

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001-2113
TELEPHONE: (202) 879-3939 • FACSIMILE: (202) 626-1700

December 7, 2007

VIA ELECTRONIC FILING

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

Re: Oklahoma Gas and Electric Company, Order No. 890
OATT Attachment K Filing, Docket No. OA08-____-000

Dear Ms. Bose:

Pursuant to the Federal Energy Regulatory Commission's ("FERC" or "Commission") Order No. 890,¹ issued on February 16, 2007, Oklahoma Gas and Electric Company ("OG&E") hereby submits Attachment K to OG&E's Open Access Transmission Tariff ("OATT"). In Order No. 890, the Commission amended the *pro forma* OATT to require coordinated, open, and transparent planning of transmission systems. The Commission directed each transmission provider to submit, by October 11, 2007, a compliance filing containing a new Attachment K to its OATT describing a coordinated and regional planning process that complies with the nine planning principles adopted in Order No. 890.² By order dated July 27, 2007, the Commission extended the deadline for the filing of Attachment K to December 7, 2007.³

¹ *Preventing Undue Discrimination & Preference in Transmission Serv.*, Order No. 890, FERC Stats. & Regs. ¶ 31,241 (2007) ("Order No. 890").

² *Id.* at P 437. The nine planning principles are coordination, openness, transparency, information exchange, comparability, dispute resolution, regional participation, economic planning studies, and cost allocation for new projects. *Id.* at PP 444-561. On October 11, 2007, OG&E submitted a compliance filing incorporating into the OG&E OATT the non-rate terms and conditions of the Order No. 890 *pro forma* OATT. The October 11 filing was assigned Docket No. OA08-15-000.

³ *Preventing Undue Discrimination & Preference in Transmission Serv.*, Order Extending Compliance Action Date & Establishing Technical Conferences, 120 FERC ¶ 61,103 (2007).

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This filing consists of an original and five copies of the following:

- This transmittal letter;
- A clean version of OG&E's new Attachment K to its OATT (Attachment 1);
- A red-lined version of OG&E's new Attachment K to its OATT (Attachment 2); and
- A list of State Commissions and transmission customers on whom OG&E has served notice of this filing (Attachment 3).⁴

OG&E's Attachment K contains descriptions of the regional planning process administered by Southwest Power Pool, Inc. ("SPP") and the local planning process administered by OG&E, and a description of how these procedures satisfy the nine planning principles set forth in Order No. 890 to ensure coordinated, open, and transparent planning of transmission systems. On September 14, 2007, OG&E posted its draft Attachment K on its OASIS. OG&E received comments on its draft Attachment K from one interested party. On December 4, 2007, OG&E received from Oklahoma Municipal Power Authority ("OMPA") comments dated November 29, 2007. Given the short amount of time between OG&E's receipt of OMPA's comments and the Attachment K filing date, OG&E and OMPA have not had an opportunity to discuss OMPA's comments. However, OG&E believes that the tariff language submitted in its new Attachment K, as filed, satisfies the requirements of Order No. 890.

Any notices, orders, or other communications regarding this filing should be served on the following individuals:

Kimber L. Shoop
Senior Attorney
Oklahoma Gas and Electric Company
321 N. Harvey
Oklahoma City, OK 73101
Telephone: (405) 553-3023
E-mail: shoopkl@oge.com

Kenneth B. Driver
Brooke M. Corby
Jones Day
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Email: kbdriver@jonesday.com
bmcory@jonesday.com

⁴ Pursuant to the Commission's *Notice of Electronic Filing Guidelines for Open Access Transmission Tariffs & Related Filings Pursuant to Comm'n Order No. 890 and 18 C.F.R. Part 35 and 37* ("Guidelines Order"), OG&E is submitting its revised OATT via electronic filing. Also, consistent with the Guidelines Order, OG&E is not including a form of notice of filing with this submission.

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Respectfully submitted,

**OKLAHOMA GAS AND ELECTRIC
COMPANY**

By: Kenneth B. Driver
Kenneth B. Driver

Its attorney

Enclosures

Attachment 1

ATTACHMENT K

Transmission Planning Process

This Attachment K to OG&E's Tariff describes OG&E's Transmission Planning Process and how OG&E's process satisfies the nine principles applicable to each Transmission Owner's Transmission Planning Process.

I. Regional Planning Process

OG&E is a signatory of the SPP Membership Agreement and a full member of the SPP Regional Transmission Organization (RTO). OG&E has transferred operational control of its transmission facilities to the SPP Reliability Coordinator (RC). OG&E requests approval of all planned transmission maintenance outages from the SPP RC.

OG&E's Tariff is closed to new point-to-point transmission service. However, OG&E continues to administer several existing long-term network service agreements. SPP performs OG&E's Transmission Service Provider (TSP) function under the SPP OATT. This includes accepting or denying requests for new transmission service on the OG&E transmission system.

SPP performs OG&E's Planning Coordinator function. SPP coordinates development of transmission planning models, transmission expansion planning, transmission assessments, aggregation studies for transmission service/generator

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interconnection, and flowgate determination. OG&E participates in all of these processes.

OG&E complies with Order No. 890's nine principles on a regional basis by supporting and actively participating in the SPP RTO and in SPP's planning process.

II. Local Planning Process

A. Annual Process

Interested parties may submit to OG&E at any time: (1) information relevant to their transmission service needs; and/or (2) proposals for local transmission projects.

Each year, on May 1, OG&E will post on its OASIS website a draft "Transmission Expansion Plan," a forward-looking document that outlines transmission projects being considered. Parties eligible to receive Critical Energy Infrastructure Information (CEII) will have access to the posting.

On June 1, OG&E will hold a Planning Summit for all interested parties to discuss the draft Transmission Expansion Plan. Interested parties will then have until July 1 to submit written comments to OG&E concerning the draft.

By August 1 of each year, OG&E will post on its OASIS website a final Transmission Expansion Plan, which will address any meaningful proposals or alternatives identified by interested parties. OG&E will attach to the final Transmission Expansion Plan all written comments OG&E receives from interested parties.

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Interested parties may raise any outstanding issues as part of the SPP transmission planning process. Specifically, parties may raise issues with OG&E's Transmission Expansion Plan at SPP's annual August Planning Summit meeting.

B. Nine Planning Principles

OG&E's local planning process complies with Order No. 890's nine planning principles.

1. OG&E's local planning process complies with the Coordination Principle by providing for an annual meeting, followed by an opportunity for written comments, which allows customers and other stakeholders to participate in the development of OG&E's local transmission plans. OG&E will participate in local area meetings organized by SPP, and parties interested in OG&E's local planning also may participate in these SPP local area meetings.

2. OG&E complies with the Openness Principle by: posting a public redacted version of its draft Transmission Expansion Plan on its OASIS website; inviting all interested parties to attend the annual OG&E Planning Summit; and inviting all interested parties to submit comments on OG&E's draft Transmission Expansion Plan. OG&E will develop Critical Energy Infrastructure Information (CEII) controls similar to those adopted by SPP in Attachment O to the SPP OATT, including a confidentiality agreement that must be executed by each company to access certain materials and data related to local planning. A copy of the confidentiality agreement will be posted on the

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OG&E OASIS. The public redacted version of the OG&E Transmission Expansion Plan will include a CEII disclaimer and instructions on how to obtain a complete version of the OG&E Transmission Expansion Plan.

3. OG&E satisfies the Transparency Principle by posting annually a draft Transmission Expansion Plan, which discloses basic planning criteria, planning assumptions, and planning data, as well as study methodology, criteria, and processes and the status of any upgrades. OG&E will post its annual Form 715 filing, which identifies each of the OG&E company-specific planning criteria. OG&E will post and update quarterly the status of upgrades identified in the OG&E Transmission Expansion Plan. OG&E's local planning process allows for the participation of demand resources on a basis comparable to other resources.

4. OG&E's local planning process complies with the Information Exchange Principle. Interested parties may submit to OG&E at any time: (1) information relevant to their transmission service needs; and/or (2) proposals for local transmission projects. In addition, interested parties are invited to an annual Planning Summit to discuss OG&E's draft Transmission Expansion Plan and may submit written comments on the draft.

5. OG&E satisfies the Comparability Principle by allowing all interested parties to participate in the annual Planning Summit and by considering all written comments. Additionally, in creating its Transmission Expansion Plan, OG&E considers

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all customer proposals and, where appropriate, treats customer demand resources as comparable to the service provided by comparable generation resources.

6. OG&E complies with the Dispute Resolution Principle by coordinating its local planning process with the SPP planning process. Disputes that arise as part of OG&E's local planning process can be raised and addressed as part of the SPP planning process. Any dispute that persists will be addressed through SPP's dispute resolution process, as defined in Section 12 of the SPP OATT.

7. OG&E is a member of the SPP RTO and complies with the Regional Participation Principle by supporting and participating in the SPP planning process.

8. OG&E complies with the Economic Planning Studies Principle by participating in the SPP OATT and the SPP planning process. Requests for economic planning studies should be submitted to SPP and processed pursuant to the SPP OATT.

9. OG&E complies with the Cost Allocation Principle as a member of SPP subject to the SPP OATT and its cost allocation rules.

Attachment 2

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Attachment 3

City Manager
City of Purcell
P.O. Box 71
Purcell, OK 73080-0071

Southwestern Power Administration
One West Third Street
Tulsa, OK 74103-3502

Public Works Manager
City of Paris, Arkansas
P.O. Box 271
Paris, AR 72855

Geary Utilities Authority
P.O. Box 125
Geary, OK 73040-0125

Oklahoma Corporation Commission
Public Utility Division
P.O. Box 52000
Oklahoma City, OK
73152-2000

Arkansas Public Service Commission
1000 Center St.
Little Rock, AR 72201