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Mr. David Meyer
U.S. Department of Energy
Office of Electricity Delivery and Energy
Reliability
1000 Independence Avenue, SW
Washington, DC 20585

Re: Comments of Southern Company Services, Inc.
On DOE's 2009 Transmission Congestion Study

Dear Mr. Meyer:

Southern Company Services, Inc., as agent for Alabama Power Company, Georgia Power Company, Gulf Power Company and Mississippi Power Company (collectively, "Southern Companies"), appreciates this opportunity to provide these comments to the Department of Energy's ("DOE") 2009 Transmission Congestion Study ("2009 Study" or "Study"). Southern Companies have long-supported DOE's efforts in preparing such studies in fulfillment of DOE's statutory requirements under Section 216 of the Federal Power Act ("FPA"), 16 U.S.C. § 824p. To this end, Southern Companies note their participation in DOE's development of the 2009 Study, including having sponsored speakers at DOE's workshops and technical conferences and provided written comments. In an effort to improve DOE's analyses and conclusions underlying the 2009 Study, as well as to facilitate DOE's preparation of future congestion studies, Southern Companies provide the following comments.

The 2009 Study Accurately Concluded that the Southeast Experiences "Little Congestion."

The 2009 Study requests comments regarding the accuracy of its congestion analysis. *See* 2009 Study, at 101. In response, Southern Companies agree with the Study's major congestion-related conclusions regarding the Southeast and SERC (in which Southern Companies provide electric service). Southern Companies particularly agree with DOE's conclusions regarding the following:

- <u>The Southeast Has Little Congestion</u>: The Study found that the "SERC region has a unique philosophy with respect to electric system planning and construction" in that "'[t]he transmission system within SERC has been planned, designed and is operated such that the utilities' generating resources with firm contracts to serve load are not

constrained.'" 2009 Study at 60 (quoting NERC (2009a) (*2009 Summer Reliability Assessment*, at http://www.nerc.com/files/summer2009.pdf, p.131). "Because the southeastern utilities build aggressively in advance of load, there is little economic or reliability congestion within the region." 2009 Study, at 61. These findings and conclusions by DOE regarding the Southeast are correct, as demonstrated by the panelists' discussions at DOE's July 28, 2009 workshop held in Atlanta, Georgia. In fact, those discussions were so unanimous regarding the lack of transmission congestion in this region that it led Mr. David Meyer of DOE to inquire into why the Southeast has been so successful in avoiding transmission congestion compared to other regions. *See* Pre-Congestion Study Regional Workshop for the 2009 National Electric Congestion Study, Atlanta, Georgia, Transcript at 18 (July 29, 2008) ("[W]hy is your process working … as compared to other areas?").[1] Southern Companies note that prospectively, this region should continue to be characterized by a lack of congestion because the SERC utilities continue to invest significant amounts in transmission so that the generation in this region that is backed by firm transmission commitments can be delivered to load without constraint. Indeed, as stated by NERC in its recently released 2010 Summer Reliability Assessment, SERC members invested approximately $1.9 billion in new transmission lines and system upgrades 100 kV and above in 2009 and plan to spend approximately $2.4 billion in 2010 and approximately $2.3 billion in 2011.[2]

- The Addition of New Nuclear Resources Should Not Result in Significant Congestion: The transmission congestion study prepared by DOE in 2006 concluded that the Southeast was a "Conditional Congestion Area" due to the planned development of a significant amount of new nuclear capacity in the region. The 2009 Study removed this characterization, concluding (among other things) that "the pending nuclear projects have been proposed by sponsors that plan to secure the needed transmission to interconnect the generator to the grid...." 2009 Study, at 64. This conclusion, and the removal of the identification of the Southeast as such a Conditional Congestion Area, is correct. Southern Companies and several other utilities in Georgia are leading the nation in developing the first new nuclear development in the United States in thirty (30) years with their planned additions to Plant Vogtle. Transmission additions to deliver the output of these units to load without economic or reliability congestion are included in the current transmission expansion plan and have been approved by the Georgia Public Service Commission.

[1] This transcript is available at: http://congestion09.anl.gov/documents/docs/Transcript_Pre_2009_Congestion_Study_Atlanta.pdf.

[2] NERC 2010 Summer Reliability Assessment, at 90-91 ("Summer 2010 Assessment").

DOE Appropriately Used an Open Process in Developing the 2009 Study, with the 2009 Study Incorporating Input from Industry Experts in the Southeast.

A primary contributor to the accuracy of the 2009 Study (at least with regard to the Southeast) is that DOE actively sought and considered input from industry experts. DOE conducted multiple conferences and regional workshops, as well as invited comments, in developing the 2009 Study. Given the positive impact that this inclusive process yielded (at least for the Southeast) in the 2009 Study, Southern Companies urge DOE to retain this approach in preparing its future congestion studies.

Making Significant Amounts of Additional Pricing and Market Information Publicly Available Would Have Anticompetitive Effects that Would Exceed Any Benefits that Might be Realized.

The 2009 Study states that "[m]ore systemic and consistent data are needed on several transmission subjects" and that DOE "looks forward to being able to draw upon … improved data ... in its 2012 Congestion Study." 2009 Study, at xv. The 2009 Study articulates a desire for more of the following types of information:

1. The prices and quantities of short- and long-term transactions in wholesale electricity markets.
2. Scheduled and actual flows on the bulk power system.
3. The economic value of curtailed transactions.

2009 Study at xv, 103. The 2009 Study states that the prevalence of such data is needed "to facilitate better and more transparent planning and policy decisions.…" 2009 Study, at 103.

In response, and as previously discussed, DOE reached the correct conclusion regarding the lack of congestion in the Southeast. While Southern Companies express no opinion regarding the other regions of the country, Southern Companies note that DOE generally indicated that it had less types of information concerning the Southeast compared to many other regions,[3] yet DOE reached the correct conclusion regarding congestion in the Southeast. These considerations strongly indicate that DOE currently has more than enough data to comply with its statutory duties under FPA Section 216. Furthermore, and as discussed in the next section of these comments, Southern Companies are somewhat concerned that DOE may not have analyzed all of the publicly available data that is accessible on these subject matters.

Even more importantly, making significantly more market information publicly available would not be an appropriate course because it would harm the markets. Information such as Locational Marginal Pricing ("LMP")/shadow pricing data does not exist in bilateral markets (such as the Southeast). Should DOE or other entities try to replicate the equivalent of such data/metrics by making significantly more generation and market information publicly available,

[3] Reference is made to Tables 2-1 and 4-1 on pages 9 and 33, respectively, of the Study.

then Southern Companies are concerned that the type of data sought could eventually encompass, for example, highly competitive economic and resource-specific data. Making such information publicly available would harm both the competitive wholesale markets and consumers (who would pay higher prices) by allowing competitors to engage in predatory pricing rather than truly competitive pricing.

To illustrate the potentially anti-competitive effects of requiring the disclosure of such data, reference is made to, for example, the Midwest Independent System Operator's ("MISO") Attachment FF provision regarding confidential data. This provision states, in pertinent part:

> Confidential information related to economic (*e.g.*, congestion) studies … is clearly sensitive information which must remain confidential. The Transmission Provider shall use generic, publicly available, cost information from industry sources in the economic studies to prevent the accidental release of confidential information. This approach will promote an open planning process because the results of economic studies are available to all interested parties.[4]

Southern Companies also disagree with the implication that making significantly more market, pricing, and transmission information publicly available will "facilitate better and more transparent planning and policy decisions". As established by the 2009 Congestion Study, the Southeast already has a robust transmission system. Making significantly more information publicly available will not result in significant improvements; rather, it would cause competitive harm.

Publicly Available Data that DOE May Not Have Considered.

As discussed above, DOE has more than enough information to fulfill its statutory duties under FPA Section 216, as demonstrated by its conclusions reached concerning the Southeast, and requiring significantly more market and flow data be made public would harm consumers. In addition, Southern Companies are somewhat concerned that DOE may not have considered all of the publicly available information that is already accessible.[5] In this regard, at both DOE's July 29, 2008 workshop held in Atlanta and in Southern Companies' October 15, 2008 comments filed with DOE, as well as at the DOE technical conference held in Chicago, Illinois on March 25-26, 2008, Southern Companies discussed numerous transmission-related, publicly-

[4] *See* MISO OATT, Attachment FF, § I.A.12; *see also Midwest Independent System Operator, Inc.*, 123 FERC ¶ 61,164, P 35 (accepting for filing this aspect of MISO's Attachment K). In addition, a federal requirement to mandate the disclosure of competitive confidential information could, depending on the circumstances, result in an uncompensated taking of property in violation of the Fifth Amendment of the United States Constitution, as well as in a violation of the Trade Secrets Act (18 U.S.C. § 1905).

[5] Southern Companies recognize that this concern might be misplaced - - DOE may have considered the following. Southern Companies are bringing these materials to DOE's attention in an effort to facilitate DOE's performance of these congestion studies.

available information sources that DOE could pursue to develop the congestion studies required by FPA Section 216. For example, in Southern Companies' October 15, 2008 comments filed with DOE, Southern Companies explained:

> As noted by Mr. Carlsen at the Atlanta workshop, there are a number of informational sources that DOE should consider consulting as it prepares its 2009 study. Among these are the Form EIA-411 Coordinated Bulk Power Supply Program Reports, which contain regional information on loads and transmission resource data, and Transmission Loading Relief ("TLR") logs, which are available on NERC's website and reflect possible instances of real-time congestion occurring over the transmission system. Of particular use to DOE in its assessment of the extent to which a particular area experiences significant or material amounts of transmission congestion would be logged TLR events of level 5 and above. DOE also may find useful the regional near- and long-term studies and assessments performed under the auspices of both SERC and the Eastern Interconnection Reliability Assessment Group ("ERAG"). In addition, Southern Companies note that FERC requires each regulated transmission provider to post on its OASIS a list of its transmission studies, and these studies can also provide valuable insight regarding the nature of the transmission grid.[6]

Schedule Information Available on Southern Companies' OASIS

Since the Study specifically requests additional information concerning scheduled and actual flow information and market pricing information, the following discusses publicly available sources of relevant information.

The Study states at Tables 2-1 and 4-1[7] that transmission schedule and flow information are not available for SERC (with regard to Table 2-1) and for Southern Companies specifically (with regard to Table 4-1). These characterizations (at least as applied to Southern Companies) are not correct. Southern Companies' OASIS provides the schedule information for the uses of Southern Companies' transmission system at the "scheduledetail" template. This information is available in read-only format to everyone who has an OASIS ID, with there being no charge to receive such an ID from Southern Companies.

[6] Comments of Southern Company Services, Inc. on the Department of Energy's 2009 Transmission Congestion Study, at 6 (October 15, 2008).

[7] 2009 Study, at 9, 33 (respectively).

Transmission-Related Data Available at NERC's Central Repository

In addition, there is a tremendous amount of transmission information available at NERC's Central Repository for Security Events, which is available at NERC's website at https://crc.nerc.net/ once one obtains a NERC password (which, we understand, may be readily obtained). The following types of information are available:

- Current CRC Events – Shows:
  - CRC Event ID
  - Facility Name (Flowgate Name)
  - Facility ID (Flowgate Number)
  - Level (TLR Level)
  - Marginal Bucket
  - Initiating Party
  - Direction
  - Responsible Party (RC Issuing TLR)
  - Effective Time (CST)
- Event Postings – Shows:
  - Facility ID (Flowgate Number)
  - Facility Name (Flowgate Name)
  - Procedure Name
  - Level (TLR Level)
  - Initiating Party
  - Direction
  - Responsible Party (RC Issuing TLR)
  - Effective Time (CST)
- Search/Log:
  - Allows for Query of CRC Event Database
- Past CRC Events:
  - Allows for Query of TLR Log
- System Flows – Shows:
  - ID (Flowgate Number)
  - Flowgate (Flowgate Name)
  - Monitored Element Actual MW
  - Monitored Element Post Contingency MW
  - Monitored Element Limit MW
  - Contingent Element Actual MW
  - Contingent Element LODF (Line Outage Distribution Factor)
- EEA's (Energy Emergency Alert) – Shows:
  - Message Subject
  - Level
  - Sender

    - Date/Time (CST)
- GSF (Generation Shift Factors) Viewer
- TDF (Transfer Distribution Factors) Viewer
- Site Links – Shows Links to:
    - Book of Flowgates
    - Reference Base Cases
    - Energy Emergency Alert Logs (Level 3 Reports)
    - E-Tagging Files
    - TDF Factors Viewer
    - CIPAG (Threat Levels) – Critical Infrastructure Protection Advisory Group
- TLR Final Reports – Shows:
    - Rolling 12 Month Archive of TLR Final Reports
- Downloads – Provided in CSV and XML Formats:
    - Flowgate Data
    - Current CRC Event Data
    - CRC Events in Progress
- 10000 Flowgates – Temporary Flowgates – Lists:
    - The last 30 days of temporary flowgate messages

Federal Energy Regulatory Commission Information

FERC Electric Quarterly Reports (EQRs): FERC jurisdictional entities are required to submit (on a quarterly basis) transaction information related to all short-term and long-term transactions. These submittals include price and quantity information for each wholesale power sale transaction for entities subject to FERC's jurisdiction. This data is publicly available at www.ferc.gov.

FERC Form 1 and Form 1F: On an annual basis, major and non-major electric utilities are required to file the FERC Form 1 and Form 1F, respectively, which includes significant amounts of information on wholesale sales and purchases (including price and quantity), as well as installed capacity, plant type, etc.

FERC Form 714: This report provides hourly scheduled and actual interchange information for each Balancing Authority, as well as hourly system lambda and hourly demand.

Other FERC Filings and Reports: Additional power sale transaction data is also available through other FERC filings (*e.g.*, market-based rate triennial filings, Form 566 (List of 20 Largest Retail Customers), etc.) and FERC's periodic market and reliability assessments.

Department of Energy / Energy Information Administration

DOE Electric Power Flash Report: This monthly report provides an estimate of the total power generation in the United States based on historical trends.

DOE Electric Power Monthly Report: This monthly report includes information on retail sales and revenues (including existing and planned generation).

DOE Electric Power Annual Report: This annual report includes information on wholesale power sales and purchases and retail sales (including existing and planned generation).

EIA-923 (formerly FERC Form 423) – This form provides fuel cost and Btu (heat) content of fuels delivered to each power plant.

Available Market Data: Market data is also available through private sources such as Platts and SNL Energy.

Southern Companies Disagree with Some of the 2009 Study's Conclusions Regarding Renewable Energy Development and Transmission Availability.

Again, Southern Companies concur with the bulk of the 2009 Study's findings with regard to its congestion analysis in the Southeast. However, Southern Companies do not agree with all of the 2009 Study conclusions regarding the nexus between renewable energy development and transmission availability. In general, the 2009 Study concludes that several transmission planning, cost allocation, and siting issues are "frequently a major obstacle to the development of large scale renewable energy projects." *See* 2009 Study, at 14, 24-25. Southern Companies disagree with the overall negative implication concerning transmission in the context of renewable development. The main obstacle to the development of large scale renewable projects (particularly for remotely located wind) is not transmission planning, cost allocation, or siting; rather, it is that total costs (including transmission integration costs) for such renewable projects have not proven to be economic as compared to other options.[8] For example, a recent article noted that the development of wind was "threatened" because of "regulators' reluctance to let utilities sign on to above-market deals". *Electric Utility Week*, "US wind power expansion may be hindered by low gas prices, regulatory 'backlash'" (April 12, 2010). Of course, if the arrangements were not above market, one would assume that they would not face such opposition.

Southern Companies particularly disagree that transmission planning is an obstacle to the integration of renewables, as the current transmission planning processes can readily perform the necessary transmission plans for whatever resources that have firm transmission commitments.

[8] The economics of the projects (*i.e.*, benefits relative to costs) have not resulted in entities committing to fund those projects.

On cost allocation, Southern Companies are concerned that those advocating for major cost allocation reform in the name of renewables often seek to unfairly subsidize remotely-located resources through the broad socialization of the transmission costs to integrate such remotely-located resources. On transmission siting, Southern Companies note that while they operate over a wide geographic expanse covering several states, they have not encountered significant siting difficulties, even for lines that cross state borders.

Importantly, while some might argue that the transmission upgrades needed to integrate renewables are currently not economic due to externality factors, those issues are being addressed by renewable portfolio standards ("RPS") requirements and carbon ceiling efforts. As explained by Commissioner Paul J. Hibbard of the Massachusetts Department of Public Utilities at the FERC technical conference held on September 21, 2009 in Philadelphia in FERC Docket No. AD09-8, implementing additional regulatory measures (beyond such RPS and carbon-capping efforts), such as imposing a broad cost socialization, in the name of integrating distant renewables would be inefficient and would harm consumers by favoring such remotely located resources over more economical, locally available green alternatives (*e.g.*, demand-side management resources and locally available wind, solar, and biomass alternatives).[9]

There are also several statements in the Study indicating that renewables will not be developed unless the transmission is already in place. *See* 2009 Study at 25 (asserting that there is a "chicken and egg" problem regarding renewables and transmission and stating "remote renewables cannot be developed unless the transmission is there to serve them"). Southern Companies strongly disagree that renewables need preferential treatment over other types of generation by having the transmission first built (and apparently paid for by others) before the development of the renewable generation. Principles of least-cost planning, which are utilized in the Southeast, require that the total costs of delivered power should be analyzed in making resource addition decisions, and bifurcating the transmission and generation analysis would be inefficient, fail to provide appropriate price signals, and lead to higher costs to consumers.[10]

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[9] It also bears noting that transmission expansion is only one of many factors considered in evaluating resource options. Reliability, operational and market issues, and economic factors are all key decisional elements that cannot be addressed solely through developing workable power flow solutions (*i.e.*, through transmission expansion alone). A resource's limiting factors also have to be considered, such as its ramping and regulation requirements, reserve requirements, bottom-out conditions, system restoration factors, basis risk in LMP markets, etc.

[10] Reference to the origins of Alabama Power (one of the Southern Companies) demonstrates that this "chicken and egg" reference is misplaced. Alabama Power was originally formed largely to integrate a type of remotely located generation resource (hydroelectric power) to serve the State's major load centers. At the time of the original development, there was neither generation nor transmission infrastructure, and hence an even more pronounced "chicken and egg" issue was presented. Nevertheless, the forbearers to Alabama Power were able to convince investors that the development of both the hydroelectric and transmission assets to integrate such generation was economical, and the development of both occurred. Should remotely located renewables demonstrate that they are economic alternatives, they will also be similarly developed.

Demand Response, Smart Grid, Energy Efficiency, and Related Achievements in the Southeast.

While the 2009 Study cites the demand response, Smart Grid, energy efficiency, and related achievements in New England,[11] California,[12] the Mid-Atlantic region,[13] New York[14] and Arizona,[15] the Study does not recognize similar achievements in the Southeast. While this is an understandable result (in that the Southeast was found to be relatively unique in that it could demonstrate a lack of congestion without having to make reference to such non-transmission alternatives), for purposes of a complete record, Southern Companies emphasize that they, along with other Southeastern utilities, have actively developed (and continue to aggressively develop) such programs.

While much could be said in this regard, Southern Companies point to a few market assessments performed by FERC Staff. For example, in a 2008 press release, FERC noted that Alabama was one of two states that "led states in approving time-based rates for consumers."[16] In addition, Mr. Charles Whitmore of FERC's Office of Enforcement provided a presentation to FERC in 2008 in which he noted, "Georgia Power developed the real-time pricing program that I mentioned earlier this year in our State of the Markets Report – one of the most successful real-time pricing programs in the country."[17] The cited 2007 State of the Markets Report provides,

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[11] *See* Study, at p. 53 ("New England has achieved impressive growth in demand response resources . . ."). *See also id.* at pp. 56-7 ("achievement on several fronts . . . aggressive demand response programs . . .").

[12] *See id.*, at p. 78 ("California has long been a leader in energy efficiency and demand response). *See also id.* at p. 86 ("Southern California . . . growing demand response and smart grid capabilities"); s*ee also id.*, at p. 87 ("Since 2005, California has been offering more demand response programs; PG&E has been aggressively rolling out advanced meters to its customers since 2007 . . .").

[13] *See id.*, at p. 40 ("recent developments in the Mid-Atlantic region, including notable changes in load, energy efficiency, demand response, and distributed generation . . ."); *see also id.*, at p. 51 ("The region is making significant progress in reducing loads and improving reliability through the use of aggressive energy efficiency and demand response programs.").

[14] *See id.*, at p. 41 ("To facilitate more effective demand response and customer energy efficiency choices, most of the New York utilities are installing advanced metering systems designed to deliver transparent, market-based prices to all consumers.")

[15] *See id.*, at p. 94 ("[T]he region's utilities are becoming more aggressive in delivering energy efficiency and demand response.").

[16] Press Release, FERC, FERC Report Marks Significant Progress in Demand Response, Advanced Metering (Dec. 29, 2008); *see also* Demand Response and Advanced Metering Report, at pp. i and 46 ("[S]tates…such as Alabama and California, approved time-based rates for customers under their jurisdiction"; and "The Alabama Public Service Commission, following a two-year…pilot by Alabama Power Company, approved making the critical peak pricing option available for residential customers with AMI on a non-experimental basis").

[17] "Electric Power Markets in the West and Southeast," Office of Enforcement, FERC Docket No. AD08-9, at p. 16 (July 1, 2008) ("2007 State of the Markets Report"). This report was provided to FERC at its March 20, 2008 open meeting as agenda item A-3.

> Georgia Power's real-time pricing program for industrial customers lets customers choose whether to buy or not every hour, based on price. . . . [C]ustomer load in the program dropped during high priced hours on the peak price day (August 9), compared with loads on an otherwise similar day in July. Georgia Power estimates that real-time pricing reduced load for program participants by 23% during the most affected hour – about 1% of Georgia Power's overall load at the time. This reduction came at prices around $400/MWh, considerably lower than those reached when most demand-response programs were triggered in the Northeast during the 2006 heat wave.[18]

In addition, and as recently noted in FERC's National Action Plan, Gulf Power Company has been operating an Energy *Select* (formerly known as the Good Cents *SELECT*) program since the early 1990s.[19] This program includes an automated energy management system for homes and comes with a critical-peak pricing tariff. "Some 8,000 customers subscribe to the program and . . . Gulf Power estimates that the program induces a drop of 2 kW per participating customer, amounting to approximately 40 to 50 percent of customer load during the top 1 percent of the hours of the year."[20]

Southern Companies have not rested on these successes. For example, as of December 2009, Southern Companies had installed 1.9 million smart meters and are now approximately at the halfway point of their planned system-wide deployment of 4.6 million smart meters.[21] Furthermore, with an anticipated $165 million in federal stimulus funds to supplement their smart grid investments, Southern Companies are expediting their plans to add new advanced technologies that will optimize their grid performance and reliability.[22]

Statements Indicating that Transmission Construction Should be Done for Non-Firm/Speculative Purposes.

While Southern Companies agree with the major congestion-related conclusions in the Southeast, the Study is very expansive and addresses many topics. As such, it should not be unexpected that Southern Companies would disagree with some of the more specific

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[18] *Id.* at p. 14. As similarly noted in FERC's recently released National Action Plan on Demand Response, "[s]ince the mid-1990s, Georgia Power has operated the nation's largest real-time pricing program directed at large commercial and industrial customers." National Action Plan on Demand Response, FERC Docket No. AD09-10, at p. B-6 (June 17, 2010) ("National Action Plan").

[19] *Id.* at B-4.

[20] *Id.*.

[21] Southern Company 2009 Summary Annual Report (available at www.southernco.com/annualreports/ar09) ("2009 Annual Report") at p. 3.

[22] 2009 Annual Report at pp. 6-7.

conclusions/statements made therein. In an effort to have a more complete record, Southern Companies provide the following responses to a couple of statements in the Study that could be construed to indicate that transmission should be built for speculative/non-firm purposes.

"*But transmission congestion-up to and including a complete lack of transmission-can also limit development of new resource areas, as experienced over the past decade for renewable resources…*"[23]

"The concept of building to serve firm transmission requirements may make it difficult for the region to develop profitable variable-output renewable resources, since such plants generally use only non-firm transmission service."[24]

These statements seem to indicate that transmission should be built to accommodate non-firm, and hence speculative, uses of the transmission system. Such a result would inappropriately force firm users of the system (particularly native load) to subsidize speculative users of the system. In addition, in response to the statement that building to serve firm commitments may make it difficult to develop renewables because they use non-firm service, 1) renewables can also commit to firm service or make other commitments to have transmission constructed and 2) should a non-firm resource prove economical on a short-term basis, then a utility may ramp down its firm resources, which generally would make transmission capacity available on a non-firm basis.

Conclusion

Southern Companies agree with DOE's conclusions regarding the Southeast. The Study correctly concluded that there is little congestion in this region, as the transmission owners construct transmission so that generation facilities having firm commitments can deliver their output to load without constraint. In addition, DOE appropriately solicited and considered input from industry experts, which undoubtedly contributed to the accuracy of the Study (at least as applied in the Southeast). However, Southern Companies do not agree with the implication in the Study that transmission-related issues are major obstacles to renewable development. Instead, the main obstacle to large-scale renewable development is that they have proven (at least

[23] 2009 Study, at 1.

[24] 2009 Study, at 61.

to-date) largely uneconomic. In addition, there is more than sufficient publicly-available data for DOE to perform these congestion studies in accordance with Section 216 of the FPA, and requiring significantly more economic and market information be made publicly available would harm the competitive markets and consumers.

Sincerely,

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