

**Subject:** Rulemaking - Certificate of Need Chapter 7829

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**Date:** 6/25/2013 4:22 PM

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All,

With respect to Chapter 7829, ITC Midwest LLC recommends that further consideration be given to how the engineering data requirements and the forecasting data requirements are set out in the rules. In the proposed revisions, they are bundled. It may be clearer if the engineering requirements were delineated separately.

Also, Rule 7849.0220 as revised requires the applicant to include a discussion of "whether the forecasted expansion of the integrated regional transmission system affects the applicant's claimed need for the proposed project". ITC Midwest LLC proposes that the requirement be revised to discuss more generally how the project fits into regional planning efforts and to clarify that only planned transmission and generation additions that would affect the need for the project should be included:

**Subp. 2. Large high voltage transmission lines (LHVTL). Regional Transmission Planning.** ~~Each application for a proposed LHVTL must contain a description of whether the forecasted expansion of the integrated regional electric transmission system affects the applicant's claimed need for the proposed project. The application should include a discussion of the applicable RTO planning process that identified the need for the facility and whether the facility is part of an approved RTO region or interregional plan.~~ An application must also include data from the RTO on planned additions or retirements of regional transmission lines or generation facilities that affect the need for the project.

Lisa

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