

RRC Organizational Development Team Comments on Verison M

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1. **Suggest Change:** Clarify that the actions of the RRC and RCA related to reliability standards, integrated resource planning and other studies follow a process similar to existing statutory and regulatory processes (AS 42.05.361). Consistent with existing submittal procedures, the RCA should have the authority to send the plan or standard back to the RRC with concerns and other comments for the RRC to address and resubmit.

Why: Use proven regulatory processes with the shortest practicable timelines to the degree practicable with default approvals and subsequent review to enable the ERO to respond nimbly to changing circumstances. Providing a bottom-up design ensures the technical integrity of the system. Standards, plans and studies will only be useful, successful and applicable if designed with an essential technical context. This includes an understanding and respect of local criteria. The current regulatory framework for submittals to the RCA is familiar to the parties and commission staff and has been in use for decades.

2. **Suggested Change:** Add language to clarify the following parameters for pre-approval:
 - Exclude projects currently in development or approved for construction prior to acceptance of the first IRP.
 - Exclude projects reasonably classified as refurbishments and capitalized maintenance.
 - Focus pre-approval on the necessity of the projects and approval of estimated costs
 - Exclude from RCA jurisdiction authority over facility location and transmission routing to preserve local authority.
 - Add undersea transmission lines, storage and ancillary services
 - Allow for local reliability criteria and development to meet local requirements

Why: Clarify the scope of pre-approval to ensure this new RCA authority is focused on projects that are appropriate for an adjudicatory body and retain authority of local jurisdictions.

3. **Suggested Change:** Adjust language to change the date the RCA can act to March 31, 2021 and clarify their ability to take action if a received application is inadequate.

Why: Ensure the RRC actions and dates for RCA action are reasonable and allow time for existing efforts to succeed while providing a backstop for inaction.

4. **Suggested Change:** Add language to indicate the RCA, in determining whether to open a docket of investigation, will give due weight to the degree to which the reliability standard and/or integrated resource plan of the electric reliability organization was developed with an open and transparent, and has, consistent with the public interest, fairly considered the concerns of minority voting positions within the electric reliability organization and non-voting but participating members of the general public.

Why: Respect the output of a robust public process of the RRC while retaining established RCA authority.