



Western
Area Power
Administration

Proposed Revisions to WAPA's Open Access Transmission Tariff



OATT Revision 20-01 (CAISO EIM)

July 8, 2020

Stakeholder Meeting Presentation

Panel

- Steve Sanders, Operations & Transmission Advisor, UGP
- Ray Ward, Power Operations Advisor, SNR
- Ron Klinefelter, Assistant General Counsel & VP

Initial 06/01/20 OASIS Posting – Proposed OATT Revision 20-01

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

OATT Revision 20-01 (SNR participation in CAISO EIM) (ACTIVE) : (FAQs: [WAPA-Proposed-OATT-Revision-20-01-FAQs.pdf](#), Version: **06/01/2020)**

06/01/2020: Initial Notification of Proposed OATT Revision 20-01 (for CAISO EIM), Announcement of Stakeholder Meeting

“WAPA is proposing OATT revisions to address SNR's planned participation in the California Independent System Operator's Western Energy Imbalance Market (EIM) on or around April 1, 2021. See announcement here: [WAPA-Proposed-OATT-Revision-20-01-Announcement.pdf](#). WAPA is also providing notice via electronic mail to its customers/stakeholders.”

WAPA has posted an ***advance draft*** of the new proposed Attachment S, which includes key changes required for SNR's participation in the EIM at the following link:

[WAPA-OATT-Revision-20-01-OATT-Redline-Attachment-S-Version1--DRAFT.pdf](#) ;
Proposed new OATT Attachment S (*advance draft*)”



Initial 06/01/20 OASIS Posting – Proposed OATT Revision 20-01 (Cont'd)

“WAPA welcomes questions and comments related to the advance draft concepts, terms, and conditions of the proposed Attachment S. The advance draft Attachment S is subject to revision prior to posting the complete proposed OATT Revision 20-01 materials on or around June 29, 2020. The advance draft review period will not abbreviate the 30-day informal stakeholder comment period described below.

As part of WAPA's process to seek stakeholder comments on the proposed OATT revisions, WAPA will hold a Stakeholder Meeting on **July 8, 2020 at 10am MDT (via WebEx)** to present its proposed complete set of OATT revisions for SNR's participation in the EIM. WebEx information is here: [Webex Info](#). **WAPA's 30-day comment period will begin once WAPA posts its proposed complete set of OATT revisions on its Regional OASIS sites ahead of the July 8, 2020, Stakeholder 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.”



Other OASIS Postings and Stakeholder Notifications

- WAPA Public Affairs also issued an email notification to all customers/stakeholders informing them of the posting of the potential OATT Revision 20-01 on 06/01/2020.
- WAPA posted the proposed OATT Revision Redlines and Stakeholder Meeting Presentation on its OASIS sites on 07/01/2020. **That posting started the 30-day informal comment period.**
 - WAPA Public Affairs also issued an email notification to all customers/stakeholders informing them of the OASIS posting.



Other OASIS Postings and Stakeholder Notifications

- WAPA has posted notice on its www.wapa.gov website of:
 - The intent of the Sierra Nevada Region (SNR) to participate in the California Independent System Operator's Western Energy Imbalance Market (**EIM**) on April 1, 2021; and,
 - The intent of the Colorado River Storage Project (CRSP), Rocky Mountain Region (RMR), and Upper Great Plains Region (UGP) to participate in the Southwest Power Pool's (SPP) Western Energy Imbalance Service Market (WEIS Market) on February 1, 2021.
- Information regarding WAPA's plans for participation in the Western Interconnection Energy Imbalance Service Markets is available at the following URL: <https://www.wapa.gov/About/keytopics/Pages/energy-imbalance.aspx>



Other OASIS Postings and Stakeholder Notifications – Concurrent (but SEPARATE) OATT revision processes for EIM and the WEIS Market

- WAPA also posted notice on its OASIS that it started a concurrent OATT Revision 20-02 to address CRSP's and RMR's participation in the WEIS Market.
- A separate Stakeholder Meeting was held to present the proposed WEIS Market-related OATT revisions under OATT Revision 20-02 (on 06/22/2020).
- Comments related to OATT Revision 20-02 (WEIS Market) should be submitted under that process.
- **Only comments related to OATT Revision 20-01 (EIM) will be addressed in this OATT revision.**

****Please note that comments on the concurrent Rates and other processes to address SNR's participation in the EIM should be submitted under those relevant processes****



Background / Status on Previous WAPA OATT Filings

- As a reminder, all WAPA's previous filings are described and available 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 WAPA OATT Revision 20-01 – Revisions to Address SNR's participation in EIM

WAPA is proposing OATT revisions to address SNR's planned participation in the California Independent System Operator's Western Energy Imbalance Market (EIM) on or around April 1, 2021.

See announcement here: [WAPA-Proposed-OATT-Revision-20-01-Announcement.pdf](#).

Required key revisions include:

1. EIM Provisions, Coordination with BANC, EIM Settlements, EIM Administrative Service Schedule
2. Energy Imbalance Service and Generator Imbalance Service provided by EIM (updated Schedules 4 and 9 for SNR's participation in EIM)
3. Market transmission service to accommodate EIM energy transactions
4. Provisions to address EIM impacts to other existing provisions of the OATT



Deferral of Revisions for 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
- **WAPA plans to address these FERC Orders in subsequent OATT revision(s), as soon as possible, when ready.**



Deferral of Revisions for FERC Rulemaking Order 845

- WAPA needs to defer revisions with Order 845:
 - WAPA still needs to review the final pro-forma LGIP, LGIA, SGIP, and SGIA revisions from FERC to ensure no statutory/regulatory conflicts exist.
 - FERC has acted on several other TP's Order 845 compliance filings for the FERC directed TP "fill-in" provisions in recent FERC Open Meetings; however FERC has ordered additional compliance filings from several other TPs.
 - Once FERC's provides final direction, WAPA will review the implementation requirements for Order 845 and FERC's direction.
 - After WAPA completes its analyses and obtains input from affected stakeholders, WAPA intends to 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 Order 1000 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.
- The public utility Transmission Providers and the Coordinating Transmission Owners in WestConnect have reached a tentative agreement in principal to resolve the disagreement and made filings with the District Court noting the progress. WAPA is awaiting the filing and FERC response to the proposed changes to their OATTs to incorporate the agreement.



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 possible after it completes the necessary reviews and obtains input from affected stakeholders.



SNR EIM Participation Model

- SNR to participate in EIM as a Transmission Provider and a Sub-Balancing Authority Area (Sub-BAA) under BANC
 - BANC: Balancing Authority of Northern California
 - A Joint Powers Authority with no transmission or generation assets, and therefore no transmission tariff.
- BANC as SNR's BA will serve as EIM Entity for the BANC BAA
 - CAISO Tariff provides EIM Entity must be BA
 - Responsible party to interface with CAISO, which is the EIM Market Operator (MO)
 - Resource registration, manual interventions, settlements, etc.
- SNR's participation in EIM is dependent on the EIM implementation and participation decisions of BANC as the EIM Entity.
 - The provisions for SNR's EIM participation may evolve subject to modifications of the BANC EIM participation model.



SNR EIM Participation Model

- Given BANC does not have a tariff, BANC intends to implement EIM provisions through BANC Business Practices (BPs).
 - BANC BPs and EIM Participation Agreement (EIM PA) establish SNR obligations for EIM participation
- SNR is a Transmission Provider and therefore proposes OATT revisions for EIM participation
 - New Attachment S
 - Similar structure of FERC approved tariffs
 - Content modified to reflect:
 - SNR's limited role under BANC implementation model
 - WAPA OATT practices related to rates content
- SNR to employ EIM BPs to address EIM business practices, which are subject to development and evolution as BANC EIM participation and related BANC BPs evolve:
 - SNR EIM BPs will be posted under existing BP change control processes
 - EIM Settlements – draft BP-044 posted to WASN OASIS
 - EIM Operations – under development



WAPA OATT Revision 20-01 – Filing Proposal, Overview

- Revisions to main body of OATT:
 - Sections 15.7 and 28.5
 - Clarifies that applicable Real Power Loss factors are specified in the Service Agreements “... or on the Transmission Provider’s OASIS”. This change is generally applicable under the WAPA OATT.
 - Sections 16.1 and 28.1
 - References the EIM related new Attachment S as being applicable to Transmission and Network Customers in the EIM footprint for SNR.
 - Attachment K
 - Clarifies that Transmission Service provided under the OATT related to SNR’s participation in the EIM is solely in excess of the capability SNR requires for the delivery of long-term firm capacity and energy to SNR’s project use and electric service customers.
- New Attachment S:
 - Provisions for participation of WAPA’s Sierra Nevada Region (SNR) in California ISO’s (CAISO) Western Energy Imbalance Market (EIM).
 - Attachment S is not applicable for transactions occurring outside of SNR.
 - Allows for certain EIM related exceptions to OATT Main Body provisions
 - Includes new OATT Schedules for Energy Imbalance Service, Generator Imbalance Service, etc. as Addendums to Attachment S.
- Miscellaneous minor revisions (e.g. general clean-up, etc.)



WAPA OATT Revision 20-01 – Main Body, General Applicability Revisions

- Added language to last sentence in Section 15.7 (Under Point-to-Point Service):
 - The applicable Real Power Loss factors are specified in the Service Agreements “**or on the Transmission Provider’s OASIS**”.
- Added language to last sentence in Section 28.5 (Under Network Service):
 - The applicable Real Power Loss factors are specified in the Service Agreements “**or on the Transmission Provider’s OASIS**”.
- This OATT revision is generally applicable to all Regions using the WAPA OATT and clarifies current practice for the loss factors to be updated without requiring burdensome changes to Transmission Customers’ Service Agreements.



WAPA OATT Revision 20-01 – Main Body, EIM Related Revisions

- Added language in Section 16.1:
 - “(h) The Transmission Customer must comply with the California Independent System Operator’s Western Energy Imbalance Market (EIM) provisions in Attachment S, as applicable, when the Transmission Provider participates in the EIM as described in Attachment S.”
- Added language in Section 28.1:
 - “The Network Customer must comply with the EIM provisions in Attachment S, as applicable, when the Transmission Provider participates in the EIM as described in Attachment S.”



WAPA OATT Revision 20-01 – Main Body, EIM Related Revisions

- Added language in Sierra Nevada Region section of Attachment K:
 - “SNR participates in the California Independent System Operator’s (CAISO) Western Energy Imbalance Market (EIM) as a sub-Balancing Authority Area. Transmission Service provided under the Tariff related to SNR’s participation in the EIM, pursuant to Attachment S, is solely in excess of the capability SNR requires for the delivery of long-term firm capacity and energy to SNR’s project use and electric service customers.”



WAPA OATT Revision 20-01 – Attachment S, Overview

New Attachment S – Provisions

- Section 1 – Definitions
- Section 2 – General Provisions – Purpose and Effective Date (Applicability)
- Section 3 – Registration of EIM Participating Resources
- Section 4 – EIM Participating Resource Requirements
- Section 5 – Roles and Responsibilities
- Section 6 – Transmission Operations
- Section 7 – System Operations under Normal and Emergency Conditions
- Section 8 – Outages



WAPA OATT Revision 20-01 – Attachment S, Overview

New Attachment S – Provisions (Cont'd)

- Section 9 – EIM Settlements and Billing
- Section 10 – Compliance
- Section 11 – Market Contingencies
- Section 12 – EIM Disputes
- Addendum 1 – New Schedule 1S (EIM Administrative Service, Within SNR EIM Footprint)
- Addendum 2 – New Schedule 4S (Energy Imbalance Service, Within SNR EIM Footprint)
- Addendum 3 – New Schedule 9S (Generator Imbalance Service, Within SNR EIM Footprint)



WAPA OATT Revision 20-01 – Attachment S, Main Body Modifications

Main body OATT Provisions modified through Attachment S provisions:

- Section 2: “Notwithstanding the provisions of Section 10.2 of the Tariff, the standard of liability for the actions of the Transmission Provider performed consistent with this Attachment S shall be gross negligence or intentional wrongdoing.”
- Section 4.1: “Notwithstanding the limitations in Section 28.6 of the Tariff, Network Customers utilizing a Network Integration Transmission Service Agreement, and Native Load Customers, may participate in the EIM without a requirement to terminate the designation of any Network Resource that is an EIM Participating Resource consistent with Section 30.3 of the Tariff and without a requirement to reserve additional Point-To-Point Transmission Service for such transactions.”
- Section 4.1: “Notwithstanding the limitations in Sections 1.27, 30.1, 30.2, and 30.4 of the Tariff, Network Customers may also utilize Network Resources for purposes of fulfilling obligations under the EIM, such as generation Dispatch Instructions.”



WAPA OATT Revision 20-01 – Attachment S, Main Body Modifications

Main body OATT Provisions modified through Attachment S provisions (Cont'd):

- Section 9.3: “Notwithstanding the provisions of Section 3.4 of the Tariff, the rates and/or methodology related to Energy Imbalance Service when the Transmission Provider is participating in the EIM are described in Schedule 4S. Otherwise, such rates and/or methodology related to Energy Imbalance Service are described in Sections 3.4 of the Tariff.”
- Section 9.4: “Notwithstanding the provisions of Section 3.7 of the Tariff, the rates and/or methodology related to Generator Imbalance Service when the Transmission Provider is participating in the EIM are described in Schedule 9S. Otherwise, such rates and/or methodology related to Generator Imbalance Service are described in Section 3.7 of the Tariff.”



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 2 – General Provisions / Applicability:

- Attachment S shall be in effect for as long as Transmission Provider participates in EIM through the BANC EIM Entity and until all final settlements are finalized resulting from such implementation or termination.
- Attachment S shall apply to:
 - (1) Unless otherwise provided by a legacy agreement, all Transmission Customers and Interconnection Customers, as applicable, with new and existing service agreements under Parts II and III of the Tariff or Attachments L and M of this Tariff,
 - (2) All Transmission Customers with legacy agreements that pre-existed this Tariff and that expressly incorporate by reference the applicability of Transmission Provider's Tariff and/or this Attachment S in particular, and
 - (3) Transmission Provider's use of the transmission system for service to Native Load Customers, excluding statutory load obligations as defined under Attachment K.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 2 – General Provisions / Applicability (Cont'd):

- To the extent an Interconnection Customer controls the output of a generator located in Transmission Provider's Sub-BAA, the Transmission Provider may require the Interconnection Customer to comply with a requirement in this Attachment S that on its face applies to a Transmission Customer to the extent that the Transmission Provider makes a determination, in its sole discretion, that the Interconnection Customer is the more appropriate party to satisfy the requirements of Attachment S than any Transmission Customer.
- Transmission Customer duties and obligations related to the EIM are those identified in this Tariff, and those prescribed in business practices of the Transmission Provider and EIM Entity. The MO Tariff and EIM Entity business practice provisions for EIM Participating Resources and EIM Participating Resource Scheduling Coordinators shall apply to Transmission Customers with EIM Participating Resources.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 3 – Registration of EIM Participating Resources:

- All generation resources must register as EIM Participating Resources:

As required by the EIM Entity, Transmission Customers with resources in the Transmission Provider's Sub-BAA shall participate in the EIM as EIM Participating Resources under the terms and conditions defined in the EIM Entity business practices. Transmission Customers with an EIM Participating Resource must:

(1) Meet the requirements of this Attachment S, the EIM PA, as that agreement may be amended from time to time, and any successor or additional agreement(s) required by the EIM Entity. It shall be the obligation of the Transmission Customer to initiate registration for EIM Participating Resources, including initiating the EIM PA and additional agreements, with the EIM Entity, and to negotiate any necessary changes in such agreements, directly with the EIM Entity;

(2) Follow the related registration and certification process specified in this Attachment S, and any business practices and/or procedures of the Transmission Provider and EIM Entity.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 4 – EIM Participating Resource Requirements:

- The Transmission Customer that owns or controls a resource within the Transmission Provider’s Sub-BAA must have associated transmission rights on the Transmission Provider system based on one of the following:
 - (1) The resource is a designated Network Resource of a Network Customer and the Network Customer elects to participate in the EIM through its Network Integration Transmission Service Agreement; or
 - (2) The resource is associated with either (i) a Service Agreement for Firm Point-to-Point Transmission Service or (ii) a Service Agreement for Non-Firm Point-to-Point Transmission Service, and such Transmission Customer elects to participate in the EIM.
- Consistent provisions for external resources pseudo-tied into the Sub-BAA



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 4 – EIM Participating Resource Requirements (Cont'd):

- Registration of EIM Participating Resources shall be the responsibility of the Transmission Customer and shall be accomplished by the Transmission Customer in accordance with Section 3.
- All resources seeking interconnection to the Transmission Provider's Transmission System under Attachments L and M of the WAPA Tariff must be registered as EIM Participating Resources before initiating trial operations or commercial operations.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 4 – EIM Participating Resource Requirements (Cont'd):

- Resources within the Transmission Provider's Sub-BAA must be certified by the EIM Entity as EIM Participating Resources. Any costs incurred by the Transmission Provider due to an unregistered or non-certified resource shall be the sole responsibility of the Transmission Customer or Interconnection Customer associated with the resource.
- Transmission Customers with resources terminated from being EIM Participating Resources shall remain solely responsible for all EIM related costs and settlements incurred by the Transmission Provider associated with the resource. Transmission Customers shall notify the Transmission Provider immediately if such termination occurs.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 5 – Roles and Responsibilities:

- EIM Entity:
 - BANC performs the functions of the EIM Entity.
 - Transmission Customers should refer to the EIM Entity business practices for detailed information on the roles and responsibilities performed by the EIM Entity.
- Transmission Provider:
 - Coordinates with EIM Entity on implementation decisions affecting the Sub-BAA.
 - Develops EIM business practices for EIM implementation.
 - Takes corrective action to maintain reliability of the Sub-BAA, including Manual Dispatch as necessary.
 - Provides modeling, outage, and metering data as required by EIM Entity.
 - Responsible for day-to-day operations, including determination of EIM Transfer Capability.
 - Settles charges imposed on SNR due to EIM (Tier 1).



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 5 – Roles and Responsibilities (Cont'd):

- Transmission Customers:
 - Register and maintain data for EIM Participating Resources.
 - Provide planned and unplanned outage data for generation and customer owned transmission resources within the Sub-BAA.
 - Provide base schedules per EIM Entity requirements
 - Provide meter data per EIM Entity requirements
 - Settlement of EIM related charges



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 6 – Transmission Operations:

- The Transmission Provider facilitates the provision of transmission capacity for EIM Transfers by providing the EIM Entity and/or MO with information about the amounts of transmission capacity on the Transmission Provider’s Transmission System available for EIM Transfers utilizing Available Transfer Capability (ATC).
 - Submitted in accordance with the EIM Entity and Transmission Provider’s business practices.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 7 – System Operations:

- Participation in the EIM shall not modify, change, or otherwise alter:
 - the manner in which the Transmission Provider operates its Transmission System consistent with applicable reliability standards, including adjustments.
 - the obligations of the EIM Entity, Transmission Provider, or Transmission Customers to comply with applicable reliability standards.
- The Transmission Provider may take corrective action, including Manual Dispatch outside of market optimization for resources within the Sub-BAA, to address reliability / operational issues, or EIM Disruption.
 - Transmission Provider promptly reports actions taken in accordance with EIM Entity BPs



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 8 – Outages:

- The Transmission Provider communicates outage data regarding planned and unplanned outages (and derates) of transmission facilities, and EIM Participating Resources, located within the Transmission Provider’s Sub-BAA in accordance with the outage data provisions of the EIM Entity business practices and procedures, as those may develop and evolve over time.
- Outage submittals and updates required for:
 - Transmission Provider’s Transmission System
 - Transmission Customer owned transmission facilities
 - Transmission Customer EIM Participating Resources



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 9 – EIM Settlements and Billing:

- The Transmission Provider shall settle EIM related charges through the schedules in the addendums of Attachment S.
 - OATT Schedule 1S → Rate Schedule CV-EIM1S
 - OATT Schedule 4S → Rate Schedule CV-EIM4S
 - OATT Schedule 9S → Rate Schedule CV-EIM9S
- The Transmission Provider shall also develop and maintain business practices detailing the settlement allocation practices associated with EIM charges, as details of such settlement allocation practices are subject to evolution based on the settlement decisions and practices of the EIM Entity.
 - BP correlates charges to respective schedules above, and provides details of the settlement allocation methodology
- The Transmission Provider’s business practices for EIM settlements shall be posted on Transmission Provider’s OASIS. Revisions to the posted settlement practices shall be managed through public stakeholder processes.
 - See *DRAFT* BP-044 posted on WASN OASIS



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 9 – EIM Settlements and Billing (Cont'd):

- EIM Transmission Service:

Unless subsequently imposed by the MO as part of the MO Tariff and promulgated by WAPA through rate proceedings, there shall be no incremental transmission charge assessed for transmission use related to the EIM. Transmission Customers must have transmission service rights, as provided in Section 4.

- EIM Unreserved Use:

EIM Participating Resources within the Transmission Provider's Sub-BAA will not incur unreserved use charges solely as a result of EIM Dispatch Instruction. For uses that exceed the EIM Dispatch Instruction, the Transmission Provider will assess unreserved use in accordance with the Transmission Provider's business practices, and settle such charges under Schedule 10 of the Tariff. Any ancillary service charges that are applicable to Schedule 10 charges shall apply and shall include Schedules 1 and Schedule 1S of this Tariff.

- EIM Transmission Losses:

Transmission Customers shall be assessed real power losses against the Transmission Customer Base Schedule as a product of the applicable loss factors provided in Sections 15.7 and 28.5 of the Tariff, and in accordance with the Transmission Provider's business practices. Settlement of real power losses associated with EIM Energy Imbalance Service shall be pursuant to Schedule 4S of this Tariff, and settlement of Real Power Losses associated with EIM Generator Imbalance Service shall be pursuant to Schedule 9S of this Tariff.

- Incremental losses associated with EI/GI addressed through the marginal loss components of the market LAP/LMP



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 9 – EIM Settlements and Billing (Cont'd):

- **EIM Administrative Service:**

The Transmission Provider shall settle EIM administrative service costs with Transmission Customers through Schedule 1S. This settlement recovers the administrative costs for participation in the EIM by the Transmission Provider, including but not limited to such administrative charges as may be incurred by the Transmission Provider from the MO and/or EIM Entity.

- **EIM Energy Imbalance Service:**

Energy Imbalance Service settlements incurred by the Transmission Provider during EIM participation shall be settled with Transmission Customers through Schedule 4S. Charges may include:

- (1) Uninstructed Imbalance Energy (UIE)
- (2) Under-Scheduling Load
- (3) Over-Scheduling Load
- (4) Distribution of Under-Scheduling and Over-Scheduling Proceeds

- **EIM Generator Imbalance Service:**

Generator Imbalance Service settlements incurred by the Transmission Provider during EIM participation shall be settled with Transmission Customers through Schedule 9S. Charges may include:

- (1) Instructed Imbalance Energy (IIE)
- (2) Uninstructed Imbalance Energy (UIE)



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 9 – EIM Settlements and Billing (Cont'd):

- Other EIM Settlements:

All additional EIM related settlements incurred by the Transmission Provider shall be allocated to Transmission Customers through EIM rates in accordance with the Transmission Provider's business practices as posted on the Transmission Provider's OASIS. Such charges may include:

- (1) Unaccounted for Energy (UFE)
- (2) EIM Uplifts
- (3) Allocation of Operating Reserves

- MO Tax Liabilities:

Any charges to the Transmission Provider from the EIM Entity pursuant to the MO Tariff for MO tax liability as a result of the EIM shall be sub-allocated to those Transmission Customers triggering the tax liability.

- EIM Payment Calendar:

The Transmission Provider will follow the payment calendar established by the EIM Entity.

- Market Validation and Price Correction:

If the MO or EIM Entity modifies the Transmission Provider's EIM settlement statement in accordance with the MO's market validation and price correction procedures in the MO Tariff, the Transmission Provider may make corresponding or similar changes to the charges and payments sub-allocated under this Attachment S.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 10 – Compliance:

- Transmission Customers are responsible for:
 - Provision of Data:
 - Complying regarding information requests received directly from the EIM market monitor or regulatory authorities concerning EIM activities.
 - Providing all data necessary to respond to information requests received by the EIM Entity and/or the Transmission Provider from the MO, the EIM market monitor, or regulatory authorities concerning EIM activities.
 - Adhering to expected Rules of Conduct:
 - Compliance with Dispatch Instructions and operating orders.
 - Reasonable resource bid submissions.
 - Notification of outages in accordance with Section 8.
 - Providing complete, accurate, and timely meter data submission.
 - Settlement and billing consequences borne by the Transmission Customer.
 - Providing required information by the applicable deadlines and in accordance with established business practices.
 - Ensuring forecasts are accurate and based on all information that is known or should have been known at the time of submission.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 11 – Market Contingencies:

- EIM Suspension:
 - In the event of EIM suspension the Transmission Provider shall utilize Schedules 4, 9 (EI and GI, respectively) and Sections 15.7 and 28.5 (Real Power Losses) of the WAPA Tariff until the temporary suspension is no longer in effect, or for a period of time sufficient to process termination of the Transmission Provider or EIM Entity participation in the EIM.
 - Any EIM related service charges that continue to be incurred by the Transmission Provider during temporary suspension, as provided by the EIM Entity business practices, shall be settled in accordance with the applicable schedules of Attachment S.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 11 – Market Contingencies (Cont’d):

- Termination of EIM Participation:
 - The Transmission Provider shall notify Transmission Customers if notice of termination is submitted by either the Transmission Provider or EIM Entity¹
 - Attachment S shall terminate concurrently with such termination and in accordance with the provisions defined in Section 2.
 - If the Transmission Provider submits a notice of termination of its participation in the EIM, the Transmission Provider shall:
 - Provide the effective date of termination, and
 - Continue to provide EIM transmission service under Attachment S until such time that the termination is effective.
 - Transmission Customers shall remain obligated for settlement of any charges subsequent to notice of termination until all EIM related charges are finally settled by the MO, EIM Entity, and the Transmission Provider.

¹ Assumes no successor arrangements are implemented to allow for the Transmission Provider’s continued EIM participation.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 11 – Market Contingencies (Cont’d):

- Management of Contingencies and Emergencies :
 - The Transmission Provider may declare a temporary contingency and notify the EIM Entity to invoke corrective actions due to:
 - Operational circumstances causing or at risk of causing abnormal system conditions in the Sub-BAA, or to restore system ops to meet reliability criteria
 - Includes failure of EIM to produce feasible results
 - Disruption of communications impacting ability to submit/receive data from MO systems
 - Transmission Provider shall notify Transmission Customers if the above occurs resulting in corrective actions by the Transmission Provider or EIM Entity
 - Transmission Provider shall utilize Schedules 4, 9, and Sections 15.7 and 28.5 of the WAPA Tariff when corrective actions result in suspension of EIM settlement charges
 - Any EIM related service charges that continue to be incurred by the Transmission Provider during temporary suspension and/or contingency, as provided by the EIM Entity business practices, shall be settled in accordance with the applicable schedules of Attachment S.



WAPA OATT Revision 20-01 – Attachment S, Summary Provisions

Section 12 – EIM Disputes:

- Disputes Between the Transmission Provider and EIM Entity or Market Operator
 - Resolved in accordance with the processes specified in the Market Operator’s Tariff, EIM Participation Agreement, and EIM Entity business practices
- Disputes Related to Charges or Payments Allocated to the Transmission Provider from the EIM Entity
 - Addresses disputes between the Transmission Provider and a Transmission Customer or Interconnection Customer regarding the manner in which the Transmission Provider allocates charges or payments under the Tariff.
 - Shall follow the dispute resolution procedures in Sections 12.1 to 12.3 of the WAPA Tariff.
- Disputes Between Transmission Customers with EIM Participating Resources and the MO
 - Shall be resolved directly by the EIM Participating Resource Scheduling Coordinator



WAPA OATT Revision 20-01 – Attachment S, Schedules

Addendums 1/2/3 – Common Summary Provisions:

- Applicable only to SNR
- 1S/4S/9S apply when Transmission Provider is participating in the EIM and when the EIM has not been suspended.
- To the extent the Transmission Provider incurs EIM charges during periods of market suspension or contingency, as described in Section 11, Schedule 1S/4S/9S shall also apply to ensure the Transmission Provider remains revenue neutral for its participation in the EIM.



WAPA OATT Revision 20-01 – Attachment S, Schedules

Addendum 1 – Schedule 1S – EIM Administrative Service:

- Schedule 1S shall apply in addition to Schedule 1 of the WAPA Tariff
- EIM Administrative Service recovers the administrative costs for participation in the EIM by the Transmission Provider.
- Unless such charges are allocated to the Transmission Customer directly by the EIM Entity, all Transmission Customers purchasing Long Term Firm Point-to-Point Transmission Service, Short-Term Firm Point-to-Point Transmission Service, Non-Firm Point-to-Point Transmission Service, or Network Integration Transmission Service from the Transmission Provider shall be required to acquire EIM Administrative Service from the Transmission Provider.
- Proposed Rate Schedule CV-EIM1S



WAPA OATT Revision 20-01 – Attachment S, Schedules

Addendum 2 – Schedule 4S – Energy Imbalance Service:

- Energy Imbalance Service is provided when a difference occurs between the scheduled and the actual delivery of energy to a load located within the Transmission Provider’s Sub-BAA.
- Unless such charges are allocated to the Transmission Customer directly by the EIM Entity, a Transmission Customer shall be charged or paid for Energy Imbalance Service charges allocated to the Transmission Provider for its participation in the CAISO EIM, in accordance with the specific methodology for cost assessment set forth in the appropriate rate schedule attached to and made part of the applicable Service Agreement.
- Proposed Rate Schedule CV-EIM4S



WAPA OATT Revision 20-01 – Attachment S, Schedules

Addendum 3 – Schedule 9S – Generator Imbalance Service:

- Generally, Generator Imbalance Service is provided when a difference occurs between the output of a generator that is not an EIM Participating Resource located in the Transmission Provider's Sub-BAA, as reflected in the resource component of the Transmission Customer Base Schedule, and the delivery schedule from that generator to (1) another Balancing Authority Area (BAA), (2) the Balancing Authority of Northern California BAA, or (3) a load within the Transmission Provider's Sub-BAA.
- Unless such charges are allocated to the Transmission Customer directly by the EIM Entity, a Transmission Customer shall be charged or paid for Generator Imbalance Service charges allocated to the Transmission Provider for its participation in the EIM, in accordance with the specific methodology for cost assessment set forth in the appropriate rate schedule attached to and made part of the applicable Service Agreement.
 - Such charges may include those due to operational adjustments of any affected Interchange.
- Proposed Rate Schedule CV-EIM9S



WAPA OATT Revision 20-01 – Attachment S, Schedules

Addendum 3 – Schedule 9S – Generator Imbalance Service:

- **Applicability to Interconnection Customers:** To the extent the Interconnection Customer is a different entity than the Transmission Customer and controls the output of a generator located in the Transmission Provider's Sub-BAA, the Interconnection Customer may be subject to charges for Generator Imbalance Service (rather than the Transmission Customer) in accordance with this Schedule 9S.



OASIS Postings for OATT Revision 20-01 (EIM)

- Details and documents (**including the OATT Revision Redlines**) related to the proposed OATT Revision 20-01 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 20-01 package will also be posted on the OASIS sites at the same web link.



Next Steps

- **Comments Due by July 31, 2020**
 - Submit written comments by email to:
tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around **September 4, 2020**
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around **October 2, 2020**
- WAPA Anticipates Filing to FERC on **November 2, 2020**
- Posting any required FINAL Business Practices by around **December 14, 2020**
- Effective Date of OATT Revision 20-01 on **January 4, 2020** (60 days after WAPA filing)



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)



Mailing Address for Comments (if necessary)

Tariff Comments

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