



Order 1920 and State PUC Engagement

Presentation to NARUC Transmission States Working Group (TSWG)

September 25, 2024

Claire Wayner



Agenda

1. Overview of states' roles in Order 1920 compliance
2. Status of Order 1920 implementation by region

Order 1920 involves state engagement at several key decision points

- Scenario development for long-term planning (focus of today)
 - Order 1920 requires the consideration of seven factors
 - States should monitor transmission providers' scenario development for all factors, with a particular eye to factors #1-5 and #7
- Cost allocation (future meeting of TSWG)
 - Order 1920 requires a six-month **State Engagement Period** during which transmission providers are required to engage **Relevant State Entities**
 - Note that Order 1920 does not require transmission providers to file what Relevant State Entities request

Order 1920 requires consideration of seven factors in scenario design

- Federal, state, Tribal, and local laws and regulations affecting the resource mix and demand*
 - *E.g.) Renewable Portfolio Standard laws*
- Federal, state, Tribal, and local laws and regulations affecting decarbonization and electrification*
 - *E.g.) state law banning new gas car sales by 2035*
- State-approved IRPs and expected service obligations for LSEs*
- Trends in fuel costs and in the cost, performance, and availability of generation, electric storage resources, and building and transportation electrification technologies
- Resource retirements
 - *Note: States may have passed policies impacting pace of retirements*
- Generator interconnection requests and withdrawals
- Utility and corporate commitments and federal, Tribal, state, and local policy goals that affect Long-Term Transmission Needs

State regulators should develop policy matrices of potentially relevant policies

- State regulators can work with state legislators, governor's offices, and state energy offices to develop policy matrices with all relevant policies pertaining to factors #1-3, 5, and 7
 - Transmission providers could provide input on what policies are relevant (can be iterative)
- State regulators should monitor how factor #4 develops and could indicate key policies that could impact these trends
- State regulators should monitor the “best available data inputs” requirement under Order 1920
 - “Data inputs that are timely, developed using best practices and diverse and expert perspectives, and adopted via a process that satisfies the transmission planning principles of Order Nos. 890 and 1000” (P 633 of O. 1920)



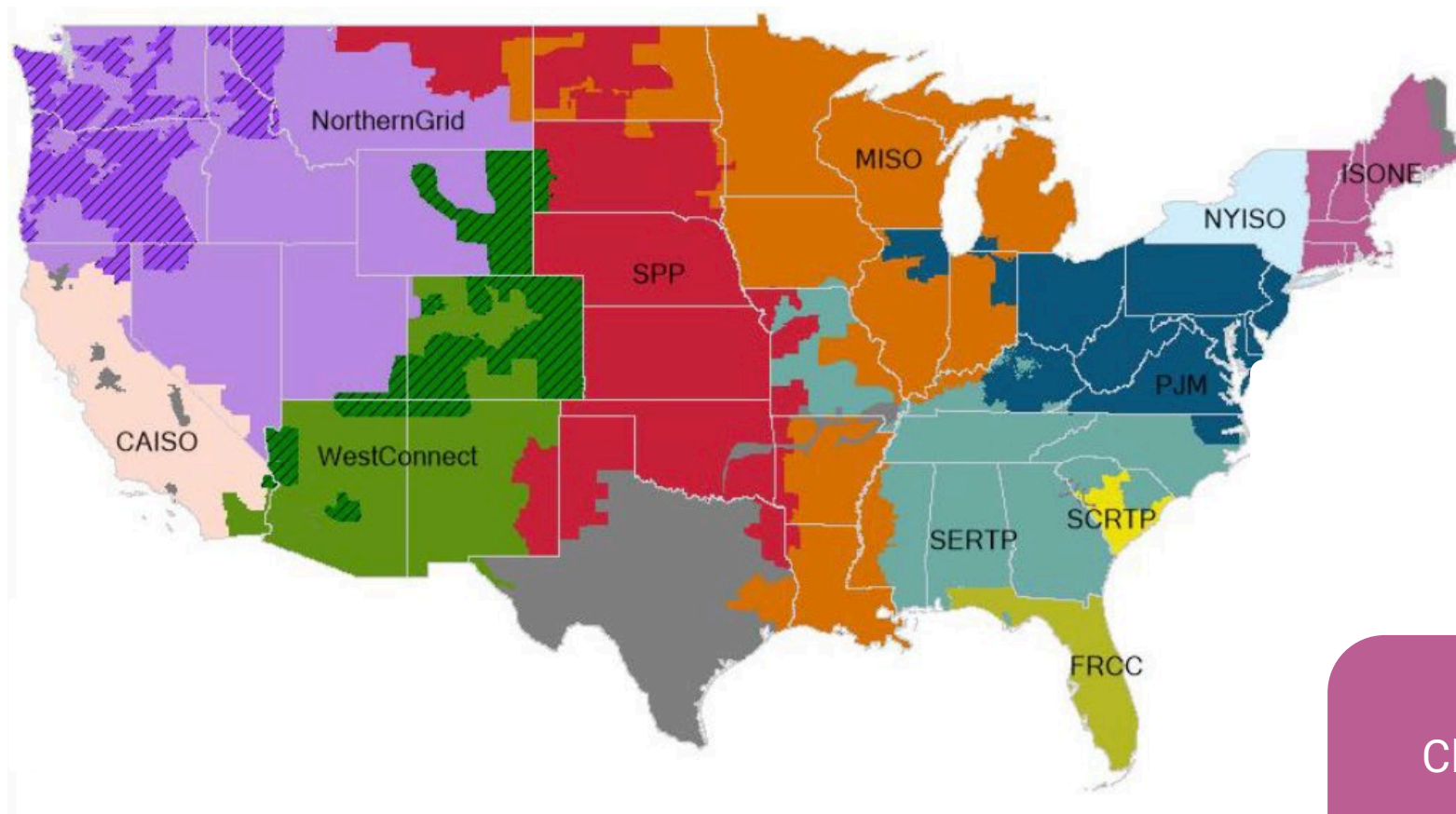
Status of Order 1920 Implementation by Region

Order 1920 compliance filings are due by next June 2025

- **From now until June 12, 2025:** Regions are developing compliance filings for FERC.
 - Engagement Period on cost allocation must last at least six months, so it must kick off no later than *January 2025*
- **After June 12, 2025:** Regions begin the first cycle of long-term planning
 - Cycles must occur no less frequently than every five years
 - *Note: Some regions are starting scenario development in parallel with preparing their compliance filings*

Disclaimer: This information is subject to change and is based on conversations with advocates, not with the planning regions.

Region-by-Region Outlook



ISO-NE

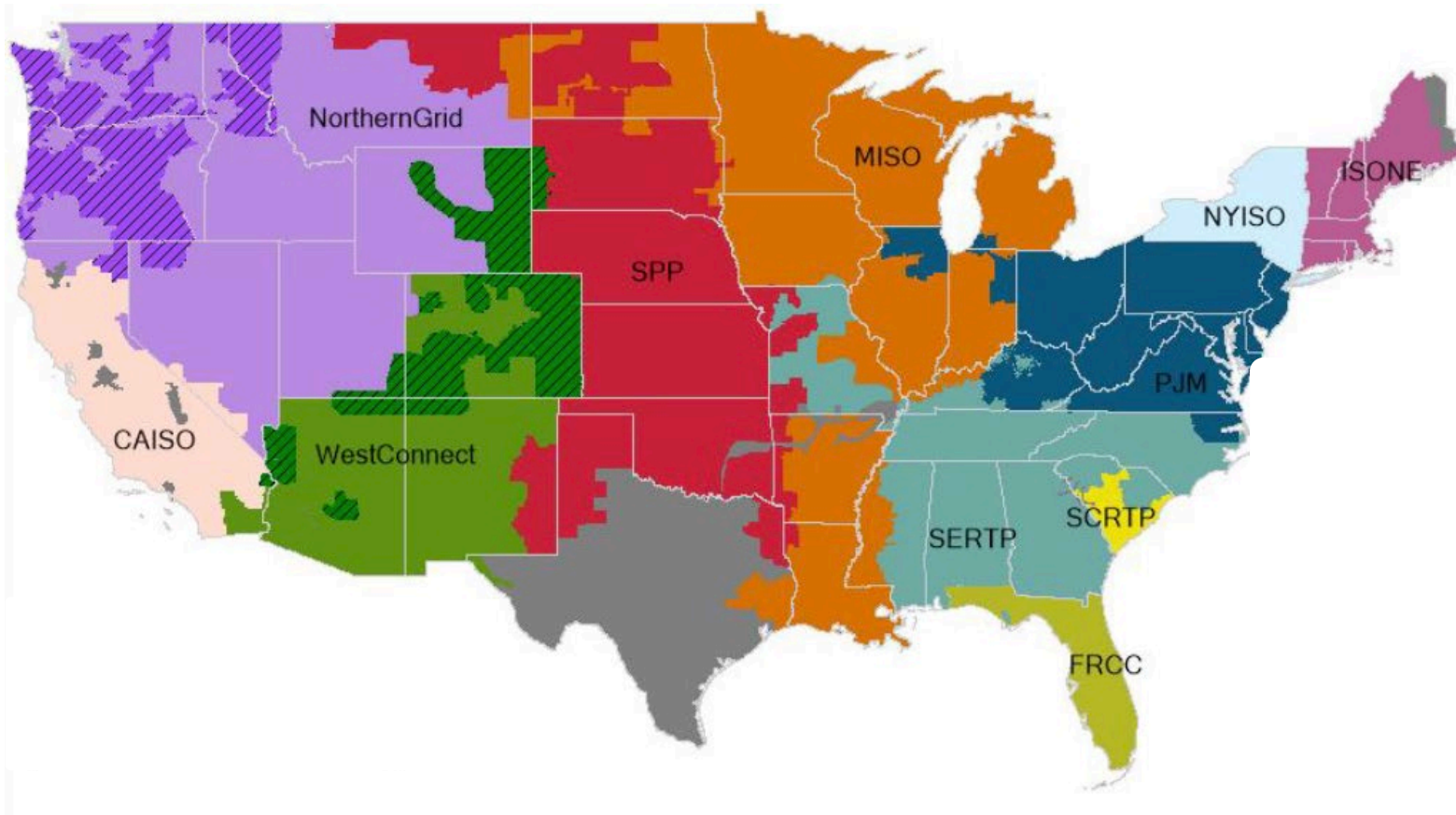
- Filed its Longer-Term Transmission Planning Process (LTTP) at FERC the week before Order 1920 was released
- LTTP contains ~80% of what is required under Order 1920
- LTTP preserves a robust role for states
- Has yet to start an Order 1920 compliance process

For more information...

Claire Lang-Ree and Anya Poplavska, "Bridging the Gap: New England's Transmission Planning and Order 1920," NRDC and Acadia Center, 9/11/24, [link](#)

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Region-by-Region Outlook

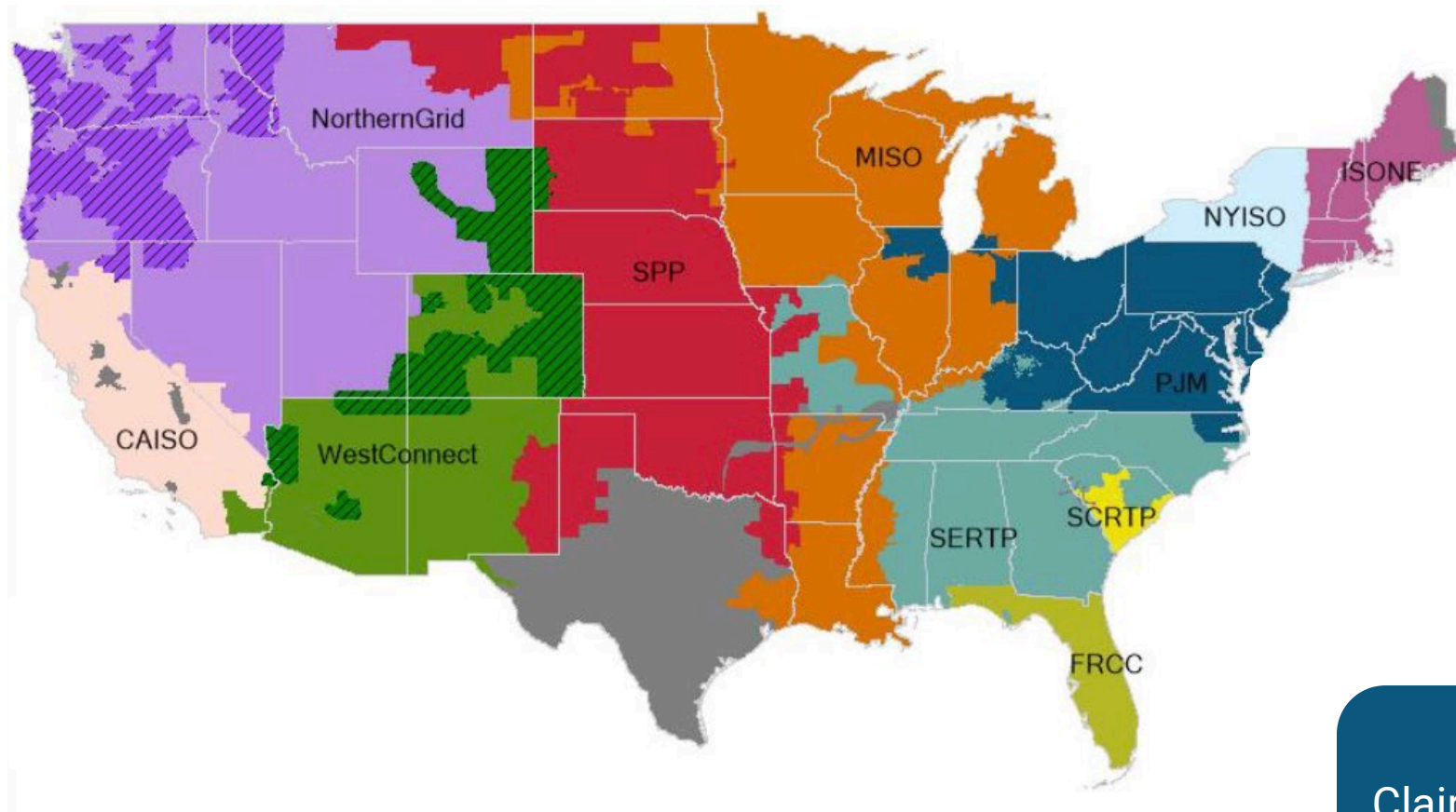


NYISO

- Gathering input and developing straw proposal through the fall and winter before developing tariff language in first half of 2025
 - Transmission Planning Advisory Subcommittee / Electric System Planning Working Group ([link](#))
- NYISO already prepares a 20-year System and Resource Outlook, which accomplishes many of the goals of Order 1920

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Region-by-Region Outlook



PJM

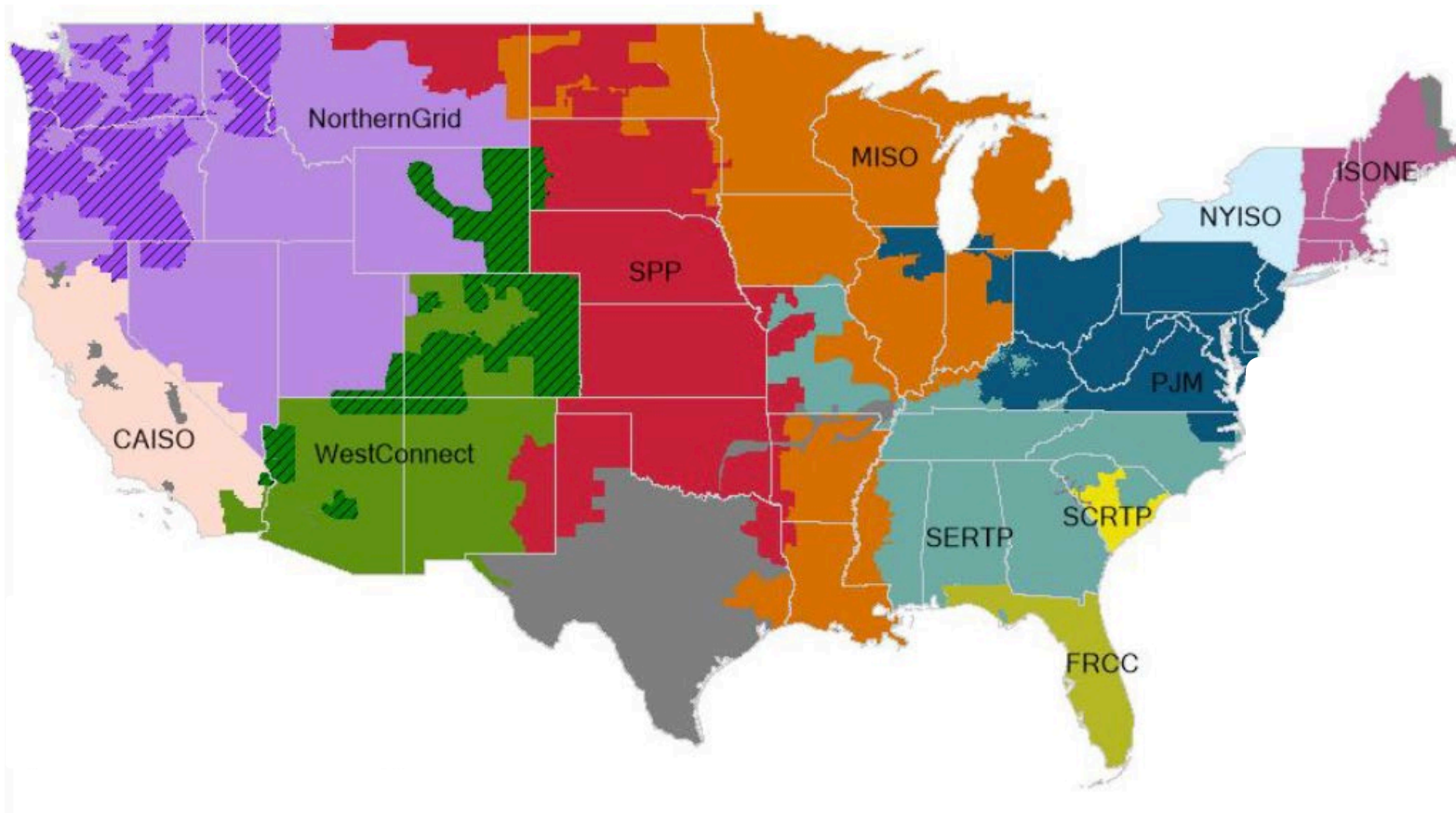
- Working on compliance through its Transmission Expansion Advisory Committee (TEAC)
- In parallel, developing scenario inputs for first round of long-term planning
- Building on previous Long-Term Regional Transmission Planning (LTRTP) framework

For more information...

Claire Wayner, "FERC Order 1920 Can Help PJM Plan for the Future," RMI, 5/31/24, [link](#)

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Region-by-Region Outlook

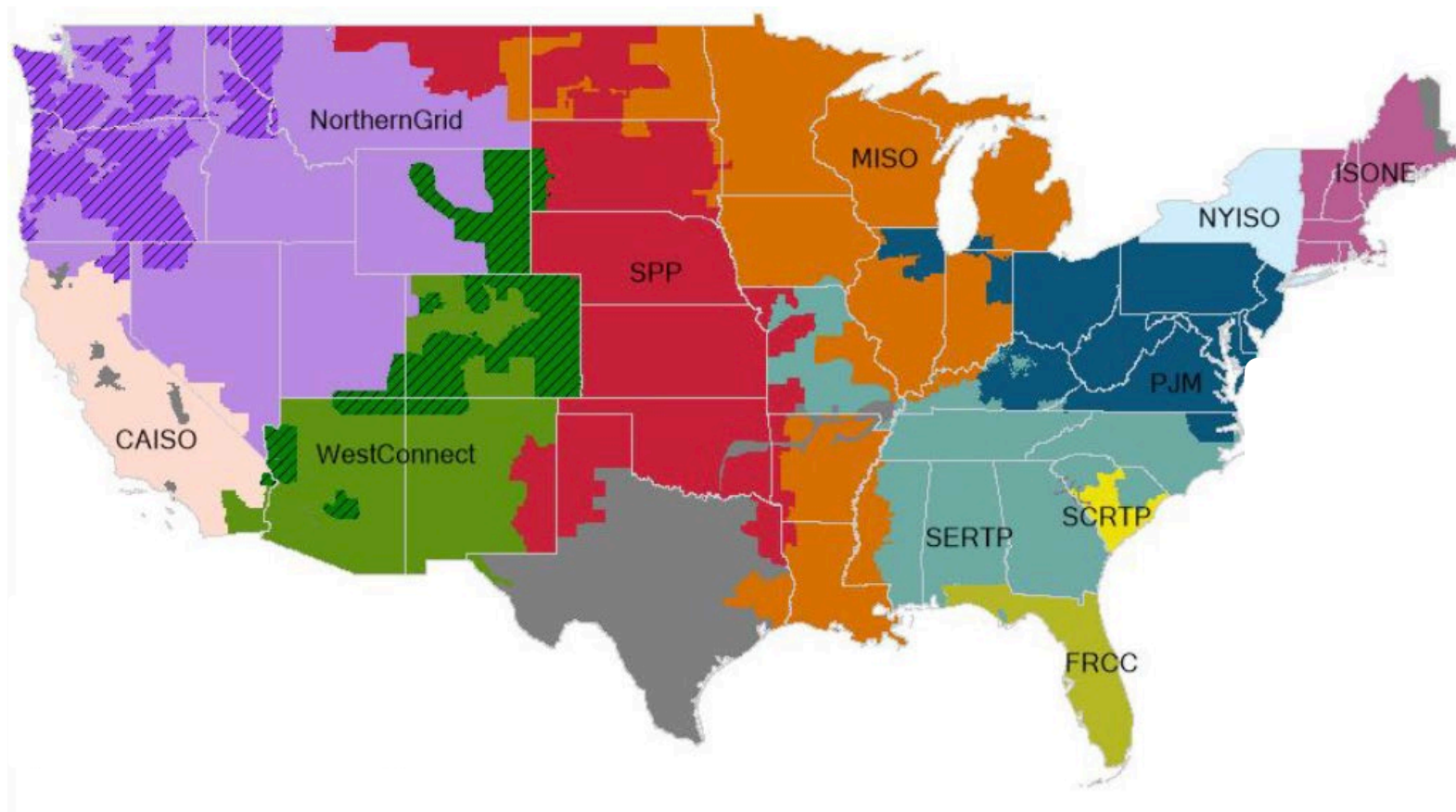


SERTP & SC RTP

- SERTP and SC RTP are combining to be one planning region
- Compliance efforts kicking off in November 2024 with utility-led education on Order 1920, followed by stakeholder presentations and compliance presentation
- Relevant State Outreach starting in November

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Region-by-Region Outlook

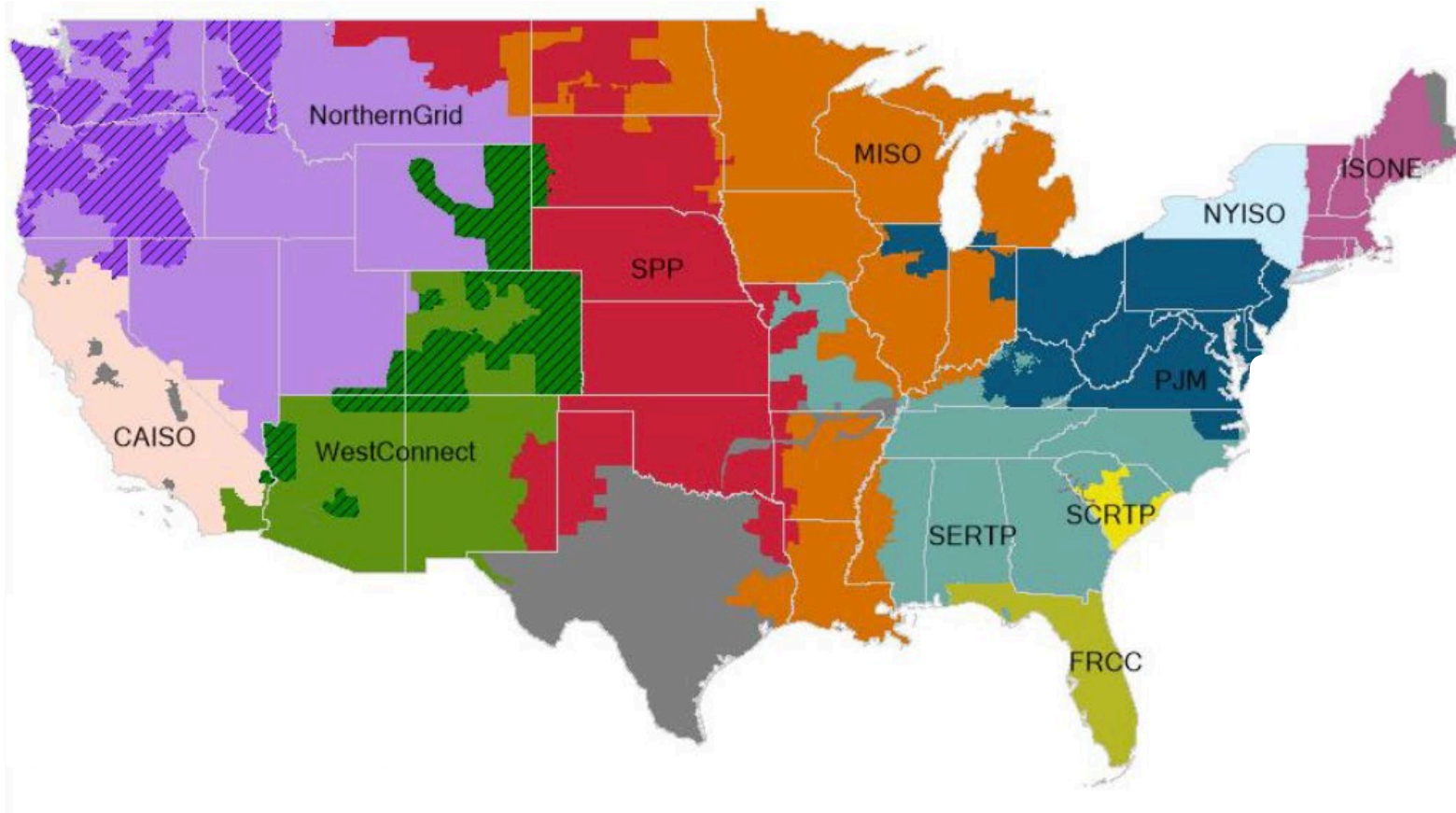


MISO

- Has been doing Long-Term Regional Planning (LRTP) for over a decade now
- Requesting a yearlong extension
- Already expected to be mostly in compliance

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Region-by-Region Outlook

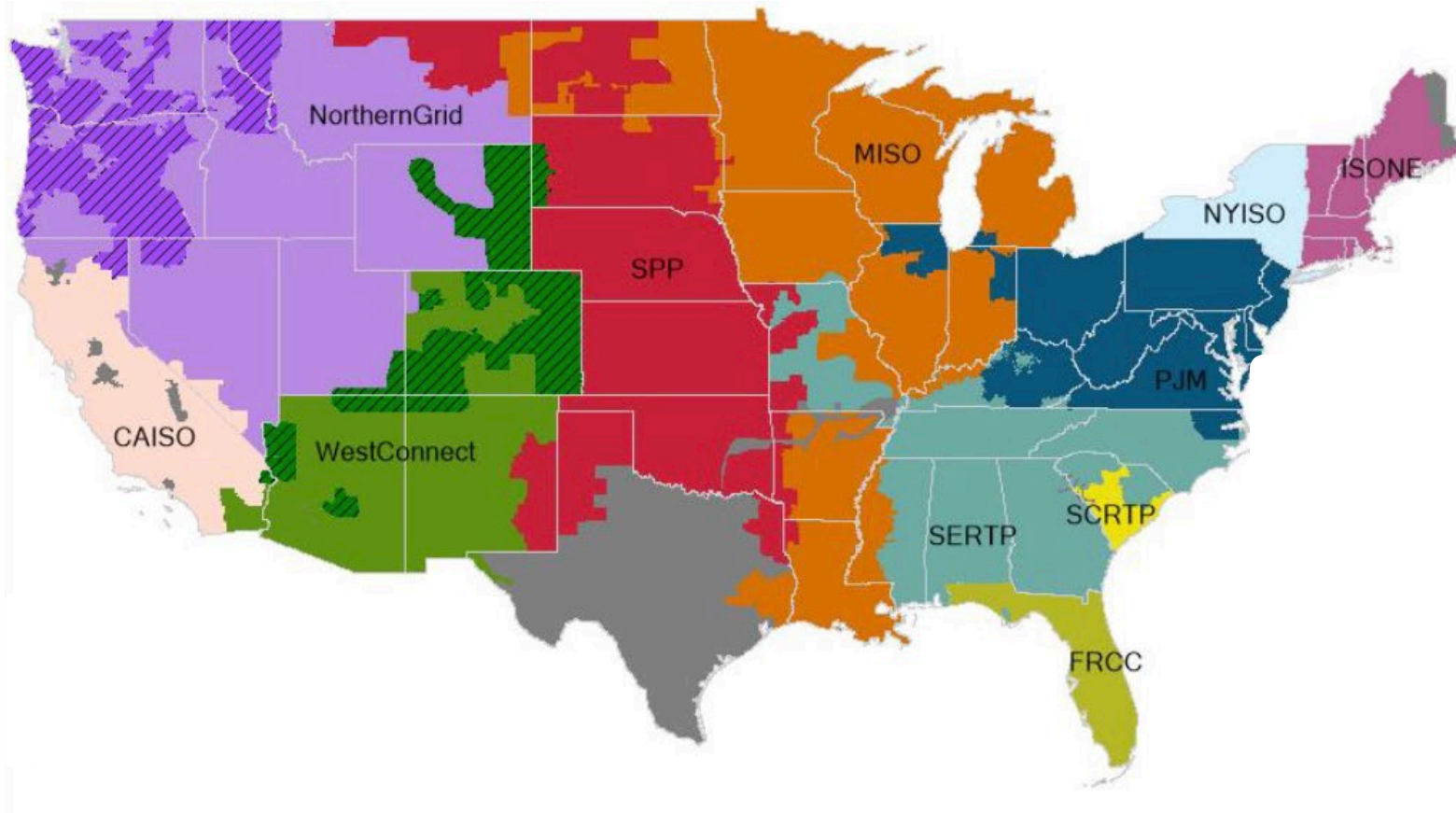


SPP

- Compliance to proceed through the Consolidated Planning Process Task Force (CPPTF)
 - Drafts to 3 attachments to be before the CPPTF by end of year

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Region-by-Region Outlook

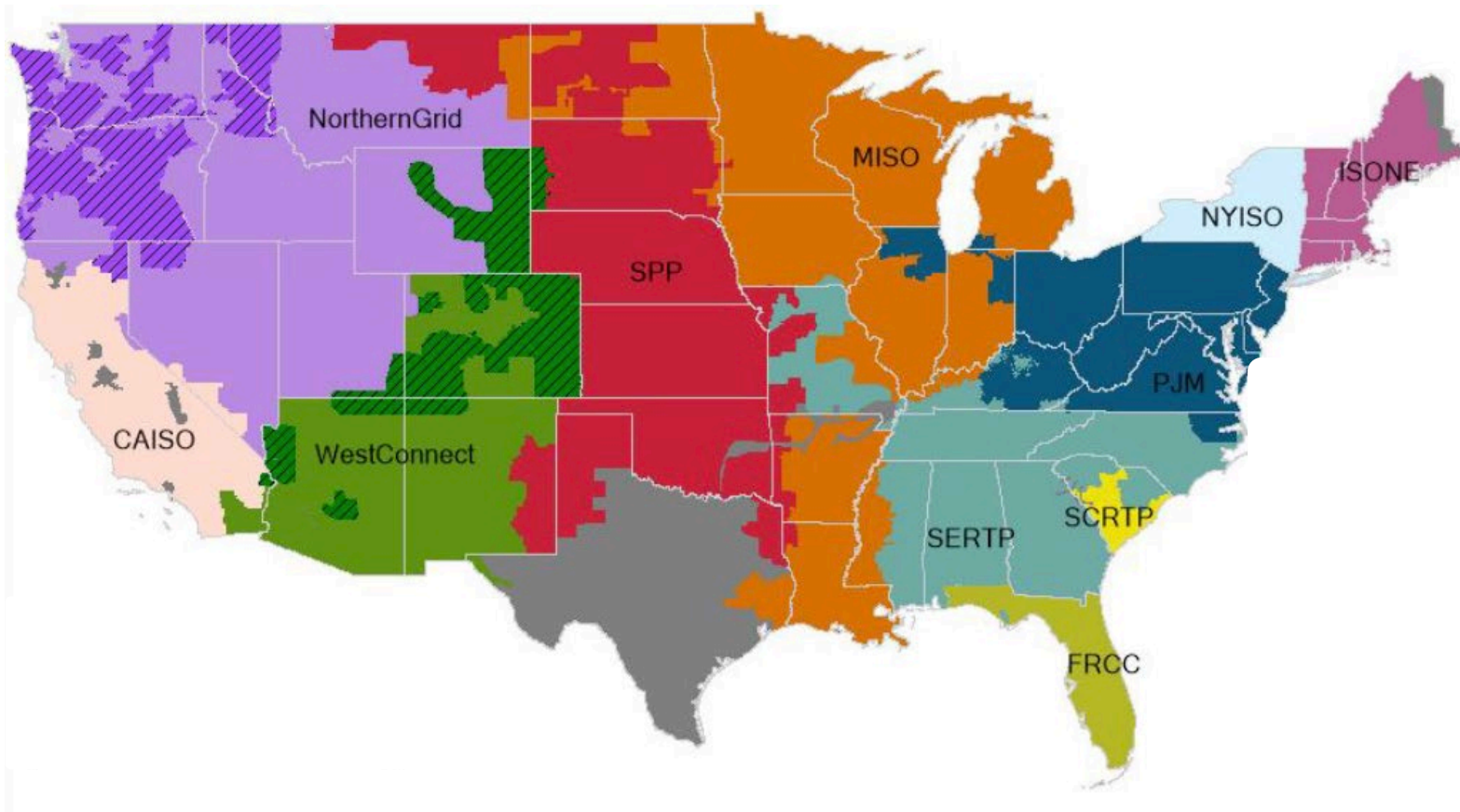


NorthernGrid

- Starting to engage state entities in October to go over plans for compliance

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Region-by-Region Outlook

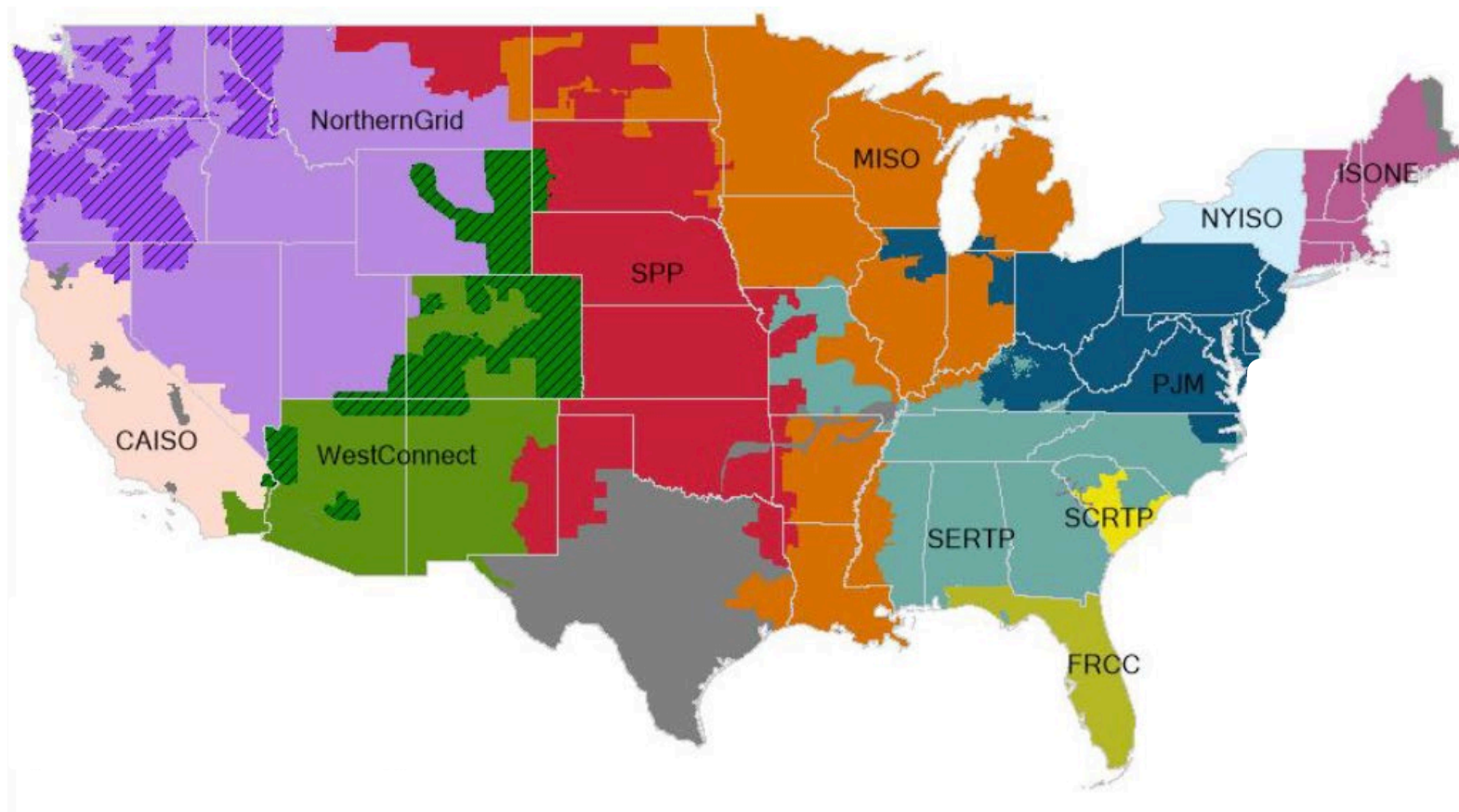


WestConnect

- No information shared by advocates

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Region-by-Region Outlook

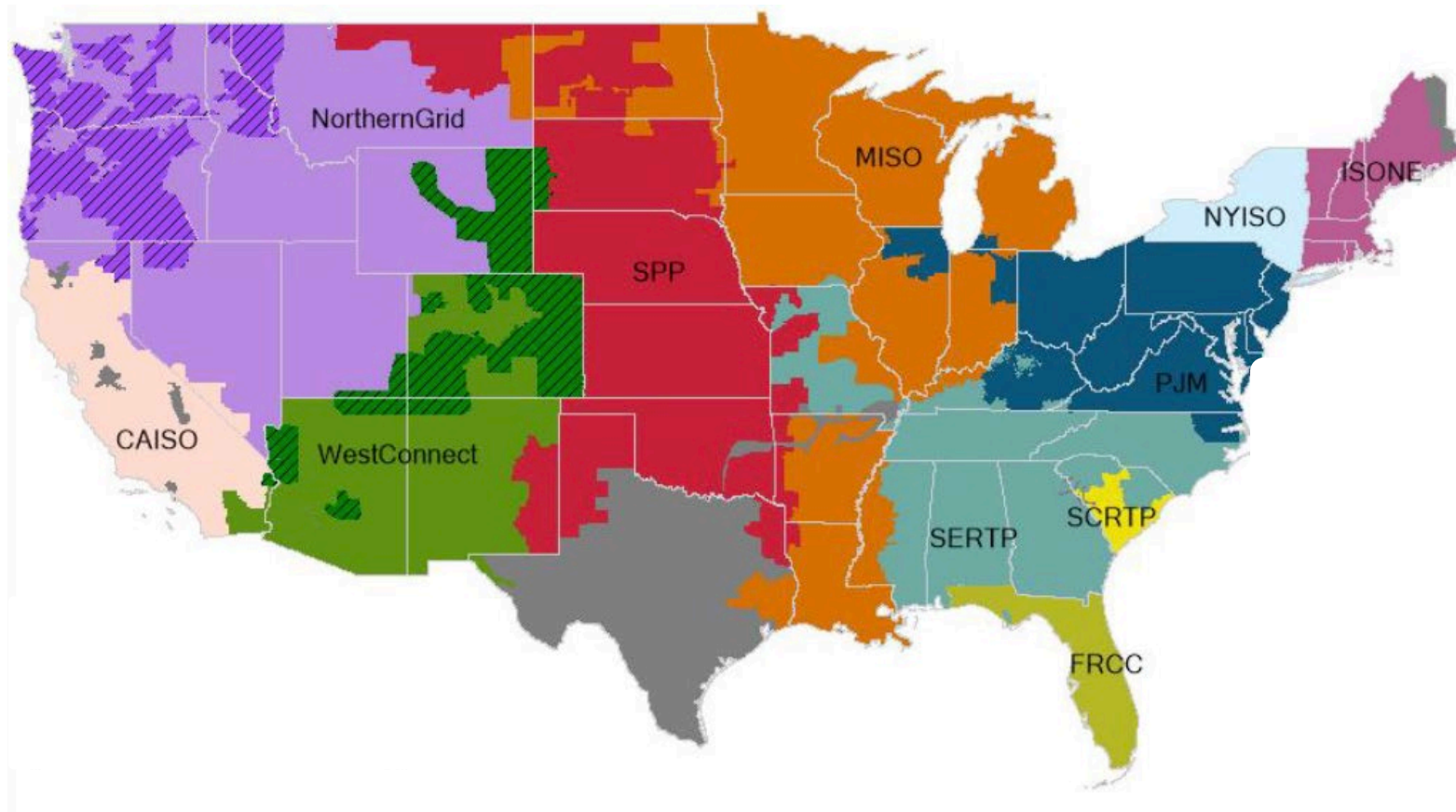


FRCC

- Advocates are unaware of any Order 1920 compliance conversations in this region

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Region-by-Region Outlook



CAISO

- Transmission Planning Process meets several Order 1920 requirements already
- Biannual 20-year Transmission Outlook is not a transmission plan but provides longer-term higher-level conceptual outlook
- Stakeholder process for Order 1920 likely to start this fall, not announced yet



For more information...

Claire Wayner, "Understanding FERC Order 1920," RMI, 2024, [link](#)

Thank you!

Claire Wayner

cwayner@rmi.org