



Western
Area Power
Administration

Proposed Revisions to WAPA's Open Access Transmission Tariff

Customer Meeting Presentation

August 19, 2019
WebEx Meeting

Panel

- Steve Sanders, Operations & Transmission Advisor, UGPR
- Bob Kennedy, Open Access Services Compliance Advisor
- Ron Klinefelter, Assistant General Counsel & VP



Initial 07/26/19 OASIS Posting - Potential OATT Revision 19-01

Western Area Power Administration (WAPA)

Open Access Transmission Tariff (OATT) Revision(s), Status and Postings

Last Update: 07/26/2019: Announcement of Potential OATT Revision 19-01

OATT Revision 19-01 (ACTIVE) : (FAQs: [WAPA-Potential-OATT-Revision-19-01-FAQs.pdf](#) ; FAQs Last Posted/Updated: **07/26/2019**)

07/26/2019 (NEW): Initial Notification of Proposed OATT Revision 19-01, Announcement of Customer Meeting: WAPA is evaluating OATT revisions to primarily address FERC [Order No. 827](#) and [Order No. 842](#) as WAPA indicated it would do during the prior OATT Revision 18-01 process and in its associated filing under FERC Docket No. NJ19-10-000. In addition, WAPA is also evaluating other OATT clean-up and maintenance revisions. See announcement here: [WAPA-Potential-OATT-Revision-19-01-Announcement.pdf](#). WAPA is also providing notice via electronic mail to its customers.



Initial 07/26/19 OASIS Posting - Potential OATT Revision 19-01 (Cont'd)

WAPA will hold a Customer Meeting on **August 19, 2019 at 10am MDT (via WebEx)** to present its proposed OATT revisions. WebEx information is here: [WAPA-OATT-Revision-19-01-Customer-Meeting-2019-0819-Webex-Info.pdf](#). This meeting is part of WAPA's process to seek stakeholder comments on the proposed OATT revisions. **WAPA's 30-day comment period will begin once WAPA posts its proposed OATT revisions before the August 19, 2019 Customer Meeting.** WAPA invites all interested parties to attend. In addition to sharing the proposed revisions, WAPA will also outline the expected timeline to respond to stakeholder feedback, complete the OATT revisions, and file the OATT revisions with FERC.

Additional details, including the meeting presentation and redlines of WAPA's proposed OATT revisions, will be posted on this page prior to the August 19, 2019 Customer Meeting. Please direct questions/comments to your [OATT Regional contact\(s\)](#).



Other OASIS Postings and Stakeholder Notifications

- WAPA Public Affairs also issued an email notification to all customers informing them of the posting of the potential OATT Revision 19-01 on 07/26/2019.
- WAPA posted the proposed OATT Revision Redlines and Customer Meeting Presentation on its OASIS sites on 08/14/2019. **That posting started the 30-day comment period.**
 - WAPA Public Affairs also issued an email notification to all customers informing them of the posting on the same day.



Background/Status on previous WAPA OATT Filings

- Described on WAPA's Regional Transmission Provider's Open Access Same-Time Information Systems (OASIS) sites under the WAPA Open Access Transmission Tariff (OATT) Documents page at the following link:

<http://www.oasis.oati.com/woa/docs/WAPA/WAPAdocs/WAPA-Tariff-Docs.htm>



Overview of Current WAPA OATT Filing Proposal – Revisions to Address Certain FERC Rulemaking Orders

Inclusion of OATT changes from FERC Orders Nos. 827 and 842 to address several of the additional outstanding FERC Orders necessary to continue to maintain WAPA's safe harbor OATT status.

- Address commitment made to FERC in the Filing for OATT Revision 18-01 to begin this subsequent OATT revision in the second quarter of 2019.



Overview of Current WAPA OATT Filing Proposal – Other Revisions

- Remove specific Power Factor language from Transmission Service Agreements
- Update Attachment C (Methodology to Assess Available Transfer Capability)
- Update Attachment J (Provisions Specific to the Transmission Provider)
- Miscellaneous revisions (e.g. Update name of OATT, OATT definitions, correct case of undefined and defined terms, update name of WAPA HQ Office, Correct hyperlinks, Section/Article references, general clean-up, etc.)



Deferral of Revisions for Other Currently Outstanding FERC Rulemaking Orders 845 and 1000

- WAPA needs to continue to defer revisions associated with the following FERC Orders:
 - Order 845, Reform of Generator Interconnection Procedures and Agreements
 - Order 1000, Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities
- **Plan to address these FERC Orders in next OATT revision(s) starting late 2019, if ready.**



Deferral of Revisions for FERC Rulemaking Order 845

- WAPA needs to defer revisions with:
 - Order 845 – WAPA still needs to reviews the final pro-forma LGIP, LGIA, SGIP, and SGIA revisions to ensure no statutory/regulatory conflicts exist.
 - Internally, WAPA needs to complete significant review regarding the implementation requirements for Order 845, and that work cannot be completed in time for OATT Revision 19-01 targeted schedule.
 - After WAPA completes these analyses, reviews, and obtains input from affected stakeholders, WAPA will submit a filing(s) to FERC addressing Order 845.



Deferral of Revisions for FERC Rulemaking Order 1000

- WAPA's Rocky Mountain (RMR), Desert Southwest (DSW) and Sierra Nevada (SNR) Regional Offices actively participated in the formation of the WestConnect planning region and each joined and are currently participating in the FERC-approved WestConnect planning region as a "Coordinating Transmission Owner".
- WAPA was prepared to incorporate revisions to Attachment P of its OATT to reflect such and submit a filing to FERC to address Order 1000 requirements prior to public utility Transmission Providers in the WestConnect planning region filing notice with FERC indicating they may modify their filed OATT planning attachments to remove the FERC-approved "Coordinating Transmission Owner" provisions.
- WAPA understands those public utilities have not yet made any changes to their OATTs nor have the parties agreed to any proposals regarding alternatives to the "Coordinating Transmission Owner" provision at this time.



Deferral of Revisions for FERC Rulemaking Order 1000 (cont'd)

- The “Coordinating Transmission Owner” provision is a key concept that allows non-public utility participants in the WestConnect planning region to...
 - voluntarily contribute to—rather than being subjected to binding cost allocation for—the costs of new transmission facilities selected in the applicable regional and interregional transmission planning processes for purposes of cost allocation.
- Therefore, WAPA still needs to defer revisions for Order 1000 to Part II of Attachment P to its OATT until such time as WAPA can determine whether the potential upcoming modifications to the WestConnect planning region will conflict with WAPA statutory requirements, and whether RMR, DSW, and SNR can continue to participate in the WestConnect planning region.
- WAPA will address Order 1000 in a subsequent OATT revision as soon as practicable after it completes the necessary reviews and obtains input from affected stakeholders.



Revisions to Address Certain FERC Rulemaking Orders

- Order 827: Reactive Power Requirements for Non-Synchronous Generation
- Order 842: Essential Reliability Services and the Evolving Bulk-Power System—Primary Frequency Response
- Links to initial Orders: [Order No. 827](#) , [Order No. 842](#)



Order 827 – Proposed OATT Revisions

- Order 827 revised pro-forma LGIA, LGIA Appendix G, and SGIA to require **NEWLY** interconnecting **NON-SYNCHRONOUS** Generating Facilities (GFs) to provide reactive power.
- **Proposed Revisions:**
- Modify LGIA 9.6.1 and SGIA 1.8.1 (PF Design Criteria) to require all newly interconnecting non-synchronous GFs that have not executed an Interconnection Facilities Study Agreement (IFSA) as of the **Effective Date of the OATT Revision 19-01 changes** to maintain Power Factor at high-side of GF substation within .95 leading to .95 lagging.
- Add FERC-approved non-pro-forma language to LGIA 9.6.1.2 and SGIA 1.8.1.2 adding same requirement for **existing units that upgrade**.
- Modify LGIA Appendix G to require existing PF requirements (i.e. at the Point of Interconnection) for GFs that have executed an IFSA as of the Effective Date of the OATT Revision 19-01 changes.



Order 842 – Proposed OATT Revisions

- Order 842 revised pro-forma LGIA and SGIA to require **NEWLY** interconnecting large/small Generating Facilities (GFs), **both Synchronous and Non-Synchronous**, to install and operate equipment capable of providing primary frequency response.
- Also revised LGIP, LGIA, SGIP, and SGIA to require **NEWLY** interconnecting Large/Small Electric Storage Resource (ESR) to meet certain requirements.
- **Proposed Revisions:**
- Modify LGIA 9.6.2.1 (Voltage Regulators), LGIA 9.6.4 (Primary Frequency Response), 9.6.4.1 (Governor), and 9.6.4.2 (Timely and Sustained Response) and add new SGIA 1.8.4 (Primary Frequency Response), to: require **NEWLY** interconnecting Large/Small GFs, both synchronous and non-synchronous to install a governor with:
 - 1) maximum 5% droop and maximum +/- 0.036Hz deadband, or
 - 2) implement relevant droop/deadband from an approved NERC Reliability Standard that provides for equivalent or more stringent parameters.



Order 842 – Proposed OATT Revisions (Cont'd)

- **Proposed Revisions (Cont'd):**
- Add new LGIA 9.6.4.3 and SGIA 1.8.4.3 (Exemptions) to exempt Generating Facilities regulated by Nuclear Regulatory Commission.
- Modify LGIP/SGIP Appendix 1/2 (Interconnection Request), add new LGIA 9.6.4.4 and SGIA 1.8.4.4 (Electric Storage Resources) to: require Interconnection Customer with an Electric Storage Resource (ESR) to establish an operating range that specifies the minimum/maximum state of charge between which the ESR will be required to provide primary frequency response, etc.



Other Proposed OATT Revisions

- Remove specific Power Factor language from Transmission Service Agreements
- Update Attachment C (Methodology to Assess Available Transfer Capability)
- Update Attachment J (Provisions Specific to the Transmission Provider)
- Miscellaneous revisions (e.g. Update name of OATT, OATT definitions, correct case of undefined and defined terms, update name of WAPA HQ Office, Correct hyperlinks, etc.)



WAPA OATT Filing – Other Proposed Revisions - Details

- Remove the following language from certain Transmission Service Agreements related to Power Factor requirements:
 - The Transmission Customer will be required to maintain a power factor between ___-percent lagging and ___-percent leading for all deliveries of capacity and energy to and from the Transmission Provider’s Transmission System.
- Specifically, in Attachment A “Long-Term Firm Point-to-Point” (Article 8), Attachment B “Non-Firm Point-to-Point” (Article 8), and Attachment F “Network Integration Transmission Service” (Article 7.0 of Specifications)
- Replace removed language with: “(To be filled in if applicable in accordance with Section 24.3 of the Tariff)



WAPA OATT Filing – Other Proposed Revisions - Details (Cont'd)

In Attachment C (Methodology to Assess Available Transfer Capability):

- Update language in “Processes for ensuring that non-firm capacity is released properly” section to reflect the following:
 - “The Transmission Provider calculates and releases the unused firm transmission capacity as non-firm transmission capacity immediately after the deadline for firm schedule submissions to account for firm transmission capacity which has not been scheduled (tagged).”
- Update language in first 2 sentences of “TRM Calculation Methodology” section to reflect RMR’s upcoming change to participate in the Northwest Power Pool Reserve Sharing Group:
 - “The Transmission Provider currently reserves TRM to support the activation of operating reserves internally or via participation in a Reserve Sharing Group, if applicable. The Transmission Provider’s obligation to deliver reserves is calculated pursuant to the requirements of the Transmission Provider or its applicable Reserve Sharing Group.”
- Correct minus signs in equations, update ATC Process Flow Diagram, correct case of several defined terms, remove reference to “WECC Operating Transfer Capability Planning Committee (OTCPC)” as that WECC committee no longer exists, remove references to specific powerflow software and undefined “Safe Harbor Tariff” term.



WAPA OATT Filing – Other Proposed Revisions - Details (Cont'd)

In Attachment J (Provisions Specific to the Transmission Provider):

- Update language in Section 13.0 “Costs Associated with United States Bureau of Reclamation and United States Army Corps of Engineers Interconnections” to include applicability to Interconnection Requests under the Small Generator Interconnection Procedures (SGIP) and associated Small Generator Interconnection Agreement (SGIA).
- Update language in Section 14.0 “Participant Funding” to include applicability to the SGIA.
- Update language in Section 16.0 “Environmental Compliance” to replace reference to “the LGIA” with “a Tariff agreement”.
- Correct the name of the Standard Large Generator Interconnection Procedures/Agreement (LGIP/LGIA).



WAPA OATT Filing – Other Proposed Revisions - Details (Cont'd)

- **Miscellaneous Revisions:**

- Change named of OATT from Open Access Transmission Service Tariff to Open Access Transmission Tariff.
- Add definition for “Tariff” and “OATT”
- Correct case for “curtail(ed)” and “interrupt(ed)”, as well as defined terms “Curtailment” and “Interruption”
- Correct case for “Federal law”, and defined term “Service Agreement”, where appropriate
- Specific “Section”/“Article” references capitalized throughout for consistency.
- Define TLR as “Transmission Loading Relief”
- Change old reference of WAPA’s “Corporate Services Office” to its current name of “Headquarters Office”
- Correct hyperlink in Section 2.1 of Attachment P
- Other general clean-up



OASIS Postings for OATT Revision

- Details and documents (**including the OATT Revision Redlines**) related to the proposed OATT Revision 19-01 are posted on the WAPA Regional Transmission Provider's OASIS sites at the following web link:
 - <http://www.oasis.oati.com/WAPA/WAPAdocs/WAPA-OATT-Revision-Information.htm>
- A summary of the Stakeholder comments and WAPA responses will be posted on the OASIS sites at the same web link.
- The final proposed OATT Revision 19-01 package will also be posted on the OASIS sites at the same web link.



Questions?

- Any questions can be directed to your specific WAPA OATT Regional Transmission Provider contact(s):
 - Desert Southwest Region (DSW): John Steward at 602-605-2774 (steward@wapa.gov);
 - Rocky Mountain Region (RMR) and Colorado River Storage Project (CRSP): Raymond Vojdani at 970-461-7379 (avojdani@wapa.gov);
 - Sierra Nevada Region (SNR): Ray Ward at 916-353-4766 (ward@wapa.gov);
 - Upper Great Plains Region (UGP): Steve Sanders at 406-255-2840 (sanders@wapa.gov)



Next Steps

- **Comments Due by September 16, 2019**
 - Submit written comments to tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around **October 4, 2019**
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around **October 25, 2019**
- WAPA Anticipates Filing to FERC on **December 13, 2019**
- Posting any required FINAL Business Practices by around **January 28, 2020**
- Effective Date of OATT Revision 19-01 on **February 11, 2020** (60 days after WAPA filing)



Mailing Address for Comments

Tariff Comments

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