning process and current study plan with transmission customers and stakeholders, and requests their review, comment and advice on any aspect of its transmission planning process. Additionally, Western reviews information on loads, resources and other needs received by March 31 from its transmission customers.

2.4.3. 3nd Quarter Meeting

SPG Meetings.

- Annual Joint SWAT-CCPG-SSPG meeting. SWAT, CCPG and SSPG present current study results and approve key results, findings, and conclusions.

- SWAT specifically invites customer and stakeholder review, comment, advice and transmission study requests for the SWAT transmission planning process.

2.4.4. 4th Quarter Meeting

SWAT Meeting:

- Present draft SPG reports for approval with modifications.

- Specifically invite the submittal of transmission study requests from stakeholders for inclusion in their respective study plans.

WestConnect Planning Workshop:

- Present each current year study supported by (i) final report or (ii) status summary report.

- Present each WestConnect transmission provider's draft ten year transmission plan. Present proposed study plans from SWAT, CCPG and SSPG.

- Discuss future study needs with input from

    - Study groups

- TEPPC
- Other subregional planning groups
- Stakeholders at large

- Draft the WestConnect Ten Year Transmission Plan.

- Draft the WestConnect Transmission Planning Study Report.

Western Planning Stakeholder Meeting:

- Western reviews its transmission planning process and current study plan with stakeholders, and requests stakeholder review, comment and advice on any aspect of its transmission planning process. Additionally, Western reviews planning study requests received and presents a draft of its ten year plan for stakeholder review and comment per each Regional Office calendar.

3.0. Coordination at the Western Interconnection Level

Western will coordinate its plan on a west-wide regional basis through the SPGs and WestConnect. WestConnect will coordinate its subregional plan with the other subregional plans in the Western Interconnection and at the TEPPC level.

3.1. Procedures for Regional Planning Project Review.

3.1.1. WECC coordination of reliability planning.

(a) WECC develops the Western Interconnection-wide coordinated base cases for transmission planning analysis such as power flow, stability and dynamic voltage stability studies. The WECC approved base cases are used for study purposes by transmission planners, subregional planning groups, and other entities that have signed confidentiality agreements with WECC.

(b) WECC also maintains a data base for reporting the status of all planned projects throughout the Western Interconnection.

(c) WECC provides for coordination of planned projects through its Procedures for Regional Planning Project Review.

(d) WECC's Path Rating Process ensures that a new project will have no adverse effect on existing projects or facilities.

3.1.2. WECC Open Stakeholder Meetings. Western Interconnection-wide economic planning studies are conducted by the WECC TEPPC in an open stakeholder process that holds region-wide stakeholder meetings on a regular basis. The WECC-TEPPC Transmission Planning Protocol, including the TEPPC procedures for prioritizing and completing regional economic studies, is posted on the WECC website (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)). Western participates in the region-wide planning processes, as appropriate, to ensure that data and assumptions are coordinated.

3.1.3. Role of WECC TEPPC. WECC TEPPC provides two main functions in relation to Western's planning process:

(a) Development and maintenance of the west-wide economic planning study database.

i. TEPPC uses publicly available data to compile a database that can be used by a number of economic congestion study tools.

ii. TEPPC's database is publicly available for use in running economic congestion studies. For an interested transmission customer or stakeholder to utilize WECC's Pro-Mod planning model, it must comply with WECC confidentiality requirements.

(b) Performance of economic planning studies. TEPPC has an annual study cycle described in the WECC-TEPPC Transmission Planning Protocol (see Western Attachment P Hyperlinks List (www.oasis.oati.com/WAPA/WAPAdocs/Planning-Process.htm)), during which it will update databases, develop and approve a study plan that includes studying transmission customer high priority economic study requests as determined by the open TEPPC stakeholder process, perform the approved studies and document the results in a report.

4.0. Dispute Resolution

Western Interconnection Western Regional Offices adhere to the WECC Dispute Resolution process.

5.0. Cost Allocation for New Transmission Projects

5.1. Western will utilize a case-by-case approach to allocate costs for new transmission projects. This approach will be based on the following principles:

5.1.1. Open Season Solicitation of Interest. Project sponsor announces project and actively or verbally solicits interest in the project through informational meetings, information posted on the project sponsor's website, and industry press releases. For any transmission project identified in a Western reliability study in which Western is the project sponsor, Western may elect to hold an "open season" solicitation of interest to secure additional project participants. Upon a determination by Western to hold an open season solicitation of interest for a transmission project, Western will:

(a) Announce and solicit interest in the project through informational meetings, its website and/or other means of dissemination as appropriate.

(b) Hold meetings with interested parties and meetings with public utility staffs from potentially affected states.

(c) Post information via WECC's planning project review reports

(d) Develop the initial transmission project specifications, the initial cost estimates and potential transmission line routes; guide negotiations and assist interested parties to determine cost responsibility for initial studies; guide the project through the applicable line siting processes; develop final project specifications and costs; obtain commitments from participants for final project cost shares; and secure execution of construction and operating agreements.

5.1.2. Western Coordination within a Solicitation of Interest Process.

Western, whether as a project sponsor or a participant, will coordinate as necessary with any other participant or sponsor, as the case may be, to integrate into Western's Ten Year Transmission Plan any other planned project on or interconnected with Western's transmission system.

5.1.3 Western Projects without a Solicitation of Interest.

Western may elect to proceed with small and/or reliability transmission projects without an open season solicitation of interest, in which case Western will proceed with the project pursuant to its rights and obligations as a transmission provider.

5.1.4 Allocation of Costs.

(a) Proportional Allocation.

For any transmission project entered into pursuant to an open season solicitation process, project costs and associated transmission rights, will generally be allocated proportionally to project participants' respective ownership shares, subject to a negotiated participation agreement. In the event the open season process results in a single participant, the full cost and transmission rights will be allocated to that participant. Nothing in this section precludes project participants from utilizing another cost allocation methodology, provided, all project participants agree to the alternative.

(b) Economic Benefits or Congestion Relief.

For a transmission project wholly within Western’s local transmission system that is undertaken for economic reasons or congestion relief at the request of a Requester, the project costs will be allocated to the Requester.

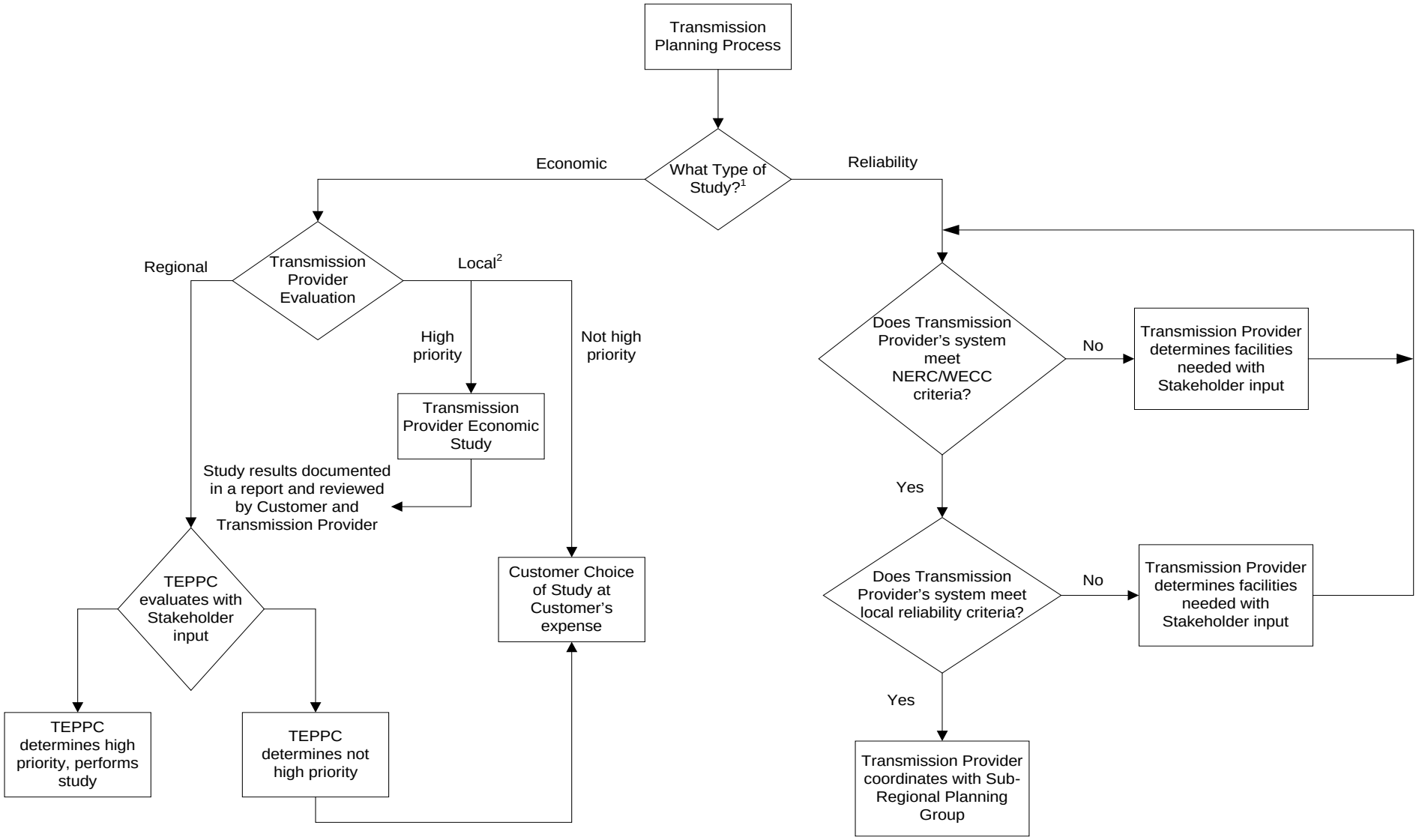
(c) Western Rate Recovery.

Notwithstanding the foregoing provisions, Western will not assume cost responsibility for any transmission project if the cost of the project is not reasonably expected to be recoverable in its transmission rates.

(d) Exclusions.

The cost for transmission projects undertaken in connection with requests for interconnection or transmission service on Western’s transmission system, which are governed by existing cost allocation methods within Western’s OATT, will continue to be so governed and will not be subject to the principles of this section 5.1.

Exhibit 1



1. Generator Interconnection Request studies are performed pursuant to the Large Generator Interconnection Procedure contained in the Transmission Provider's Open Access Transmission Tariff (OATT). Transmission Service Requests are also performed pursuant to OATT procedures.

2. All requests for economic planning studies received by the Transmission Provider are forwarded to TEPPC for inclusion in the TEPPC Master List. TEPPC will evaluate only those requests that have regional impacts.