

**Summary of Stakeholder Comments/Questions Received on the Western Area Power
Administration Proposed Revisions to its Open Access Transmission Service Tariff under OATT
Revision 21-01, and WAPA Responses**

Background:

Western Area Power Administration (WAPA) posted its proposed Open Access Transmission Tariff (OATT) revisions under OATT Revision 21-01 to address the Federal Energy Regulatory Commission's (FERC) Order No. 845 (*Reform of Generator Interconnection Procedures and Agreements*). WAPA posted the revisions on its Open Access Same-Time Information System (OASIS) websites on 5/13/2021. This posting began the 30-day Comment Period, which ended on 6/14/2021.

WAPA received the following comments from Stakeholders on the proposed OATT revisions during the Comment Period. WAPA has summarized the comments received and grouped similar comments below by topic along with corresponding WAPA responses. WAPA expresses its appreciation for the feedback from Stakeholders.

A) General/Procedural Comments:

1. **Comment:** Are the proposed <OATT> changes applied prospectively?

WAPA Response: Yes, the proposed OATT revisions will be applied prospectively, starting on the Effective Date of the OATT revisions, which will be posted on WAPA's OASIS sites.

2. **Comment:** There are multiple references to confidentiality agreements in the presentation. Does WAPA have a template non-disclosure agreement (NDA) form with provisions for disclosures in accordance with Freedom of Information Act (FOIA)? The Fixing America's Surface Transportation Act contained language related to public bodies but FERC hasn't acted on it yet. There is a proceeding before FERC in which this is an issue. Is the NDA form posted on WAPA's website?

WAPA Response: Yes, WAPA has a template NDA form that contains FOIA-related provisions, and the form is posted on WAPA's OASIS sites under the "Business Practices Common to all of WAPA's Regions" section. WAPA will provide the form directly to the

Commenter and the [link](#) to it.

B) Surplus Interconnection Service:

3. **Comment:** Regarding the Surplus Interconnection Service, when evaluating or measuring unneeded existing service, how is the variability of Central Valley Project (CVP) hydropower generation considered?

WAPA Response: The limit of the existing interconnection service will be based upon the Interconnection Service granted in the Large Generator Interconnection Agreement (LGIA), if available. In the case of legacy generating facilities installed prior to WAPA's OATT or Large Generator Interconnection Procedures that do not have currently executed LGIAs, such limit will be based upon other applicable documents that specify the legacy interconnection service (injection rights) limits. The treatment of legacy generating facilities will be described in the planned Business Practice for Surplus Interconnection Service that is being developed for this OATT revision. The ability, if any, for WAPA as the Transmission Provider (TP) to allow a Surplus Interconnection Service Customer to use injection rights for legacy WAPA generating facilities at the Federal dams (e.g. CVP hydropower generation) will be based upon agreement between the legacy generating facility injection rights administrator (likely WAPA's Merchant), WAPA as the TP, and the Surplus Interconnection Service Customer. WAPA's Merchant, in coordination with the Corps of Engineers or Bureau of Reclamation will determine if any existing interconnection service can or would be made available for Surplus Interconnection Service under the WAPA OATT, considering various factors including its marketing program limitations, variability of the hydropower generation, etc.

4. **Comment:** Is there a correlation between Surplus Interconnection Service and Conditional Firm Transmission service?

WAPA Response: No, Surplus Interconnection Service provides only for injection of a generating resource to WAPA's system and does not impact the requirement for Transmission Service to deliver such generation across WAPA's Transmission System. Therefore, there is no interaction between the Surplus Interconnection Service and the existing Conditional Firm Transmission Service under the WAPA OATT. Both types of these independent services are similar in the respect that they are both subject to additional limitations that impact the availability and maximum usage of such service.