

**CENTRAL MAINE POWER COMPANY  
RESPONSE TO EXAMINER'S DATA REQUEST NO. 7  
DOCKET No. 2008-255**

October 23, 2008

**EX-07-35**

**Q.** "Petitioners expect that almost all of the MPRP will be designated PTF" (Volume I, Page 60, Line 10). Please describe what elements of MPRP might not be PTF, why and the potential cost impact.

**A.** The majority of the MPRP is for additions, modifications, reconstruction, or replacement of Pooled Transmission Facilities (PTF) and fall under the PTF definitions in the ISO-NE Open Access Transmission Tariff Schedule 12. Elements that will not be PTF include locations such as substations where non-PTF facilities are co-located with PTF facilities and will need to be replaced or moved to accommodate the new PTF lines or equipment. In addition, see the attached ISO-NE PP-4 for a discussion of additional considerations of what may be localized (non-PTF) such as costs introduced as a result of local or state regulatory or legislative requirements.

As part of the estimating process, the MPRP Team is identifying the non-PTF facilities that need to be replaced or moved. The current estimate for those replacements and relocations is summarized in the table below. As detailed engineering progresses, this number will be refined and updated. Given that MPRP has not yet applied for any local permits, or State and federal environmental permits, it is premature to predict the potential localized costs due to the other factors discussed in PP-4, such as local, state, and legislative requirements.

<b>Item No.</b>	<b>Description</b>	<b>Justification for non-PTF treatment</b>	<b>2008 Deterministic Estimated Cost, \$ in Millions</b>
1	Re-build portion of Section 175	34.5kV considered non-PTF	\$1.0
2	Re-rate sections 61A, 67A, 83B, 83C, 167A	Radial 115kV lines considered non-PTF	\$8.5*
3	Distribution Impacts (See EX-02-27)	Distribution facilities considered non-PTF	\$26.5**
<b>2008 Deterministic Estimated Cost of non-PTF</b>			<b>\$36.1</b>

\*Estimated cost to re-rate sections 61A, 67A, 83B, 83C and 167A is approximate. Detailed engineering is underway to evaluate the magnitude of scope required to increase the rating of these lines.

\*\*Estimated cost listed for distribution impacts includes those impacts known at this time. As detailed engineering continues additional impacts may be identified, however it is anticipated these impacts will be minor.

**Response Prepared and Submitted By:**

Steve Walker, PE  
POWER Engineers, Inc.

**Attachment(s):**

1. ISO-NE PP-4

**ISO NEW ENGLAND PLANNING PROCEDURE NO. 4**

**PROCEDURE FOR POOL-SUPPORTED PTF COST  
REVIEW**

**EFFECTIVE DATE: January 5, 2007**

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**Planning Procedure No. 4  
Procedure For Pool-Supported PTF Cost Review**

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## **Planning Procedure No. 4 Procedure for Pool-Supported PTF Cost Review<sup>1</sup>**

### 1.0 General

This procedure (“PP-4”) provides detailed guidance, pursuant to the ISO New England Transmission, Markets and Services Tariff (the “Tariff”), regarding the cost review of those necessary additions and modifications, reconstructions or replacements (referred to herein as “Projects”) of Pool Transmission Facilities (“PTF”) that are eligible for regional cost support: including Regional Benefit Upgrades (“RBUs”); RTEP02 Upgrades; plans requiring submittal for review under Section I.3.9 of the Tariff; and reconstruction/replacement of the PTF.

Under Section II.50 and Schedules 11 and 12 of Section II of the Tariff, ISO New England Inc. (“ISO”) with advisory input from the Reliability Committee (“RC”) will determine whether there are Localized Costs to be excluded from Pool-Supported PTF costs.

This PP-4 provides guidance on: what Projects are subject to cost review, what information the applicant for cost review (the “Applicant”) must provide to the ISO, the process for RC and ISO review of an Applicant’s Project, and the factors that will be considered in determining whether there are Localized Costs associated with a Project.

This Planning Procedure also provides guidelines for preparing a Transmission Cost Allocation (“TCA”) application (“TCA Application”) for use by the ISO and the RC. The Applicant must support the TCA Application with the necessary information and analysis of the Project. This procedure provides guidance on what information and analysis should be available and supplied to support a TCA Application. The completed form provided in Attachment B and all supporting materials describing and assessing the impact of the proposed plans together shall constitute submittal of a TCA Application.

Approval of a TCA Application allows an Applicant to include the approved costs associated with the Project, after the Project has been placed in service, into Pool-Supported PTF costs, subject to determinations made pursuant to this PP-4.

This PP-4 shall be effective upon the RTO Operations Date (the “Effective Date”).

This PP-4 shall be submitted to the review of the RC, at least annually, to evaluate the appropriateness of the minimum threshold set out in section 1.1.2 of this PP-4.

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<sup>1</sup> Capitalized terms used in this Procedure are intended to have the same meaning given to such terms in Sections I.2.2, II.1, and/or III.1.3 of the Tariff.

## 1.1 Projects Requiring a TCA Application

### 1.1.1. Categories of Projects requiring TCA Application

This procedure pertains to the cost allocation treatment of upgrades/additions/modifications to the PTF on and after the Effective Date. These upgrades/additions/modifications include the following: RBUs; RTEP02 Upgrades; plans requiring submittal for review under Section I.3.9 of the Tariff; or reconstruction/replacement of the PTF. These upgrades/additions/modifications to the PTF are referred to in this PP-4 as “Projects”.

TCA Applications are required for the following types of Projects that are seeking regional cost support: (1) an RBU as described in the annual Regional System Plan; (2) an RTEP02 Upgrade as described in the annual Regional System Plan; (3) one or more plans that otherwise require submittal for review under Tariff Section I.3.9 and that address the same system need; and (4) reconstruction/replacement of PTF that does not require approval under Tariff Section I.3.9 but that has a total estimated PTF portion of the Project cost greater than or equal to \$5 Million.

Although the Project may be projected over any time frame to demonstrate prudent planning, action on TCA Applications will only be taken on plans that reasonably are expected to be implemented within the next five (5) year period from the date of the TCA Application, unless engineering and construction lead times will take longer than five (5) years. In the case of longer lead times, an extension will be considered through the period of construction if the Project is initiated and completed within projected period of construction plus two (2) years originating from the date of the ISO action on the TCA Application.

Generally, an Applicant must file a single TCA Application for its Project. The ISO may, in the exercise of reasonable discretion, require multiple TCA Applications for individual pieces of a single Project.

### 1.1.2. Exemptions from TCA Application Requirements

If a Project does not require a TCA Application under Section 1.1.1 above, or if the total estimated PTF portion of the Project cost is less than \$1,000,000, then the Applicant need not file a TCA Application unless specifically requested to do so by the ISO.

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1.1.3. Grandfathering of Restated NEPOOL Agreement Section 15.5 Approvals

If a Project has received Restated NEPOOL Agreement Section 15.5 approval (“Section 15.5 approval”) prior to January 1, 2004 but was not in service as of that date, the Project shall be deemed to have no Localized Costs associated with the costs approved in the Section 15.5 approval; the Project shall, however, be subject to a review of its costs and a possible Localized Cost determination under Schedule 12C of Section II of the Tariff and this PP-4 if the Project's costs have exceeded or are anticipated to exceed 10% of the amount approved to be included in Pool-Supported PTF costs under the Section 15.5 approval or if there is a material change in the design of the Project.

1.1.4. Projects not subject to this Procedure

This Review Process does not pertain to:

1. Schedule 11 of Section II of the Tariff, Category C Generator Interconnection Related Upgrades (“GIRUs”), except to the extent such GIRUs may be eligible for regional cost support under the terms of Schedule 11
2. Elective Transmission Upgrades
3. Local Benefit Upgrades
4. Recovery of Localized Costs
5. Merchant Transmission Facilities or their interconnection

1.2 Review of Adequacy of TCA Application Documents

The complexity of proposed changes to the transmission system can range from minor changes to major alterations. The intent of the PP-4 process is to match information required as part of a TCA Application, to the review effort, and relative cost of the Project. Section 1.5 below provides guidance as to the level of information required in a TCA Application. The Applicant may request further guidance or preliminary review of Project-related information from the ISO and the RC prior to submitting a formal TCA Application.

1.3 Confidentiality

Should any documentation be submitted that is considered confidential, it is the responsibility of the Applicant to describe to the ISO, by name, the documents to be considered confidential. All information marked as confidential will be controlled in accordance with the ISO New England Information Policy.

1.4 Roles of RC and ISO in TCA Application Review Process

The RC or its designee will review the TCA Application and the RC will make a recommendation to the ISO as to whether there are Localized Costs associated with the Project that should not be supported as Pool-Supported PTF costs. The ISO will consider the RC's advisory recommendation in making its determination of whether there are Localized Costs associated with the Project that should not be included as Pool-Supported PTF costs.

1.5 Evaluation

Based on the total estimated PTF portion of the cost of the Project, four (4) categories of analysis are identified for supporting a particular Project (ranging from no analysis for exempt Projects to full costs analyses of transmission alternatives for Projects in excess of \$20 million). The ISO and/or the RC may also, however, request additional analyses. The analysis categories are summarized as follows:

**Table 1**

Category	Total Estimated PTF Portion of the Project Cost	Documentation Detail Required (in accordance with Section 1.6.1 of this PP-4) [Note: The ISO and/or RC may request additional information]	Recommended Timeline for Submission of TCA Application	RC Action	ISO Action
1	Less than \$1,000,000	TCA Application is not required.	None	None	None
2	Greater than or equal to \$1,000,000 but less than \$5 Million	<ul style="list-style-type: none"> <li>TCA Application &amp; Cover Letter (Ref. 1.6.1.a &amp; 1.6.1.b)</li> <li>Map and one-line diagrams (Ref. 1.6.1.d)</li> </ul>	30-days prior to a RC meeting for which action is expected.	Recommendation to the ISO	Written Findings and Determination
3	Greater than or equal to \$5 Million but less than \$20 Million	<ul style="list-style-type: none"> <li>TCA Application &amp; Cover Letter (Ref. 1.6.1.a &amp; 1.6.1.b)</li> <li>A description of the Project, including a detailed discussion of alternatives considered and reasons for choosing the particular design based on the factors outlined in Schedule 12C of Section II of the Tariff. (Ref. 1.6.1.c) Requirements from section 1.6.1.c.3.ii should focus on:                             <ul style="list-style-type: none"> <li>An overall cost estimate and categorized cost estimates for construction labor, materials, engineering and permitting.</li> <li>An overall cost estimate of each alternative.</li> </ul> </li> <li>Map and one-line diagrams (Ref. 1.6.1.d)</li> </ul>	60-days prior to a RC meeting for which action is expected.	Recommendation to the ISO	Written Findings and Determination
4	Greater than or equal to \$20 Million	<ul style="list-style-type: none"> <li>TCA Application &amp; Cover Letter (Ref. 1.6.1.a &amp; 1.6.1.b)</li> <li>A description of the Project, including a detailed discussion of alternatives considered and reasons for choosing the particular design based on the factors outlined in Schedule 12C of Section II of the Tariff. (Ref. 1.6.1.c) Requirements from section 1.6.1.c.3.ii should focus on:                             <ul style="list-style-type: none"> <li>An overall cost estimate and a detailed description of the categorized cost estimates for construction labor, materials, engineering and permitting.</li> <li>An overall cost estimate of each alternative; the ISO may request a detailed description of the categorized cost estimates for construction labor, materials, engineering and permitting of each alternative.</li> </ul> </li> <li>Map and one-line diagrams (Ref. 1.6.1.d)</li> </ul>	90-days prior to a RC meeting for which action is expected.	Recommendation to the ISO	Written Findings and Determination

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1.6 Submittal of TCA Application

TCA Applications will be submitted via e-mail to the ISO (as detailed in Attachment C) and shall be submitted per the described timelines in Section 1.5 above, and the guidelines within this section and Section 2.0 below, in order to provide the RC sufficient time to review the TCA Application before the requested action date. The timelines provided in this PP-4 are intended to provide guidance to the Applicant, the RC and the ISO but do not bind the Applicant, the RC or the ISO to take any action.

1.6.1 Review

An Applicant is encouraged to discuss their TCA Application and supporting documentation with the ISO to ensure completeness prior to submittal for review.

A completed TCA Application, and supporting documentation, shall be submitted electronically to the ISO, who will collect, distribute, and provide a permanent record of the TCA Application.

Upon receipt of a TCA Application, the ISO will notify the Applicant if the submitted TCA Application is incomplete or additional information is required.

A typical TCA Application will include the following:

- (a) Cover Letter (including when action by the RC is requested by)
- (b) TCA Application (as detailed in Attachment B)
- (c) Additional details and supporting documentation pertaining to:
  - 1) A review and discussion of the need for the proposed Project.
    - Note: To the extent that the needs analysis was conducted during the annual planning process (*i.e.*, the “Regional Transmission Expansion Plan” (“RTEP”) or “Regional System Plan” (“RSP”), whichever is appropriate), a summary of that analysis may be considered sufficient.
  - 2) A summary of the technical analysis performed for the Project and the identified transmission alternatives.
  - 3) A discussion of why the Project was selected over other transmission alternatives, with a description of the benefits of the proposed Project over other transmission alternatives from an operational, timing of implementation, cost and reliability perspective.
    - (i) The proposed Project, and any feasible and practical transmission alternatives that were

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considered, including those offered in the most recent RTEP report or RSP report, whichever is appropriate.

- Note: A feasible and practical transmission alternative means a transmission alternative that is feasible and practical from an engineering design and construction perspective. An alternative that is not or may not be approved by a siting or local review board may still be considered a feasible and practical transmission alternative;
  - (ii) The most currently available cost estimates<sup>2</sup> of building the Project and if required, transmission alternatives that were considered, including overall costs and categorized costs for construction labor, materials, engineering and permitting;
  - (iii) A comparison of the potential operational impacts on the bulk power system during construction of the Project with any feasible and practical transmission alternatives that were considered;
  - (iv) A comparison of the potential operating costs of the Project and any feasible and practical transmission alternatives that were considered; and
  - (v) Design considerations affecting maintenance, construction and/or future expansion of the Project.
- (d) One-line diagrams and a map locating the facilities<sup>3</sup>.
- (e) Any additional relevant information requested by the ISO or the RC.

The Applicant has an ongoing responsibility to update any TCA Application when additional information relevant to review of the TCA Application becomes available prior to RC review and issuance of the ISO's written findings and determination.

### 1.6.2 Considerations

In making its determination of whether Localized Costs exist, the ISO, with advisory input from the RC, will consider the reasonableness of the proposed design and construction method with respect to:

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<sup>2</sup> All dollar amounts should be based on the same Valuation Year.

<sup>3</sup> If these documents were already submitted to the ISO as part of a Proposed Plan Application, they do not need to be re-submitted.

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

Attachment A provides examples of relevant considerations for determination of Localized Costs.

### 1.6.3 Additional Costs Due to Regulatory or Public Requirements

The Applicant shall identify in their TCA Application any significant additional proposed Pool-Supported PTF costs introduced as a result of local or state regulatory and/or legislative requirements. The ISO will then determine, with the advice of the RC, whether these incremental costs resulting from the requirements of any local or state regulatory and/or legislative requirements will be identified as Localized Costs.

## 1.7 Time Guidelines

Applicants are urged to supply appropriate data, with adequate lead times for anticipated review as described in Sections 1.5 and 1.6 above. Failure to follow these timeframes may result in a delay of review of the TCA Application.

## 1.8 Actions on a TCA Application

On each TCA Application, the RC will provide a recommendation and suggested motion describing the conditions of the approval for the TCA Application. (Such motion should be distributed consistent with the Bylaws that apply to the RC). Any such recommendations will be distributed with the meeting material and agenda to the extent practicable.

If in reviewing the TCA Application, the RC decides additional information, review, or study is required prior to acting on the Application, the RC may elect to defer action and solicit supplementary information, review, or study as required.

Therefore, the RC may defer action, recommend approval of the TCA Application by the ISO, or recommend a determination of Localized Costs by the ISO.

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In accordance with the Participants Agreement, the Secretary of the RC will notify the Members and Alternates of the Participants Committee and the ISO of the actions taken by the RC. This written notice will be delivered prior to the end of the fifth (5<sup>th</sup>) business day following a meeting of the RC. This notification will constitute formal confirmation that such action was taken.

If the Applicant seeks input by the Participants Committee, it may request TCA Application review after the RC meeting but before the fifth (5<sup>th</sup>) business day following a meeting of the RC. The request should be submitted in writing to the Secretary of the RC with a copy sent to the ISO by the Applicant.

The ISO will consider the recommendations of the RC, and the Participants Committee as appropriate, in the process of making a determination on each TCA Application. The ISO may also seek additional information after RC or Participants Committee action and prior to making its decision. The ISO will transmit, in a timely manner, its written findings and determination to the Applicant (with copy to the RC) stating its decision, and the basis for its decision.

If the Applicant disagrees with the ISO's written findings and determination, the dispute resolution procedures outlined in Section 1.11 below and Schedule 12C of Section II of the Tariff should be followed.

#### 1.9 Withdrawal of a TCA Application

Should an Applicant wish to withdraw its TCA Application, it should send a letter to that effect to the ISO (as detailed in Attachment C). The ISO will distribute the notice of withdrawal to the RC.

In cases where a Proposed Plan Application was not required, but a TCA Application was submitted, the ISO issued a written findings and determination and the Project was cancelled, the TCA Applicant must provide written notification to ISO within 60-days of such cancellation, requesting withdrawal of the approved TCA Application. Conversely, in cases where a Proposed Plan Application was submitted, and a TCA Application was submitted, the ISO issued a written findings and determination and the Project was cancelled, the TCA Application will automatically be withdrawn upon notification of withdrawal of the Proposed Plan Application. However, the Applicant may submit a TCA Application for costs incurred prior to cancellation of the Project.

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1.10 Reviews and Update of Approved TCA Applications

The RC and the ISO will review an updated TCA Application for the proposed Project, as provided for below. The ISO, after considering the advice of the RC, may require that the Applicant resubmit its TCA Application.

The Applicant is responsible to inform the ISO of any significant additional Pool-Supported PTF costs or any material changes in the design associated with a proposed Project made subsequent to approval of the TCA Application. Such information may be delivered to the ISO by submitting a revised TCA Application, including the reasons for resubmission. Specifically, an Applicant, which has already received approval of its original TCA Application, must notify both the RC and the ISO if either: (i) costs have exceeded or are anticipated to exceed 10% of the amount determined by the ISO to be included in Pool-Supported PTF costs; or (ii) there is a material change in design of the Project. If an Applicant fails to notify the ISO of either of these developments, and it is discovered during the course of a Regional Network Service (“RNS”) Audit, then the additional costs associated with such development will be excluded from the Pool-Supported PTF until the process described in this Procedure has been followed and the ISO accepts the costs following appropriate review by the RC and the ISO. In such instance, the costs shall be recovered only prospectively pursuant to the Tariff.

1.11 Dispute Resolution

Should the Applicant disagree with the ISO’s written findings and determination as described in Section 1.8 above, a dispute may be filed.

Disputes should be submitted in writing first to the ISO (as detailed in Attachment C). They should describe in detail the basis for challenging the ISO’s written findings and determination, and must be submitted within 60 days of receipt of the ISO’s written findings and determination. The ISO will then enter into good faith negotiations for a period not to exceed 60 days from the date of the Applicant’s written notice to try to resolve the dispute. If there is no resolution of the dispute at the end of the negotiation period, the Applicant may file a complaint. The ISO shall notify the RC of the outcome of the dispute resolution process.

2.0 TCA Application Forms

2.1. Summary Statement

The form in Attachment B must be submitted with each TCA Application as outlined in Section 1.6 above. Supporting documentation should supplement the form as appropriate.

2.2 TCA Application Identification

Application Number (Company - Year (2 digits) – TCA– Unique ID  
(Sequential Application #s) – Rev #

e.g. CMP-04-TCA-01  
CMP-04-TCA-02  
CMP-04-TCA-01-Rev 1

3.0 Attachment C – ISO Correspondence

The ISO may, per this Procedure, update Attachment C in regard to the mechanisms for exchange of correspondence, without approval. The ISO will notify the RC when such a change has been made.

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**Document History**<sup>4</sup>

Rev. 0 App.: 4/17/98

Rev. 1 Rec.: RC – 5/19/04; Eff.: PC – 6/11/04

Rev. 2 Eff: 2/1/05

Rev. 3 Rec.: RC – 12/6/06; Eff.: PC – 1/5/07

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<sup>4</sup> This Document History documents action taken on the equivalent NEPOOL/ISO New England Procedure prior to the RTO Operations Date as well as revisions to the ISO New England Procedure subsequent to the RTO Operations Date.

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**Attachment A**  
**Supplemental Guidelines for Pool-Supported PTF Cost Review**

In determining whether there are Localized Costs, the ISO will consider as appropriate and with the advisory input of the RC, the following non-exclusive list of factors:

- Costs of construction including all costs associated with rights of way, easements and associated real estate.
- Assessment of the schedule or in-service date of the Project from an engineering and construction standpoint rather than from the standpoint of potential delays in local or state siting.
- Relative reliability and operational impacts of the Project as compared to alternatives considered.
- Costs associated with operation and maintenance of the proposed design and alternatives, including consideration of whether the proposed design is consistent with Good Utility Practice.
- Costs of related and long-term congestion impacts, if any, of each proposed PTF and Non-PTF design alternative, including costs related to outages associated with construction.
- The proposed design's fit into reasonable future expansion plans including the "Regional Transmission Expansion Plan" ("RTEP") or "Regional System Plan" ("RSP"), whichever is appropriate.
- Consistency with current engineering, design and construction practices in the area.

The following, non-exclusive list of examples is provided for illustration of the types of Projects that would be considered to contain Localized Costs:

1. The Project costs more than a feasible or practical transmission alternative and has equal or less robust bulk power system performance than the transmission alternative.
2. The Project does not address a bulk power system need.
3. The Project includes underground transmission cable, which is selected (a) at the direction of a local or state siting board, or (b) to address other local concerns, and the cost of overhead transmission lines is less expensive, taking into account all relevant costs.
4. The Project is a gas-insulated or covered substation when an open-air substation would be feasible and practical for lower cost.

The following, non-exclusive list of examples is provided for illustration of the types of Projects that are not likely to contain Localized Costs.

1. The Project includes underground transmission cable but the total cost of the underground transmission cable Project is lower than a feasible and practical overhead transmission line, the operating and maintenance costs are

comparable, and the reliability benefits provided by the underground cable are equal to those provided by the overhead line.

2. The Project has higher total cost than feasible and practical transmission alternatives, but provides for more robust bulk power system performance consistent with the RSP planning horizon and predicted load growth, than such transmission alternatives.

**Attachment B**  
**TCA Application Form**

**Project Name:**

1. Applicant: Name Address  Phone # Email Address	Application #: If revision to a prior Application, please attach a copy of the prior Application. The revision was required because of: <input type="checkbox"/> a material change in design <input type="checkbox"/> a cost increase greater than 10%	Date:
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2. <u>Project Description:</u>  a. Summary of PTF-related work for Project:  b. Summary of Non-PTF-related work for Project:	<u>In Service Date:</u>
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3. Was a transmission Proposed Plan Application required for this work?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
4. Has a transmission Proposed Plan Application been approved? If yes, attach a copy and reference Proposed Plan Application # and approval date.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/> Approval Date:

**Need For Project:**

5. Need Based On	<b>Yes</b>	<b>No</b>	
a. Reliability	<input type="checkbox"/>	<input type="checkbox"/>	
b. Economic	<input type="checkbox"/>	<input type="checkbox"/>	
c. Service to new load	<input type="checkbox"/>	<input type="checkbox"/>	
d. New generator interconnection	<input type="checkbox"/>	<input type="checkbox"/>	
If yes, Category of Generator (See Schedule 11 of Section II of the Tariff):	'A' <input type="checkbox"/>	'B' <input type="checkbox"/>	'C' <input type="checkbox"/>
Generator Proposed Plan Application Number			
Generator Proposed Plan Application Date			
(Attach copy of cover letter & Generator Proposed Plan Application)			
e. Other (specify in line 6)	<input type="checkbox"/>	<input type="checkbox"/>	

6. Provide a narrative description of the need for this Project. (Include available documentation relative to the need for this Project. If this is a revision to a previously submitted TCA application explain the cost and/or material change difference here)	
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**Cost of Project:**

	Original Application	Revision to prior Application
7. Total Proposed PTF Cost of this Project:	\$	\$
a. Requested PTF Costs associated with this Project:	\$	\$
b. Generator Supported PTF Costs*:	\$	\$
If the costs in 7.a. plus 7.b. do not equal the total PTF cost, please explain and indicate who is responsible for the remaining costs.		
8. Costs introduced as a result of local, state or other regulatory/legislative requirements, including costs identified pursuant to Section 1.6.3 of this PP-4.	\$	\$
9. Total Non-PTF Cost associated with this Project (if any)	\$	\$

10. Total PTF Cost based on: (check one)
Actual Costs <input type="checkbox"/>
<b>OR</b>
Estimated Costs* <input type="checkbox"/>
11. Valuation Year of dollar amounts submitted above:

12. Provide a breakdown of the total costs consistent with Table 1. If applicable, explain how the cost of common facilities was allocated between PTF and Non-PTF.
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13. Does this Project result in a change of existing Non-PTF facilities to PTF? Yes <input type="checkbox"/> No <input type="checkbox"/>
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14. Describe the major transmission alternatives that were considered and why the preferred alternative was selected. (Include available documentation relative to the major transmission alternatives analysis and selection.)
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\* Pool-Supported PTF costs were determined pursuant to Schedule 11 of Section II of the Tariff.

**Attachment C**  
**ISO Correspondence**

**TCA Applications:**

TCA Applications should be submitted via e-mail to

**TCApps@iso-ne.com**

**TCA Application Withdrawals:**

TCA Application Withdrawals should be submitted in writing to

**ISO New England,  
Vice President, System Planning  
One Sullivan Road,  
Holyoke, MA 01040-2841**

**Disputes:**

Disputes should be submitted in writing to

**ISO New England,  
Vice President, System Planning  
One Sullivan Road,  
Holyoke, MA 01040-2841**