

STATE OF FLORIDA

COMMISSIONERS:
E. LEON JACOBS, JR., CHAIRMAN
J. TERRY DEASON
LILA A. JABER
BRAULIO L. BAEZ
MICHAEL A. PALECKI



DIVISION OF POLICY ANALYSIS &
INTERGOVERNMENTAL LIAISON
CHARLES H. HILL
DIRECTOR
(850) 413-6800

Public Service Commission

October 18, 2001

Glenna D. Logan
Administrative Assistant to Commissioner Nelson
Michigan Public Service Commission
6545 Mercantile Way
Lansing, Michigan 48911-5990

Dear Ms. Logan:

Yesterday, a filing was made electronically on behalf of the Southeastern Association of Regulatory Utility Commissioners. Enclosed is a copy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Miller".

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf
Enclosure

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Public Service Commission

October 18, 2001

Honorable Hullihen W. Moore
Virginia State Corporation Commission
1300 East Main Street
Richmond, Virginia 23218

Dear Commissioner Moore:

Yesterday, a filing was made electronically on behalf of the Southeastern Association of Regulatory Utility Commissioners. Enclosed is a copy.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia B. Miller".

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf
Enclosure

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Public Service Commission

October 18, 2001

Mike Kormos
Electronic Scheduling Collaborative
116-390 Village Boulevard
Princeton, New Jersey 08540-5731

Dear Mr. Kormos:

Yesterday, a filing was made electronically on behalf of the Southeastern Association of Regulatory Utility Commissioners. Enclosed is a copy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia B. Miller".

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

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DIVISION OF POLICY ANALYSIS &
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Public Service Commission

October 18, 2001

Mr. Mike McElhany
Electronic Scheduling Collaborative
116-390 Village Boulevard
Princeton, New Jersey 08540-5731

Dear Mr. McElhany:

Yesterday, a filing was made electronically on behalf of the Southeastern Association of Regulatory Utility Commissioners. Enclosed is a copy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia B. Miller".

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

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**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

Electricity Market Design and Structure

Docket No. RM01-12-000

**COMMENTS OF THE SOUTHEASTERN ASSOCIATION OF
REGULATORY UTILITY COMMISSIONERS (SEARUC)**

OCTOBER 2001

The Southeastern Association of Regulatory Commissioners (SEARUC) believe that good policy decisions are made after careful research and analysis of pertinent facts from direct experience. It is important to have an in-depth understanding of the current status of generation, transmission flows, trading patterns, and load growth projections before any meaningful cost-benefit analysis can be performed in arriving at policy decisions regarding transmission. We regret that FERC has not chosen to perform such an analysis before setting the course for a single, large RTO for the Southeast. However, the Southeastern Commissioners believe such an analysis is critical to good policy decisions. In as much as the aggregate experience of the SEARUC commissioners is significant and applicable to the markets in the Southeast, we are conducting our own analysis. We respectfully ask FERC to delay any further proceeding on a Southeastern RTO until such time as we have completed our study, which will be performed in a timely manner.¹

Respectfully submitted,

E. Leon Jacobs, Jr.
President, SEARUC

DATED: October 17, 2001

¹ Alabama, Arkansas, North Carolina, South Carolina, Tennessee, Mississippi and Louisiana fully support the study and all of the above comments. Georgia, Florida, Virginia and Kentucky fully support the comments as to importance of and need for the study, but do not address the issue of a delay in FERC's proceedings.