

**VIA EMAIL**

July 20, 2012

Andrew Taylor  
Southern Company Transmission  
Southeastern Regional Transmission Planning

Dear Mr. Taylor:

On April 12, 2012 and June 1, 2012, the undersigned submitted written comments on the Southeastern Regional Transmission Planning (“SERTP”) process currently underway to comply with FERC’s Order 1000.<sup>1</sup> Specifically, we provided comments on the SERTP’s March 14, 2012 Preliminary Strawman and May 17, 2012 Strawman, respectively. We write now<sup>2</sup> to request that the SERTP sponsors provide a written response to the recommendations in our previous comment letters to let us know how our comments were taken into account in developing the June 27, 2012 Strawman. If our comments did not influence the development of the latest version of the Strawman, we would appreciate knowing why they were not helpful. We greatly appreciate the opportunity to provide feedback on the proposals, and we think our feedback likely will be more valuable if we understand how it is utilized in the evolution of the SERTP Order 1000 Strawman. We also request that the SERTP sponsors provide, via posting on the SERTP website, a redlined version of each Strawman, tracking any changes made since the last iteration, so that stakeholders can see the how the Strawman has changed. Finally, we would like to suggest an agenda item for the upcoming interim meeting on Order 1000, which we discuss below.

In our April 12 comment letter, we explained that, in our view, the SERTP’s Preliminary Strawman process to consider transmission solutions and alternatives to meet the region’s needs did not sufficiently address Order 1000’s obligations on grid needs driven by Public Policy Requirements (“PPR”). We also raised concerns and offered recommendations pertaining to Order 1000’s requirement that transmission providers (“TPs”) give transmission and non-transmission alternative (“NTA”) solutions full comparable consideration and that TPs identify opportunities to consult with stakeholders in the planning process. Finally, we discussed other opportunities for stakeholder input and TPs’ obligation to provide for a transparent planning process, which includes the disclosure of relevant analyses and data.

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<sup>1</sup> The April 12 comments were submitted on behalf of the Southern Environmental Law Center (“SELC”) and Southern Alliance for Clean Energy (“SACE”), regional nonprofit organizations dedicated to protecting the health and environment of the Southeast and promoting smart energy policy for the region, and the Sustainable FERC Project, an education and advocacy initiative that supports the work of a coalition of state, regional and national environmental and energy policy organizations across the country, including SELC and SACE, on electric regulatory policy issues. The June 1 comments were submitted on behalf of these same groups in addition to the Sierra Club, America’s oldest and largest grassroots environmental organization with 1.4 million members and activists throughout the United States, including chapters and tens of thousands of members in the Southeast states. One or more representatives of SACE, SELC, the Sustainable FERC Project and/or the Sierra Club participated in the first two quarterly meetings of 2012 and the May 2012 interim meeting on Order 1000.

<sup>2</sup> Per our email exchange, we understand that the SERTP sponsors will accept this letter, which is being submitted one week past the comment target date of July 13, 2012.

In our June 1 letter, we detailed four concerns and recommendations related to Order 1000's PPR obligations in response to the May 17 Strawman. We also offered recommendations on the consideration and evaluation of proposed transmission and NTA solutions, and the opportunity for stakeholders to provide meaningful input regarding the development of solutions to meet regional transmission system needs. Because it appears that most relevant parts of the June 27 Strawman were unchanged from the prior version, we are concerned that our comments may not have been considered. Therefore, it would be helpful to know how our comments were taken into account in developing the Strawman. It would also be helpful if the SERTP sponsors could provide a redlined version of each Strawman, so that Stakeholders could see how, if at all, the current version differs from prior iterations.

Finally, the undersigned organizations as well as several others recently prepared a white paper on recommendations for Order 1000 minimum compliance requirements, which we enclose with this letter. TPs and stakeholders lack clarity regarding Order 1000 compliance requirements, and we believe the white paper's delineation of minimum requirements will be useful to TPs and stakeholders in completing the upcoming Order 1000 compliance filings, as well as to the FERC commissioners and staff who will review these filings. We think it would be helpful to provide a brief summary of the white paper at the next interim meeting on Order 1000, and request that this be placed on the agenda for that meeting.

Again, we appreciate the opportunity to provide feedback and hope to receive a written response to our recommendations from the SERTP sponsors and to discuss the white paper at the next interim meeting. We also look forward to increased stakeholder collaboration through the SERTP process.

Best regards,

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