



NARUC

National Association of Regulatory Utility Commissioners

**NARUC 2025 Winter Policy Summit
State Transmission Planning and Cost Allocation Workshop
February 23, 2025**

Reference Materials and Information for States

Engagement Period Timing

The Engagement Period is a six-month window of time prior to compliance in which Relevant State Entities (RSEs) meet and may provide input on cost allocation methods and processes. RSEs may request up to a 6-month extension to the Engagement Period, which automatically extends the Transmission Providers (TPs) compliance deadline. Information on the known Engagement Period timelines as well as sample Engagement Period action items and deliverables for RSEs are below.

Order 1920 Regional Engagement Period Timelines		
Region	Engagement Period Timeline	Notes
CAISO	11/1/2024 – 5/1/2025	Public process “will commence in early 2025”
ISO NE	9/9/2024 – 3/10/2025	With support from regulators, ISO-NE asked for an extension for both regional and interregional compliance filings to June 2027
MISO	TBD	MISO received an extension to 6/12/26 for regional planning. MISO will seek an extension for interregional compliance. Organization of MISO States (OMS) has begun discussions on O1920 Compliance even though Engagement Period has not started.
NYISO		Aug-Sept receive comments; Oct – Dec develop proposal, Jan – June develop tariff.
PJM	10/7/2024 – 4/7/2025	PJM requested a 6-month extension for planning and it is expected that the TPs will also request a 6-month extension for cost allocation

Non-RTO Southeast/SERTP	11/14/2024 – 5/14/2025	
SPP	10/28/2024 – 11/3/2025	On February 3, 2025, the SPP Regional State Committee voted to request a six-month extension of the Engagement Period.
Non-RTO West: Northern Grid	11/1/2024 – 5/1/2025	
Non-RTO West: WestConnect	10/28/2024 – 4/28/2025	
Non-RTO West: CREPC Transmission Collaborative		CREPC TC may combine efforts of NorthernGrid and WestConnect

ENGAGEMENT-PERIOD EXAMPLE STEPS

Step 1: Identify the RSEs in your planning region and ask if they want to participate in the Engagement Period;

Step 2: Once participating RSEs are identified, schedule a meeting to address the governance of the group:

- Vote Eligibility: Because each state may have more than one RSE participate in the Engagement Period, determine if:
 - Each state gets a single vote and its vote may be split, or
 - Each RSE gets a vote
- Leadership: Elect leadership based on majority vote
- Decision-making: Adopt a decision-making protocol (majority, 2/3, unanimous). (see O1920 ¶¶ 1360 & 1361)
- Attendance: Will proxies be allowed to attend and vote?
- Meetings: cadence and virtual and/or in-person
- Expert Assistance: will the RSEs hire experts?

Step 3: Develop a budget for meetings and experts and ask TPs to fund the work. (see O1920 ¶¶ 1354 & 1357)

Step 4: Start meeting ASAP to work toward deliverables (see below)

- Except for MISO, all Engagement Periods have already started.

ENGAGEMENT-PERIOD DELIVERABLES

The Engagement Period is a 6-month period (with a potential 6-month extension) held prior to compliance when the RSEs meet and may choose to run a number of processes or tasks, described in the table below.

Engagement Period Deliverables		
Deliverable	Notes	Order 1920/1920A Reference
1. Provide input to Transmission Providers on Cost Allocation	<i>Ex Ante</i> Method - RSEs to provide input Voluntary Funding Method - TPs must “consult and seek support from” RSEs when developing the Voluntary Funding Method	O1920 ¶ 1357 O1920 ¶ 1012
2. RSE-designed CA method	Create an RSE-designed <i>Ex Ante</i> method and propose it for adoption through the TPs on compliance	O1920A ¶¶ 629, 674
3. Design a State Agreement Process (SAP)	Design an SAP that is run after compliance	O1920 ¶ 1402
4. Input on process to address RSE requests	Provide input into the process that would be used if the RSEs request additional analysis or scenarios for purposes of CA	O1920A ¶ 367
5. Input on Evaluation Process and Selection Criteria of Facilities for Planning	a. TPs must “consult with and seek support from” the RSEs on the evaluation process including the selection criteria. b. TPs are “strongly encouraged” to consider any selection criteria support by the RSEs	O1920 ¶ 994 O1920A ¶ 459

Elements of a State Agreement Process (SAP) Proposal

On compliance, if RSEs adopt an SAP, the following key information must be included within the proposed tariff:

1. The event triggering the beginning of the SAP;
2. The duration of the SAP (not to exceed 6 months after Facility selection)
3. Which entities can participate in the SAP;
4. How the SAP will result in a cost allocation being filed;
5. What constitutes an agreement in that SAP;
6. How the agreement is communicated to the TPs;
7. Circumstances under which or the information necessary for TPs to file or to consider filing the State-Agreement Method;
8. Identify the Facilities to which the SAP applies. O1920 ¶¶ 1403, 1405, 1412, and 1416; FN 3013.