



Western
Area Power
Administration

Proposed Revisions to WAPA's Open Access Transmission Tariff

OATT Revision 20-02 (WEIS Market)

June 22, 2020

Stakeholder Meeting Presentation

Panel

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

Initial 06/01/20 OASIS Posting - Proposed OATT Revision 20-02

Western Area Power Administration (WAPA)

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

OATT Revision 20-02 (CRSP/RMR participation in the SPP WEIS Market) (ACTIVE) : (FAQs: [WAPA-Proposed-OATT-Revision-20-02-FAQs.pdf](#))

06/01/2020: Initial Notification of Proposed OATT Revision 20-02 (for SPP WEIS Market), Announcement of Stakeholder Meeting:

“WAPA is proposing OATT revisions to address CRSP's and RMR's planned participation in the Southwest Power Pool (SPP) Western Energy Imbalance Service Market (WEIS Market) on or around February 1, 2021. See announcement here: [WAPA-Proposed-OATT-Revision-20-02-Announcement.pdf](#). WAPA is also providing notice via electronic mail to its customers/stakeholders.”



Initial 06/01/20 OASIS Posting - Potential OATT Revision 20-02 (Cont'd)

“As part of WAPA's process to seek stakeholder comments on the proposed OATT revisions, WAPA will hold a Stakeholder Meeting on **June 22, 2020 at 10am MDT (via WebEx)** to present its proposed OATT revisions for OATT Revision 20-02. WebEx information is here: [Webex Info](#). **WAPA's 30-day comment period will begin once WAPA posts its proposed OATT revisions on its Regional OASIS sites before the June 22, 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.

Additional details, including the meeting presentation and redlines of WAPA's proposed OATT revisions, will be posted on this page prior to the June 22, 2020 Stakeholder 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/stakeholders informing them of the posting of the potential OATT Revision 20-02 on 06/01/2020.
- WAPA posted the proposed OATT Revision Redlines and Stakeholder Meeting Presentation on its OASIS sites on 06/16/2020. **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 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; and,
 - 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.
- 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 WEIS Market and EIM

- WAPA also posted notice on its OASIS that it started a concurrent OATT Revision 20-01 to address SNR's participation in the EIM.
- A separate Stakeholder Meeting will be held to present the proposed EIM-related OATT revisions under OATT Revision 20-01.
- Comments related to OATT Revision 20-01 (EIM) should be submitted under that process.
- Only comments related to OATT Revision 20-02 (WEIS Market) will be addressed in this OATT revision.
 - Also, please note that comments on the concurrent Rates processes to address CRSP's and RMR's participation in the WEIS Market should be submitted under those processes.



WEIS Market, SPP's FERC Filing - Status

- Southwest Power Pool (SPP) has submitted its proposed WEIS Market filing to FERC, including the proposed Western Energy Imbalance Service Tariff (WEIS Tariff).
- The WEIS Tariff outlines the WEIS Market details, including settlement provisions for energy imbalance under the WEIS Market, market transmission service to be provided by TP's that are market participants, etc.
- FERC has not yet approved the WEIS Market filing and therefore provisions of that filing could change as this WAPA OATT revision process proceeds.



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 20-02 – Revisions to Address CRSP's and RMR's participation in WEIS Market

WAPA is proposing OATT revisions to address CRSP's and RMR's planned participation in the Southwest Power Pool (SPP) Western Energy Imbalance Service Market (WEIS Market) on or around February 1, 2021.

See announcement here: [WAPA-Proposed-OATT-Revision-20-02-Announcement.pdf](#).

Required key revisions include:

1. Energy Imbalance Service and Generator Imbalance Service provided by WEIS Market (updated Schedules 4 and 9 for WEIS Market)
2. New market transmission service to accommodate WEIS Market energy transactions
3. Provisions to address WEIS Market impacts to other existing provisions of the OATT



Overview of WAPA OATT Revision 20-02 – Revisions to Address CRSP’s and RMR’s participation in WEIS Market (Cont’d)

WAPA is not proposing revisions to WAPA’s OATT to address UGP’s planned participation in the WEIS Market.

- UGP has joined SPP as a Transmission Owner and UGP’s transmission facilities in the Western Interconnection that will be utilized for WEIS Market transactions are included under the SPP Open Access Transmission Tariff (SPP Tariff).
- UGP will coordinate with SPP on the necessary changes that are required to be made to the SPP Tariff to address UGP’s planned participation in the WEIS Market also on or around February 1, 2021.
- UGP expects that SPP will file such proposed changes to the SPP Tariff with FERC at least 60 days before February 1, 2021.



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.



Overview of WAPA OATT Revision 20-02 Filing Proposal

Revisions to main body of OATT:

- Sections 16.1 and 28.1 to reference the WEIS Market related new Attachment R as being applicable to Transmission and Network Customers in the WEIS Market footprint.
- Attachment K – Clarifying that Transmission Service provided under the OATT related to CRSP's and RMR's participation in the WEIS Market is solely in excess of the capability CRSP and RMR require for the delivery of long-term firm capacity and energy to CRSP's and RMR's project use and electric service customers.
- New Attachment R - Southwest Power Pool (SPP) Western Energy Imbalance Service Market (WEIS Market) Provisions, including new OATT Schedules for Energy Imbalance Service, Generator Imbalance Service, and market transmission service.
- Miscellaneous minor revisions (e.g. general clean-up, etc.)



Overview of WAPA OATT Revision 20-02 Filing Proposal (Cont'd)

New Attachment R – Provisions

- Section 1.0 – Definitions
- Section 2.0 – Applicability
- Section 3.0 – Tariff Provisions Modified by WEIS Market Participation
- Section 4.0 – Joint Dispatch Transmission Service (JDTS)
- Section 5.0 – Other Provisions (e.g. Unreserved Use)
- Addendum 1 – New Schedule 4R (Energy Imbalance Service, Within WEIS Market Footprint)
- Addendum 2 – New Schedule 8R (Joint Dispatch Transmission Service, For the WEIS Market)
- Addendum 3 – New Schedule 9R (Generator Imbalance Service, Within WEIS Market Footprint)



WAPA OATT Filing – WEIS Market related Revisions - Details

- Added language in Section 16.1:
 - “(g) The Transmission Customer must comply with the Southwest Power Pool Western Energy Imbalance Service Market (WEIS Market) provisions in Attachment R , as applicable, when the Transmission Provider participates in the WEIS Market as described in Attachment R.”
- Added language in Section 28.1:
 - “The Network Customer must comply with the WEIS Market provisions in Attachment R, as applicable, when the Transmission Provider participates in the WEIS Market as described in Attachment R.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

- Added language in Colorado River Storage Project Management Center section of Attachment K:
 - “CRSP MC participates in the Southwest Power Pool, Inc. (SPP) Western Energy Imbalance Service Market (WEIS Market). Transmission Service provided under the Tariff related to CRSP MC’s participation in the WEIS Market, pursuant to Attachment R, is solely in excess of the capability CRSP MC requires for the delivery of long-term firm capacity and energy to CRSP MC’s project use and electric service customers.”
- Added language in Rocky Mountain Region section of Attachment K: Section 28.1:
 - “RMR participates in the Southwest Power Pool, Inc. (SPP) Western Energy Imbalance Service Market (WEIS Market). Transmission Service provided under the Tariff related to RMR’s participation in the WEIS Market, pursuant to Attachment R, is solely in excess of the capability RMR requires for the delivery of long-term firm capacity and energy to RMR’s project use and electric service customers.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

- Added new Attachment R, which includes the “Southwest Power Pool (SPP) Western Energy Imbalance Service Market (WEIS Market) Provisions”
- OATT Schedules related to the WEIS Market are included as Addendums to Attachment R.
- Section 1.0 of Attachment R includes definitions applicable to Attachment R, including references to the SPP WEIS Tariff, Western Energy Imbalance Service provided under Schedule 1 of the WEIS Tariff, Joint Dispatch Transmission Service (or JDTS), etc.



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Section 2.0 of Attachment R (Applicability):

- “This Attachment R shall apply to the CRSP (CRCM) and/or RMR (LAPT) transmission facilities included in the Transmission System when CRSP and/or RMR are participating in the WEIS Market.

CRSP (CRCM) is the Transmission Provider for the CRSP transmission system within the WEIS Market Footprint. RMR (LAPT) is the Transmission Provider for the Loveland Area Projects (LAP) transmission system within the WEIS Market Footprint. The Western Area Colorado Missouri (WACM) Balancing Authority is in the WEIS Market Footprint. In the WEIS Market Footprint, RMR administers transmission services under the Tariff for the NERC registered Transmission Providers: CRCM and LAPT.”

- “This Attachment R applies to Transmission Customers in the CRSP (CRCM) and/or RMR (LAPT) transmission systems outlined above, when CRSP and/or RMR are participating in the WEIS Market.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Section 3.0 of Attachment R:

- “3.0 Tariff Provisions Modified by WEIS Market Participation: The following general provisions in the Tariff are modified for Transmission Customers in portions of the Transmission System described in this Attachment R when the Transmission Provider is participating in the WEIS Market:”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Section 3.0 of Attachment R (Cont’d):

- “3.1 Network Resources:

3.1.1 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 WEIS Market, such as WEIS Market generation dispatch instructions.

Notwithstanding the provisions in Section 28.6 of the Tariff, Transmission Customers may utilize JDTS for purposes of fulfilling obligations under the WEIS Market, such as WEIS Market generation dispatch instructions.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Section 3.0 of Attachment R (Cont’d):

- “3.2 Ancillary Services:

3.2.1 Notwithstanding the provisions in Sections 3.4 and 3.7 of the Tariff, where applicable, the rates and/or methodology related to Energy Imbalance Service and Generator Imbalance Service when CRSP and/or RMR are participating in the WEIS Market and the WEIS Market is providing such total ancillary services requirements for certain loads and generation within the Balancing Authority Area, are described in Schedules 4R and 9R, included in Addendums 1 and 3 to this Attachment R, respectively. When the WEIS Market is not providing such ancillary services, such rates and/or methodology related to Energy Imbalance Service and Generator Imbalance Service are described in Sections 3.4 and 3.7 of the Tariff, respectively.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Section 3.0 of Attachment R (Cont’d):

- “3.3 Real Power Losses:

3.3.1 Notwithstanding the provisions in Sections 15.7 and 28.5 of the Tariff, the requirements for replacing real power losses associated with the transmission service utilized for WEIS Market energy transactions are set forth in Section 4.0(i) of this Attachment R.”

- “3.4 Indemnification:

3.4.1 Notwithstanding the provisions in Section 10.2 of the Tariff, the standard of liability for the actions of the Transmission Provider performed consistent with this Attachment R shall be gross negligence or intentional wrongdoing.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

Section 4.0 of Attachment R:

Sets forth the terms and conditions for the new market transmission service called Joint Dispatch Transmission Service (JDTS), including:

- 4.0 (a) – Term (real-time intra-hour service)
- 4.0 (b) – Reservation Priority (non-firm, lowest priority)
- 4.0 (c) – Restrictions on the use of JDTS (For use for receipt of delivery of energy transactions under the WEIS Market)
- 4.0 (d) – Scheduling (Not required)
- 4.0 (e) – Curtailment (TP can curtail for reliability reasons)



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

Section 4.0 of Attachment R (Cont'd):

- 4.0 (f) – Transmission Provider's Limited Obligations to provide JDTS (e.g. no obligation to construct)
- 4.0 (g) – Procedures for Arranging JDTS (No reservation, application, or service agreement required)
- 4.0 (h) – Compensation for JDTS (Rates are provided in new Schedule 8R pursuant to WAPA's associated Rate Schedule, Currently no charge for JDTS)
- 4.0 (i) – Real Power Losses (No requirement to replacing real power losses associated with JDTS utilized for WEIS Market energy transactions)



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

Section 5.0 of Attachment R:

- “5.0 Other Provisions:

5.1 Unreserved Use: Unreserved Use will apply to the amount of actual metered generation in a Dispatch Interval, if any, which is in excess of the positive Operating Tolerance above a WEIS Market resource's average Setpoint Instruction over such Dispatch Interval in accordance with the Transmission Provider's business practices. Any ancillary service charges that are applicable to such Unreserved Use shall apply.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Addendum 1 of Attachment R (Schedule 4R):

OATT Schedule for Energy Imbalance Service (Within the WEIS Market).

Key provisions (Cont’d):

- “This Schedule 4R shall apply to the CRSP (CRCM) and/or RMR (LAPT) transmission facilities included in the applicable portions of the Transmission System when CRSP and/or RMR are participating in the SPP Western Energy Imbalance Service Market (WEIS Market) and the WEIS Market is providing such ancillary service to the Transmission Customer.”
- “Within the Balancing Authority Area(s) in the WEIS Market footprint, Energy Imbalance Service is provided when a difference occurs between the expected and the actual delivery of energy within such Balancing Authority Area(s) over a dispatch interval as defined in the SPP WEIS Tariff.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

Addendum 1 of Attachment R (Schedule 4R):

OATT Schedule for Energy Imbalance Service (Within the WEIS Market). Key provisions:

- “All loads in the WEIS Market will be subject to settlement in the WEIS Market. SPP, as the WEIS Market administrator, will obtain and provide this service under the WEIS Market and will calculate and bill applicable charges and credits.”
- “The Transmission Customer must either purchase this service from the Transmission Provider, purchase directly from SPP, as the WEIS Market administrator, or make comparable alternative arrangements, which may include arrangements with another entity participating in the WEIS Market who will purchase this service from the WEIS Market, or the use of non-generation resources capable of providing this service, to satisfy its Energy Imbalance Service obligation.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont'd)

Addendum 2 of Attachment R (Schedule 8R):

OATT Schedule for Joint Dispatch Transmission Service (For the WEIS Market). Key provisions:

- “This Schedule 8R shall apply to the CRSP (CRCM) and/or RMR (LAPT) transmission facilities included in the applicable portions of the Transmission System when CRSP and/or RMR are participating in the SPP Western Energy Imbalance Service Market (WEIS Market).”
- “The JDTS Customer shall compensate the Transmission Provider for JDTS pursuant to the Transmission System specific Joint Dispatch Transmission Service Rate Schedule attached to and made a part of the applicable Service Agreement.”
- The current Rate for JDTS will be \$0/MWh



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Addendum 3 of Attachment R (Schedule 9R):

OATT Schedule for Generator Imbalance Service (Within the WEIS Market).

Key provisions:

- “This Schedule 9R shall apply to the CRSP (CRCM) and/or RMR (LAPT) transmission facilities included in the applicable portions of the Transmission System when CRSP and/or RMR are participating in the SPP Western Energy Imbalance Service Market (WEIS Market) and the WEIS Market is providing such ancillary service to the Transmission Customer.”
- “Within the Balancing Authority Area(s) in the WEIS Market footprint, Generator Imbalance Service is provided when a difference occurs between the expected and the actual delivery of energy within such Balancing Authority Area(s) over a dispatch interval as defined in the SPP WEIS Tariff.”



WAPA OATT Filing – WEIS Market related Revisions – Details (Cont’d)

Addendum 3 of Attachment R (Schedule 9R):

OATT Schedule for Generator Imbalance Service (Within the WEIS Market).

Key provisions (Cont’d):

- “All resources in the WEIS Market will be subject to settlement in the WEIS Market. SPP, as the WEIS Market administrator, will obtain and provide this service under the WEIS Market and will calculate and bill applicable charges and credits.”
- “The Transmission Customer must either purchase this service from the Transmission Provider, purchase directly from SPP, as the WEIS Market administrator, or make comparable alternative arrangements, which may include arrangements with another entity participating in the WEIS Market who will purchase this service from the WEIS Market, or the use of non-generation resources capable of providing this service, to satisfy its Generator Imbalance Service obligation.”



OASIS Postings for OATT Revision 20-02 (WEIS Market)

- Details and documents (**including the OATT Revision Redlines**) related to the proposed OATT Revision 20-02 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 20-02 package will also be posted on the OASIS sites at the same web link.



Next Steps

- **Comments Due by July 16, 2020**
 - Submit written comments by email to:
tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around **August 14, 2020**
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around **September 11, 2020**
- WAPA Anticipates Filing to FERC on **October 1, 2020**
- Posting any required FINAL Business Practices by around **November 24, 2020**
- Effective Date of OATT Revision 20-02 on **December 1, 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

c/o Ronald J. Klinefelter

Assistant General Counsel & Vice President

Western Area Power Administration

Headquarters

12155 W. Alameda Parkway

P.O. Box 281213

Lakewood, CO 80228-8213

