

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 1) For all parties: Please provide a thorough description of the process that led to SPP's self described "Robust Plan 1", "Robust Plan 4", "Robust Plan 5", and "Robust Plan 6" to be the only plans to undergo "stability analysis".

**Response:**

Stability performance was assessed for 2010 Integrated Transmission Plan 20-Year Assessment ("ITP20")<sup>1</sup> designs in the final stages of the process to ensure the reliable function of the design. It was also utilized to better understand the fundamental limitations of the 345kV and 765kV electrical platforms. Staff recommended Robust Plan ("RP") 1 as the best balance of economics and robustness and necessarily confirmed the stability performance for this design before proceeding with a recommendation; however, the SPP Markets and Operations Policy Committee ("MOPC") decided to recommend the ITP20 Cost Effective Plan. Abbreviated 765kV designs, RP5 and RP6, were developed to address ongoing concerns with the much more expensive 765kV - RP4 design. To help address questions about differences between the 765kV technology and the 345kV technology, the stability of RP4, RP5 and RP6 was evaluated to highlight fundamental operational limits between the two power levels. This evaluation does not presume superior economic performance of any design.

---

<sup>1</sup> The ITP20 Report is available at: <http://www.spp.org/publications/ITP20%20Report%20Draft.pdf>.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 2) For SPP: Please state all possible options for Empire regarding its future relationship with SPP, including an Entergy-style ITC relationship.

**Response:**

From SPP's perspective, Empire has two options:

- (1) Empire continues to be a member of SPP as it is today with no changes; or
- (2) Empire could withdraw from SPP in the manner required under the SPP Membership Agreement, subject to the approval of the Federal Energy Regulatory Commission ("FERC") and payment of a withdrawal fee.

Under option 2, Empire would be required as a FERC-jurisdictional entity to provide to FERC its plan for meeting the requirements of FERC rules and orders as it does today through its membership in SPP. This could include many different options, but those would be best described by Empire rather than SPP.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 3) For SPP, and other interested parties: For Robust Plans 1, 4, 5, and 6, please provide an estimate in dollars of the amount of 100 kv – 300 kv transmission project “underlay” that will be required to meet NERC standards of reliability.

**Response:**

Currently, there is no available dollar value estimate of the amount of 100 kV—300 kV transmission project “underlay” that will be required. A current estimate of \$1.2B is specified in the proposed 2010 Regional Reliability SPP Transmission Expansion Plan (“STEP”)<sup>2</sup> assessment for new transmission facilities to maintain reliability for the 10 year load growth horizon. Assuming SPP load continues to grow beyond this into the 20 years horizon, this number will likely increase. These ITP20 projects optimize the accessibility of lower cost energy resources and provide enhanced reliability at the EHV level, but further projects will be needed to allow delivery of these resources to specific load centers like Branson, Kansas City and Springfield.

---

<sup>2</sup> The 2010 STEP Report is available at: <http://www.spp.org/section.asp?group=2005&pageID=27>.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 4) For all parties: Attachment J, Section III.D of the SPP Tariff discusses the possible outcome of an “imbalanced zonal cost allocation in the SPP footprint”. What possible remedies exist regarding “imbalanced zonal cost allocation in the SPP footprint”?

**Response:**

Any imbalance in cost allocation would be addressed through the Unintended Consequences provisions of Attachment J, Section III.D of the SPP Tariff. The Unintended Consequences provisions, accepted by FERC in its June 2010 order on the SPP Highway/Byway cost allocation filing,<sup>3</sup> was developed through the SPP stakeholder process and was evolving even as it went through the MOPC and the SPP Board. The current provision allows for a more frequent and more thorough analysis for Unintended Consequences to determine if there are equity issues that need to be addressed through the process in the Tariff. As the Highway/Byway cost allocation went into effect in June 2010, it will take some time for there to be enough data from the use of this methodology to accurately assess the benefits for a particular region or entity and determine if long-term equity issues exist. If an entity, including the Commission, believes that Unintended Consequences provision of the SPP Tariff, should be addressed prior to 2013, the SPP process – in particular the CAWG/RSC – offers a forum to address the OATT before 2013.

---

<sup>3</sup> The Highway/Byway SPP Tariff revisions were filed with FERC on April 19, 2010. A copy of the complete filing is available at: [http://www.spp.org/publications/2010-04-19\\_Highway-Byway%20Cost%20Allocation\\_ER10-1069.pdf](http://www.spp.org/publications/2010-04-19_Highway-Byway%20Cost%20Allocation_ER10-1069.pdf). FERC approved Highway/Byway on June 17, 2010. A copy of the FERC Order is available at: [http://www.spp.org/publications/2010-06-17\\_Order%20-%20Highway-Byway%20Cost%20Allocation\\_ER10-1069.pdf](http://www.spp.org/publications/2010-06-17_Order%20-%20Highway-Byway%20Cost%20Allocation_ER10-1069.pdf).

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 5) For SPP: Please describe the process utilized to calculate what was referred to in the Priority Projects report as “quantitative benefits”. For this response, please provide 1) the definition and criteria utilized to qualify as a “quantitative benefit” and 2) the methodology description used to determine the amount of each separate element of the “quantitative benefits”.

**Response:**

Quantitative benefits were developed with the guidance and expertise of stakeholders, consultants and staff assistance. These benefits were assessed for three model years and extrapolated to derive 40-year aggregated benefits. Quantified benefits, including Adjusted Production Cost (“APC”), change in losses (capacity component), reliability impacts, wind revenue impacts, and gas price impacts, are explained below:

APC: Adjusted Production Cost is a measure of the impact on production cost savings by Locational Marginal Price (“LMP”), accounting for purchases and sales of economic energy interchange.

Change in losses – Capacity: Capacity savings associated with a loss change are determined by looking at the selected hourly model to find the change in losses associated with a transmission upgrade. The Benefits Analysis Techniques Task Force (“BATTf”) established standard capacity prices to capture capacity savings. Calculations were based on a Combustion Turbine (“CT”) replacement, currently priced at \$750 per kW installed (based on the expected cost to install various types of machines used by BATTf members).

Reliability Impact: Reliability impacts are calculated by assessing which previously identified reliability projects would be eliminated, deferred, or advanced with the inclusion of the Priority Projects.

Wind Revenue Impacts: Conventional thermal generation is modeled explicitly based on ownership or designation for each unit. This explicitly modeled generation is then factored into APC calculations through each resource’s cost to produce energy, as well as determining whether a zone has excess energy each hour (revenues from sales) or lacks sufficient generation to serve its load (costs from purchases).

APC calculations do not directly consider the revenues paid to wind resources because of the manner in which engineering tools monitor wind interactions. The process models wind so that variations in hourly wind output can be considered and the resulting impacts of wind generation on revenues from sales and costs from purchases are later added to obtain a corrected overall measure of these components.

Gas Price Impacts: SPP contracted with KEMA to estimate the impact of Priority Projects on overall natural gas consumption. The effect of greater access to wind impacted reduced utilization of gas, which lead to a reduction in gas prices. This was estimated by KEMA as a qualitative benefit for Priority Projects.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 6) For SPP: Please describe the process utilized to calculate what was referred to in the Priority Projects report as “qualitative benefits”. For this response, please provide 1) the definition and criteria utilized to qualify as a qualitative benefit and 2) the description of the methodology used to determine the amount of each separate item included in the “qualitative benefits”.

**Response:**

The Brattle Group was retained to determine the qualitative benefits of additional “economic output” the region could realize as a result of additional jobs related to manufacturing, installing, and operating both the Priority Projects and the additional resources that would be enabled by those projects. The Brattle Group utilized the Job and Economic Development Impact model (“JEDI”) as well as the Minnesota Impact Analysis for Planning (“IMPLAN”) models. These models are classic input-output models commonly used by economists, state and federal governments, and state economic development departments to estimate potential economic impacts of projects. The benefits calculated by The Brattle Group were considered to be “qualitative” in nature because they were not calculated based on the results of SPP staff’s production cost or power flow studies.

Both IMPLAN and JEDI quantify economic impacts in three categories: (i) number of jobs created in the region (in full-time-equivalent years of employment or “FTE-years”); (ii) the resulting personal income earned by employees in the region (i.e., “earnings”); and (iii) the economic activity generated in the region (i.e., increased “economic output” as measured in total sales and resale revenues of businesses in SPP member states). Income (i.e., earnings) refers to the compensation for workers in all of the directly or indirectly affected industry categories as supported by the stimulated increased output of goods and services.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 7) For all parties: What information or assurances will be available to the MO PSC to determine whether the costs for projects constructed in the SPP footprint based on SPP Board-issued Notices To Construct should be recovered from Missouri ratepayers? Will this information or assurance differ if an affiliate company of an SPP member is involved in the construction of the transmission project.

**Response:**

The decision as to whether and how costs for projects are recovered is ultimately a decision of regulators. SPP operates and conducts its planning processes under the jurisdiction of FERC and through its FERC-approved Open Access Transmission Tariff (“SPP Tariff”).<sup>4</sup> Those member utilities in Missouri who are jurisdictional to FERC will have to justify their costs to FERC through their respective rate cases. Interested parties, including state commissions, can and have participated in those rate cases. This should not differ in the case of an affiliate company so long as that company is FERC-jurisdictional. SPP can provide information to state or federal regulators to assist regulators when making decisions regarding cost recovery.

---

<sup>4</sup> The SPP Tariff is available at: <http://www.spp.org/section.asp?group=215&pageID=27>.



**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 8) For SPP: How much information will each entity require regarding the development of transmission project cost estimates provided by transmission owners in the SPP footprint? Does SPP have a standard requirement of the minimum amount of information that must be submitted by transmission owners to support their transmission cost estimates.

**Response:**

SPP does not currently have a standard requirement related to the minimum amount of information that must be submitted by transmission owners to support their transmission cost estimates. Recognizing the need to standard requirement, the SPP Regional State Committee (“RSC”) made a motion recommending that SPP evaluate how cost estimates are established for transmission projects before Cost Benefit Analysis are performed.<sup>5</sup> As a result of this motion, SPP Staff has been addressing the RSC recommendations and has recommended to the SPP MOPC that the Project Cost Task Force be created.<sup>6</sup> This stakeholder task force would be responsible for stakeholder input, oversight, and accountability to provide a transparent development and review of transmission project estimate and cost variances.

The Priority Projects effort utilized estimation processes based on each Transmission Owner’s traditional internal methods of developing planning project level estimates. These planning estimation methods were improved upon based on feedback from the Balanced Portfolio process where common information for equipment types were collected for comparison purposes. These data requirements will continue to be required as appropriate and modified

---

<sup>5</sup> Following a lengthy discussion regarding recent project cost estimate increases and possible refinements to current cost estimation and planning procedures, the RSC adopted five motions on October 25, 2010. On October 26, 2010, the SPP Board of Directors approved the motions and assigned the SPP Strategic Planning Committee and the Transmission Working Group responsibility for consideration of the issues raised in the RSC motions. The motions are detailed in the minutes from the October 26, 2010 Board of Director’s meeting, available at: <http://www.spp.org/publications/BOD102610.pdf>.

<sup>6</sup> The Project Cost Task Force is discussed herein in SPP’s response to question no. 9.

from ongoing improvements with input and guidance from the RSC based on current whitepaper discussions.<sup>7</sup>

---

<sup>7</sup> SPP presented its initial responses to the RSC recommendations in the form of whitepapers at the December 3, 2010, Strategic Planning Committee meeting, available at: <http://www.spp.org/publications/SPCAGD&BKGD120310.pdf>. These whitepapers are being reviewed through the stakeholder process and will continue to be revised and refined.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 9) For all parties: What options are available to a party that disagrees with a transmission project cost estimate provided by a transmission owner to SPP?

**Response:**

The SPC, at its January 13, 2011 meeting, formed the Project Cost Task Force to assist in development of white papers in response to the RSC motions. This would be an appropriate stakeholder group to engage in discussions related to any disagreement with project cost estimates. Those discussions and any proposed solutions should be vetted through the stakeholder process, up to and including the SPP Board of Directors. In addition, the party may pursue any remedies available to it under state law.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 10) To SPP: Does SPP track whether a transmission owner meets its original cost estimate of a transmission project? If so, please provide that process. Does SPP require specific standards that must be followed by any entity performing a SPP sponsored transmission project? If yes, please describe these standards.

**Response:**

SPP tracks the original cost estimate with the tracking of the overall project information. Since the 4th Quarter of 2010, SPP has added the Original Cost Estimate, where applicable, to the Project Tracking List which tracks the progress of active projects within the SPP portfolio. Tracking project construction and the construction standards of approved projects is outside the scope of the SPP RTO, but SPP can work with the Commission to develop administrative coordination where practicable. As this was a topic addressed in the RSC's recommendations, SPP anticipates that the process will be enhanced once the responses to the RSC recommendations are implemented.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 11) To SPP: Does SPP track whether a transmission owner meets its cost estimate of a transmission project given as a response to an SPP Board-issued Notice To Construct? If so, please provide that process. Does SPP require specific reporting and monitoring activities that must be followed by any entity performing a SPP sponsored transmission project? If yes, please describe these activities. Does SPP require any independent external verification that actual transmission costs are appropriate.

**Response:**

Yes. Each quarter SPP sends the most recent Project Tracking List, which contains the active projects within the SPP portfolio, to the project owners for updates. Each year's project tracking schedule is posted on the SPP website. The following information is requested from each project owner on a quarterly basis:

- In-Service Date
- Cost Estimate
- Final Cost
- Project Lead Time
- Project Status Comments

Each quarterly project update is a two stage process where staff reviews the initial submittals and redistributes the Project Tracking list for the project owners to review and to submit necessary mitigations for those projects that are in a delayed status.

This information is reflected in a quarterly Project Tracking Report<sup>8</sup> which is delivered to the MOPC, RSC, and SPP Board of Directors for their review, and is posted on the SPP website. This Project Tracking Report contains information on all projects being tracked by SPP and provides a summary which includes analysis and metrics on the projects (including completed projects), cost analysis, status changes, and miles of transmission completed.

Staff reviews each quarterly Project Tracking Report for cost estimate increases of more than 20% from the previous quarter and assesses the cause of any such cost increase for each

---

<sup>8</sup> The quarterly Project Tracking Reports are available at: <http://www.spp.org/section.asp?group=1867&pageID=27>.

project in this list. Staff then makes a recommendation as to whether the change in the cost estimate is sufficient to justify the project being replaced with an alternate project. If SPP determines that modifications need to be made to a project, or sufficient cost estimate change is present to justify an alternate NTC Project, SPP will notify stakeholders and hold a 15-day stakeholder review period. If action warrants, a SPP proposed modification to a NTC Project will go to the SPP Board of Directors for approval.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 12) To SPP: In the November 23, 2010 MO PSC Agenda session, SPP Employee Les Dillahunty stated that out of 65 NTCs issued for transmission projects, with a cost estimate of \$169 million, the total difference from the estimated cost (counting underages and overages) was around \$2 million. Please provide any and all supporting information regarding that statement, including a list of the 65 projects, the original cost estimates for those projects (if any), the project cost estimates in response to an SPP Board-issued Notice To Construct, the name of transmission owner constructing the project, the expected completion date of the project, and the actual completion date of the project.

**Response:**

The table below represents all upgrades in the 2010 4th Quarterly Project Report lists the projects that were noted as "Complete" with a reported Final Cost.<sup>9</sup> This Report contains the 65 projects, along with the transmission owner, previous cost estimates prior to the final cost, and final cost of projects, which is the basis for Les Dillahunty's statement on November 23, 2010.

| All Completed Projects with Reported Final Costs January 2009-<br>November 2010 |   |                        |               |
|---|---|------------------------|---------------|
| Total<br>Upgrades   | Previous Cost Estimate<br>prior to Final Cost | Final Cost of Projects | Cost Variance |
| 65  | \$167,167,031                                 | \$168,939,984          | \$1,772,953   |

<sup>9</sup> 2010 4th Quarterly Project Report is available at: <http://www.spp.org/publications/SPP%202010-Quarter-4-Project%20Tracking%20Report.pdf>.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 13) For all parties: What options are available to the MO PSC if it finds or wishes contest the cost recovery for projects constructed in the SPP footprint based on SPP Board-issued Notices To Construct?

**Response:**

Entities wishing to contest recovery of cost for projects in the SPP footprint have a number of options. From SPP's perspective, the most important way for the Commission to express its concern over cost recovery and cost allocation, is through participation in the SPP stakeholder process. Specifically, this includes participation and discussion with the RSC, where cost allocation responsibility is primary. The Unintended Consequences provisions of the SPP Tariff, approved by FERC in 2010 as a part of the Highway/Byway cost allocation methodology,<sup>10</sup> allow for members of the SPP to bring to the RSC their concerns related to the equity or balance in their cost allocation, which is in effect the same as concern related to cost recovery. Additionally, other potential avenues for state commissions to address concerns related to cost recovery or costs of projects may be through (1) their ability to determine who is entitled to build and operate transmission within their jurisdiction; (2) imposing conditions upon approval for siting or construction of a project; (3) participation in a jurisdictional entity's FERC rate case; (4) participation in regulatory proceedings in other states related to transmission projects; and (5) review and approval of a jurisdictional utilities' Integrated Resource Plan.

The Commission should assess all of the avenues for expressing its concerns related to cost recovery for transmission projects and determine what best suits their needs. However, participation in the RSC is always beneficial in putting these issues before all the SPP state regulatory commissions for discussion.

---

<sup>10</sup> The Highway/Byway SPP Tariff revisions were filed with FERC on April 19, 2010. A copy of the complete filing is available at: [http://www.spp.org/publications/2010-04-19\\_Highway-Byway%20Cost%20Allocation\\_ER10-1069.pdf](http://www.spp.org/publications/2010-04-19_Highway-Byway%20Cost%20Allocation_ER10-1069.pdf). FERC approved Highway/Byway on June 17, 2010. A copy of the FERC Order is available at: [http://www.spp.org/publications/2010-06-17\\_Order%20-%20Highway-Byway%20Cost%20Allocation\\_ER10-1069.pdf](http://www.spp.org/publications/2010-06-17_Order%20-%20Highway-Byway%20Cost%20Allocation_ER10-1069.pdf).



**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 14) For SPP: Does SPP have a comprehensive overall cost control system in place intended to provide State Regulators that all costs incurred for SPP transmission projects and assigned to SPP members are prudent and reasonable? If yes, please provide a copy of the documentation of such a system. If no, does SPP intend to approve and execute the building transmission projects without having such a system in place?

**Response:**

The current SPP Quarterly Project Tracking process as described in question 11 was originally developed at a much more elementary level. The quarterly Project Tracking Reports<sup>11</sup> have been presented to the SPP Board of Directors since May of 2007 in response questions arising from the SPP Board of Directors, as well as questions which arose at the state level. Each quarter, this process has evolved in increasing detail and continues to be refined.

---

<sup>11</sup> The quarterly Project Tracking Reports are available at: <http://www.spp.org/section.asp?group=1867&pageID=27>.

**Missouri Public Service Commission  
Case No. EO-2011-0134  
In the Matter of an Investigation Into  
Southwest Power Pool Cost Allocations and Cost Overruns**

**SOUTHWEST POWER POOL, INC.  
RESPONSES TO QUESTIONS FROM COMMISSION STAFF  
RECEIVED ON DECEMBER 17, 2010**

**INFORMATION REQUESTED:**

- 15) For SPP: What is the amount of SPP transmission project construction expenditures expected over the next ten years beginning 2011 for projects > 300KV and projects > 100KV but < 300KV.

**Response:**

For projects greater than 300 kV, the expenditures total approximately \$2,775 million. For projects less than 100 kV but greater than 300 kV, the expenditures total approximately \$1,610 million. These totals include all 2010 STEP projects for SPP with and without NTCs approved by the SPP Board of Directors.