

## Executive Summary

The FERC supports the Electric Energy Board's (EEB) efforts to advance the Framework for Energy Generation (FWEG) under the National Energy Research (NER) and has been an observer in the EEB Working Group (EWG) proceedings since its inception. While the FERC has significantly advanced the definition of the EEB Integration Challenge and a Draft Core Analysis (CA) Framework for EEB, many questions, such as other key "Critical path" assumptions, input uncertainties for a B2B "market mechanism."

As a result, the development of the B2B framework is not sufficient information to assure that the EEB can continue for its program will result from the process. The FERC believes that a B2B framework should ensure the cost-effective adoption of EEB technologies for **enabling existing EEBs's emerging electricity systems such as the EEB and its other projects.**

The FERC suggests that additional guidance is needed to build on the recommendations of the EEB's in order to help address the EEB's choice of next steps for completing the B2B framework. This document outlines 10 recommendations across several themes:

1. Improve collaborative engagement among the EEB, its members and the EEB to establish requirements for cost-effectively meeting electricity needs with EEB:
  1. EEB to define the relevant requirements for a "gridhead"
  2. A common B2B framework to apply to both utility-owned and non-utility-owned EEBs.
  3. EEBs should establish a process to be engaged in the planning process.
  4. Develop a process to ensure collection of assumptions and implications.
  5. Develop a process to capture ongoing business interest.
2. The definition of the EEB's critical conditions for a B2B should capture a comprehensive and logical set of:
  1. Key assumptions should be reasonable to publicly available planning documents.
  2. Substances of the "assumptions" that compliance requirements and their full costs should be transparently established.
  3. All systems should be assessed under the same "market" benchmarks.
  4. A full analysis of the impact and potential return of auxiliary heat resources should be established.
3. The other integration of EEBs into the power electricity system modeling should be used to assess:
  1. Energy impacts including losses and price impacts, and
  2. Capacity benefits.
4. Incorporation of environmental attributes must be transparent and reasonable:
  1. EEB guidance on the applicable requirements should be provided.
5. Characterizing the external impacts of technologies would help facilitate the preparation of a B2B:
  1. EEB should provide guidance and assessment values for EEB and air implications, etc.
  2. The EEB should provide guidance on how the government's long-term energy security is being maintained.

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