Western Area Power Administration

# Proposed Revisions to WAPA's Open Access Transmission Tariff

## OATT Revision 21-01 (FERC Order 845)

May 24, 2021

Stakeholder Meeting Presentation

<u>Panel</u>

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

# Initial 04/30/21 OASIS Posting - Proposed OATT Revision 21-01 (*FERC Order 845*)

**04/30/2021 (NEW): Initial Notification of Planned OATT Revision 21-01 (for Order 845 - *Reform of Generator Interconnection Procedures and Agreements*), Announcement of Stakeholder Meeting on May 24, 2021**:

WAPA is evaluating OATT revisions to address FERC Order No. 845, Order No. 845-A and Order No. 845-B (Reform of Generator Interconnection Procedures and Agreements) - see Order 845 brief summary below. WAPA indicated it would proceed with these revisions during the prior OATT Revisions 20-01 and 20-02 processes and in its associated filings under FERC Docket Nos. NJ21-1-000 and NJ21-4-000. In addition, WAPA also plans to evaluate other minor OATT clean-up and maintenance revisions. See announcement here: WAPA-Proposed-OATT-Revision-21-01-Announcement.pdf. WAPA is also providing notice via electronic mail to its customers.

# Initial 04/30/21 OASIS Posting - Potential OATT Revision 21-01 (*FERC Order 845*) (Cont'd)

As part of WAPA's process to seek stakeholder comments on the proposed OATT revisions, WAPA will hold a Stakeholder Meeting on **May 24, 2021 at 10am MDT (via WebEx)** to present its proposed OATT revisions for OATT Revision 21-01. 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 May 24, 2021 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 May 24, 2021 Stakeholder Meeting. WAPA will also provide notice via electronic mail of these postings. Please direct questions/comments to your OATT Regional contact(s).

# Other OASIS Postings and Stakeholder Notifications

- WAPA Public Affairs (PA) also issued an email notification on 4/30/2021 to all customers/stakeholders informing them of the posting of the potential OATT Revision 21-01.
- WAPA posted the proposed OATT Revision Redlines and Stakeholder Meeting Presentation on its OASIS sites on 5/13/2021. **That posting started the 30-day informal comment period, which ends on June 14, 2021**.
  - WAPA PA also issued an email notification on 5/13/2021 to all customers/stakeholders informing them of the OASIS posting.

# FERC Rulemaking Order 845

- WAPA is proceeding with incorporating Order 845:
  - WAPA has completed its internal review the final ***pro forma*** LGIP and LGIA revisions from FERC to address any statutory/regulatory conflicts.
  - FERC has approved other TP's Order 845 compliance filings for the FERC directed TP "fill-in" provisions; therefore, WAPA now has clear feedback from FERC on their requirements for those "fill-in" provisions.
- These changes are required to retain WAPA's "safe harbor" (reciprocal) OATT status.
- Addresses WAPA's commitment to FERC in the previous filings for OATT Revision 20-01 (EIM) and 20-02 (WEIS) to begin this OATT after FERC orders on compliance filings by other TPs on Order 845 and/or internal WAPA review of impacts.

# 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 21-01 Filing – WAPA Approach

1. WAPA incorporates FERC's ***pro forma*** required provisions – generally without changes – unless there is a statutory reason that WAPA cannot include those in our OATT. In the case of statutory conflict, WAPA explains to FERC why it cannot include the ***pro forma*** provisions (e.g. funding limitations, environmental compliance requirements, conflicts with WAPA's regulations, etc.)
2. Except for additional WAPA **changes**, revisions are based upon previously approved FERC ***pro forma*** or other acceptable "**fill-in**" language to reduce the risk of a compliance Order from FERC.
3. Revisions are grouped in 3 Categories, with Redline Color Coding (Green, Blue, Purple), to clarify types of changes in WAPA filing and simplify stakeholder and FERC review.
    - ***Pro Forma* Revisions Directed by Order Nos. 845 and 845-A**
    - **Approved Revisions of Other Transmission Providers**
    - **Revisions Proposed by WAPA**

# Overview of WAPA OATT Revision 21-01 Filing – Scope of Order 845

- In Order 845 ("*Reform of Generator Interconnection Procedures and Agreements*", 4/19/2018):
  - FERC adopted ten (10) proposed reforms to the ***pro forma*** LGIP and LGIA for Transmission Providers (TPs):

1) To improve certainty for Interconnection Customer (IC) by:
   a) enabling an IC to exercise **option to build**, regardless of whether the TP can meet the IC's proposed construction dates; and
   b) imposing a **revised dispute resolution** requirement on all TPs.

# Overview of WAPA OATT Revision 21-01 Filing – Scope of Order 845 (Cont'd)

2) To promote more informed interconnection decisions by:

a) requiring all TPs to publish a **method for identifying contingent facilities**;

b) requiring TPs to offer **access to study processes and assumptions** for maintaining network models used;

c) altering the definition of "Generating Facility" in the LGIP and LGIA to **include electric storage resources**; and

d) requiring TPs to **post interconnection study reporting requirements on a quarterly basis**.

# Overview of WAPA OATT Revision 21-01 Filing – Scope of Order 845 (Cont'd)

3) To enhance the efficiency of the interconnection process by:

a) enabling ICs to request **interconnection service at a level lower** than their generating facility capacity;

b) requiring TPs to allow agreements for **provisional interconnection service** before completion of full process;

c) requiring TPs to develop an expedited process for ICs to use or transfer **surplus interconnection service**; and

d) requiring TPs to establish a procedure to assess if IC's **proposed technology** constitutes a material modification.

# Overview of WAPA OATT Revision 21-01 – Revisions to Address Order 845

See announcement here: WAPA-Proposed-OATT-Revision-21-01-Announcement.pdf.

FAQs: http://www.oasis.oati.com/WAPA/WAPAdocs/WAPA-Proposed-OATT-Revision-21-01-FAQs.pdf

Note: This OATT Revision is applicable to CRSP, DSW, RMR, and SNR Regional TPs. UGP is generally addressed under the Southwest Power Pool (SPP) Tariff due to its SPP Membership as noted in the WAPA OATT. SPP has already implemented Order 845.

# Overview of WAPA OATT Revision 21-01 – Revisions to Address Order 845 (Cont'd)

**WAPA's Proposed Order 845 Revisions – ONLY included in LGIP and LGIA**

1a) Option for the Interconnection Customer to Build Certain Facilities

1b) Non-binding Dispute Resolution

2a) Definition and Identification of Contingent Facilities

2b) Interconnection Study Models and Assumptions

2c) Definition of Generating Facility

2d) Interconnection Study Timeline Tracking and Reporting

3a) Requesting Interconnection Service below Generating Facility Capacity

3b) Provisional Interconnection Service

3c) Surplus Interconnection Service

3d) Generating Facility Technological Advancements

# Deferral of Revisions for Outstanding FERC Orders, Timeframes

- WAPA needs to continue to defer revisions associated with the following FERC Orders:
  - **Order 1000**, "*Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*"

- WAPA plans to address FERC Order 1000 in a subsequent OATT revision, <u>following</u> FERC's approval of a settlement agreement and OATT revisions for WestConnect public utility TPs.

# Deferral of Revisions for FERC Order 1000

- WAPA's DSW, RMR, and 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" (CTO).
- WAPA was prepared to incorporate revisions to Attachment P of its OATT to reflect such prior to public utility TPs in the WestConnect planning region filing notice with FERC indicating they may modify their filed OATT planning attachments to remove the FERC-approved CTO provisions.
- The public utility TPs and the CTOs in WestConnect have reached an agreement in principal to resolve the issue and continue to provide the District Court status updates. WAPA is awaiting the filing and FERC approval of the proposed changes to public utility TP OATTs incorporating the settlement agreement.

# Deferral of Revisions for FERC Order 1000 (Cont'd)

- The CTO provision is a key concept that allows non-public utility participants in the WestConnect planning region to…

  voluntarily contribute to—rather than automatically 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 final modifications to the WestConnect planning region documents will conflict with WAPA statutory requirements, and whether DSW, RMR, and SNR can continue to participate in the WestConnect planning region.

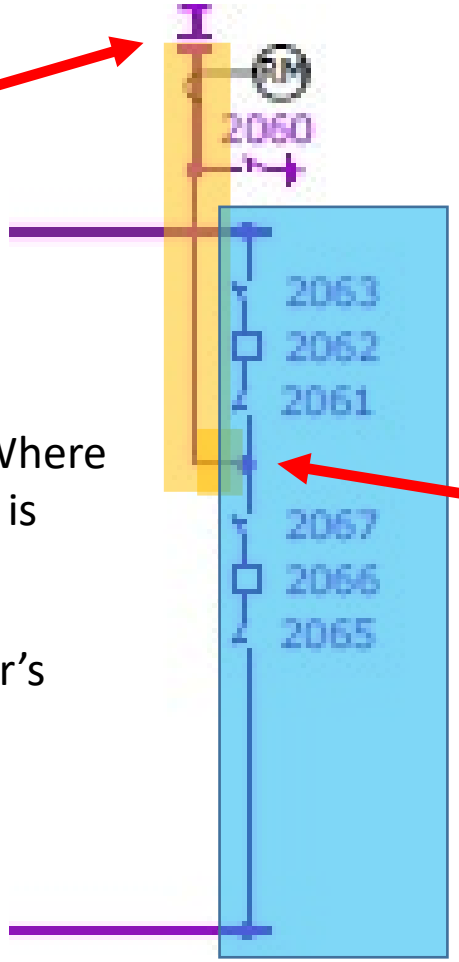
# Order 845 – OATT Revisions (1a)
## Option to Build – Summary

- Interconnection Customer (IC) has option to build the interconnection substation/facilities connected to WAPA's system in some situations – subject to WAPA's design requirements, specifications, review/approval.
- Specifically, under Order 845, IC has option to build the Stand Alone Network Upgrades (SANUs) and Transmission Provider's Interconnection Facilities (TPIFs)
- SANUs are those that need to be built and won't affect the day-to-day operations of WAPA's system during construction – WAPA identifies the SANUs, and the parties must agree to what constitutes those facilities.

# Order 845 – OATT Revisions (1a)

## Option to Build – SANUs/TPIFs

Point of Change of Ownership




Point of Interconnection (POI)

Network Upgrades (NU) – Where generally a NEW substation is considered "Stand Alone"

TPIF – Transmission Provider's Interconnection Facilities

# Order 845 – OATT Revisions (1a)
# Option to Build – OATT Revisions 1

**LGIP Section 1 and LGIA Article 1**

- Added ***pro forma*** language to the definition of Stand Alone Network Upgrades (SANUs) to provide that:
  - SANUs are Network Upgrades that are not part of an Affected System
    - IC's Option to Build under LGIA Article 5.1.3 does not apply to SANUs on Affected Systems
  - If there is a disagreement, the TP must provide the IC with a written technical explanation outlining why the TP does not consider a particular Network Upgrade to be a SANU

WAPA does not propose any changes to these ***pro forma*** revisions

# Order 845 – OATT Revisions (1a)
# Option to Build – OATT Revisions 2

**LGIA Articles 5.1, 5.1.3, 5.1.4, and 5.2**

- Revised LGIA Articles 5.1, 5.1.3, and 5.1.4 with **pro forma** changes to remove the limitation that the IC may only exercise the option to design, procure and construct the TPIFs and SANUs in instances when the TP cannot meet the dates proposed by the IC
- Added new ***pro forma*** LGIA Article 5.2(12), with revisions to conform to WAPA's requirements, providing that if the IC exercises LGIA Article 5.1.3 – Option to Build provision, the IC shall pay the TP to execute its responsibilities under that provision – Note: Advance payment to WAPA still applies

WAPA does not propose any changes to these ***pro forma*** revisions, except for LGIA Article 5.2(12)

# Order 845 – OATT Revisions (1b)
# Dispute Resolution – Summary

- Already included in LGIP Section 13.5-13.5.4, but currently arbitration only occurs by "mutual agreement" and only on a "non-binding" basis due to WAPA statutory restrictions (per our revision in 2007).
- WAPA's existing FERC-approved revisions to LGIP Section 13.5.3 provide that arbitration is ONLY non-binding on WAPA as a Federal agency pursuant to the Administrative Dispute Resolution Act (ADR Act) and due to the absence of Department of Energy regulations in this area.
- New under Order 845, FERC added a new LGIP Section 13.5.5 for Non-Binding Dispute Resolution Procedures, where FERC is clearly requiring now that either Party can unilaterally request non-binding dispute resolution. FERC also changed some of the timing requirements in that Section.

# Order 845 – OATT Revisions (1b)

## Dispute Resolution – OATT Revisions

**LGIP Section 13.5.5 - Non-binding Dispute Resolution**

- Added new ***pro forma*** LGIP Section 13.5.5 – Non-binding Dispute Resolution Procedures with revision to omit reference to 206 complaints, as WAPA is not subject to FERC jurisdiction under section 206 of the Federal Power Act.

# Order 845 – OATT Revisions (2a)
# Contingent Facilities – Summary

- IC's Interconnection Service may be dependent upon prior planned upgrades that impact the ability of their project to inject **IF** those upgrades are **not yet in service**.
- These prior planned upgrades (due to Planning Process, or required to address prior-queued GI requests, or upgrades to address IC's GI request) are included in the study models and assumptions used to evaluate the IC's GI request.
- IF the impactive prior planned upgrades aren't in service on time, IC's injection may need to be restudied and limited on an interim basis.
- Impactive study assumptions need to made clearer to allow ICs to understand the risk to their injection ability, including costs.
- FERC requires that these impactive prior planned upgrades **not yet in service** be identified up-front in the LGIA and has labeled them as "Contingent Facilities".

# Order 845 – OATT Revisions (2a)
# Contingent Facilities – OATT Revisions 1

**LGIP Section 1 and LGIA Article 1, and LGIA Appendix A (Definition)**:
New ***pro forma*** definition of Contingent Facilities, with two proposed revisions:

- Added "planned upgrades not yet in service" to types of facilities that if delayed or unbuilt could cause a need for re-studies
- Appended a sentence indicating Contingent Facilities are identified in LGIA Appendix A (added line item in Appendix A)

- **Contingent Facilities** shall mean those unbuilt Interconnection Facilities, ~~and~~ Network Upgrades, and/or planned upgrades not yet in service upon which the Interconnection Request's costs, timing, and study findings are dependent, and if delayed or not built, could cause a need for Re-Studies of the Interconnection Request or a reassessment of the Interconnection Facilities and/or Network Upgrades and/or costs and timing. Contingent Facilities are identified in Appendix A of the Standard Large Generator Interconnection Agreement.

# Order 845 – OATT Revisions (2a)

## Contingent Facilities – OATT Revisions 2

**New LGIP Section 3.8: Identification of Contingent Facilities (Summary)**

1. All additions, modifications, and upgrades to WAPA's Transmission System that are part of its transmission expansion plan, and Network Upgrades for prior-queued GI Requests that are **not yet in service**. Use Distribution Factor (DF) analysis/criteria to determine which of these facilities on WAPA's system constitute Contingent Facilities.

2. Also determine additional Contingent Facilities identified thru Affected System studies based upon Affected System's respective criteria.

3. TP will provide a list of all Contingent Facilities identified at the conclusion of the Interconnection SIS, and If requested, the estimated Interconnection Facility and/or Network Upgrade costs and estimated in-service completion time of each identified Contingent Facility when this information is readily available and not commercially sensitive. TP will also include such list in the LGIA.

# Order 845 – OATT Revisions (2a)
# Contingent Facilities – OATT Revisions 3

**New LGIP Section 3.8: Distribution Factor Analysis/Criteria:**

Contingent Facilities shall be identified from this list of facilities* that meet the following criteria:

a. Power Transfer Distribution Factor or Outage Transfer Distribution Factor ≥ 5%; or

b. MVA impact (Power Transfer Distribution Factor or Outage Transfer Distribution Factor multiplied by generator output of the Interconnection Request) ≥ 5MVA; or

c. MVA impact (Power Transfer Distribution Factor or Outage Transfer Distribution Factor multiplied by generator output of the Interconnection Request) ≥ 1% of the facility rating.

* On WAPA's system

# Order 845 – OATT Revisions (2b)
## Study Models – Summary

- WAPA has previously incorporated OATT provisions to "provide" modeling data and study assumptions used in Interconnection Studies to parties that request such information related to their intent to interconnect to WAPA's system.
- FERC now requires improved/comparable access for parties to this modeling information and is changing requirement. TPs shall now "maintain" such modeling data and study assumptions either directly on its OASIS or other a password-protected site.
- The Critical Energy Infrastructure Information (CEII) is still protected with Non-Disclosure Agreement (NDA) requirements prior to any party receiving such data.

# Order 845 – OATT Revisions (2b)
# Study Models – OATT Revisions 1

**LGIP Section 2.3 – Base Case Data (Summary)**

- TP shall maintain base power flow, short circuit and stability databases, including all underlying assumptions, and contingency list **on either** its OASIS site or a password-protected website
- TP shall maintain network models and underlying assumptions **on either** its OASIS site or a password-protected website, with such network models and underlying assumptions to reasonably represent those used during the most recent interconnection study
- TP shall provide a link on its OASIS site to the information if it is posted on a password-protected website

# Order 845 – OATT Revisions (2b)
# Study Models – OATT Revisions 2

**LGIP Section 2.3 – Base Case Data (Summary – Cont'd)**

- OASIS site users and password-protected website users must sign a confidentiality agreement before the release of commercially sensitive information or CEII in base case data
- ***Pro forma*** revised: "Such network models and underlying assumptions should reasonably represent those used during the most recent interconnection study for which the Interconnection Customer has a valid Interconnection Request and be representative of current system conditions with assumed higher queued generation and transmission additions."

# Order 845 – OATT Revisions (2c)
# GF Def, ESR, Etc. – Summary

- Electric Storage Resources (ESR) were previously included in prior WAPA OATT revisions. However, FERC had omitted ESR from the "Generating Facility" (GF) ***pro forma*** LGIP/LGIA definition and is correcting that in Order 845.
- Given the introduction of Surplus Interconnection Service in this OATT revision, and its associated new definitions, WAPA is making additional non-*pro forma* changes to the "Generating Facility" definition, so the LGIP and LGIA properly address Surplus Interconnection Service, if applicable.
- For consistency within certain revisions, WAPA is also including a new non-*pro forma* LGIP definition of "Interconnection Service Level" to reflect the maximum amount of injection requested by the IC at the POI.

# Order 845 – OATT Revisions (2c)
# GF Def, ESR, Etc. – OATT Revisions

- **Added *pro forma* language to the definition** of Generating Facility (GF), as follows:
  - "[GF] shall mean [IC]'s device for the production and/or storage for later injection of electricity identified in the Interconnection Request…"
  - Also added non-*pro forma* language: "or the Surplus Interconnection Service Request" and "Surplus Interconnection Service Customer"
- **Also added** "or Surplus Interconnection Service Customer's" to definition of Interconnection Facilities.
- **Added a new non-*pro forma* LGIP definition** for Interconnection Service Level, which is "the maximum amount of electrical output (MW) requested by the [IC] to be injected at the [POI]"
  - **Revised LGIP Sections 3.1, 3.2, 4.4.1, 4.4.2, 6.3, and 7.3** to substitute the new term for the undefined phrases "level of interconnection service," "level of Interconnection Service," and "Interconnection Service level" that are used interchangeably in these provisions.

# Order 845 – OATT Revisions (2d)
## Study Metrics – Summary

- WAPA has been posting quarterly study timing/completion metrics on OASIS for Transmission Service Requests (TSR) studies.
- FERC is now requiring similar study timing/completion performance metrics to be posted on OASIS for GI studies.
- **GI Metrics include**: Timing/completion performance for Interconnection Feasibility, System Impact, and Facilities Studies, and for GI requests withdrawn. **If** Study Metrics processing times (any for Feasibility, SIS, or IFS) are delayed for more than 25% of the studies, additional reporting requirements in LGIP Section 3.5.4 for next 4 consecutive Quarters until not exceeding 25% for 2 consecutive Quarters
- As with TSR metrics, WAPA will not file reports with FERC
- WAPA to post first set of quarterly metrics within 30 calendar days after the end of Q1 CY22

# Order 845 – OATT Revisions (2d)
## Study Metrics – OATT Revisions 1

- **New *pro forma* LGIP Sections 3.5.2, 3.5.2.1 through 3.5.2.4, 3.5.3, and 3.5.4**: Requiring the TP to calculate and maintain on its OASIS site or public website summary statistics related to the timing of the TP's processing of Interconnection Studies and to update those statistics on a quarterly basis
  - Replaced ***pro forma*** bracketed timeline placeholders in LGIP Sections 3.5.2.1-3.5.2.3 with the relevant Interconnection Study timelines
- **Revised LGIP Sections 3.5.2.3(A), (B), and (D)**: Revised to clarify when study provided in "draft" form, to reflect the similar requirement in LGIP Section 8.3.

# Order 845 – OATT Revisions (2d)

## Study Metrics – OATT Revisions 2

**3.5.2 Requirement to Post Interconnection Study Metrics.**

Transmission Provider will maintain on its OASIS or its website summary statistics related to processing Interconnection Studies pursuant to Interconnection Requests, updated quarterly. If Transmission Provider posts this information on its website, a link to the information must be provided on Transmission Provider's OASIS site. For each calendar quarter, Transmission Provider~~s~~ must calculate and post the information detailed in ~~s~~Sections 3.5.2.1 through 3.5.2.4.

- ***Pro-forma* Information required in Sections 3.5.2.1-3.5.2.4 includes:**
  - ***# of Studies completed***
  - ***# completed more than the standard time allowed (e.g. 45 days for Feasibility) (Actual times included.)***
  - ***# of On-going studies beyond***
  - ***Mean time (in days) that studies were completed***
  - ***% of studies exceeding the standard time allowed***
  - ***Details on Withdrawals***

# Order 845 – OATT Revisions (3a)
# IntServ < GenCap – Summary

- IC can request Interconnection Service at level < Generating Facility Capacity (where GF Capacity is defined as the Net capacity).
- The Gross GF Capacity has generally exceeded the Interconnection Service to account for Losses between the GF and the POI on the IC's radial system. In some cases, there was potential for the Net injection to exceed the Interconnection Service at the POI.
- Some ICs may be installing additional units to allow themselves to inject at their MAX Interconnection Service for more hours while taking units out for maintenance.

# Order 845 – OATT Revisions (3a)
## IntServ < GenCap – Summary

- ISSUE: When an IC has more Net GF Capacity than the Interconnection Service granted, this creates a situation where the power injection may exceed the Interconnection Service granted – and result in Reliability issues.
- Plant Power Controllers are typically installed to limit the Net GF injection (at the POI) to the Interconnection Service Limit (ISL). In some cases, it may also be necessary to install additional Protective equipment to trip the GF if the GF injection exceeds the, ISL. Operating Guides may also be required.

# Order 845 – OATT Revisions (3a)
# IntServ < GenCap – OATT Revisions 1

- **In LGIP Sections 3.1, 6.3, 7.3, and 8.2, and Section 5 of LGIP Appendix 1**: Added ***pro forma*** language that collectively provides for IC request and TP studies of Interconnection Service below the Generating Facility Capacity
- **In LGIP Section 3.1**: WAPA proposes revisions to the new ***pro forma*** language:
  - Replaced the first sentence: "Interconnection Customer may request an Interconnection Service Level below the Generating Facility Capacity."
  - Incorporated the proposed new term "Interconnection Service Level"
  - Omitted language that would have required WAPA to file an unexecuted LGIA if requested by the IC, because WAPA is not subject to FERC's filing requirements under FPA section 205
  - Appended a sentence specifying location of all the relevant LGIP provisions
- **In LGIP Section 3.1**: Also included the phrase "and associated costs"

# Order 845 – OATT Revisions (3b)
## Provisional Service – Summary

- IC can request "Provisional Interconnection Service" ahead of execution of the permanent LGIA. Also referred to as "limited Interconnection Service" because the IC wants reduced service available before its required Network Upgrades, Interconnection Facilities, Contingent Facilities, etc. are in service.
- "Limited Operation" was already in the OATT (LGIA Section 5.9) – Required TP to identify ability of IC to operate GF before TPIFs or Network Upgrades were completed. LGIA was in-place to allow for operation. Limited Operation section modified in this OATT revision to include Contingent Facilities.

# Order 845 – OATT Revisions (3b)
## Provisional Service – Summary (Cont'd)

- TP will need to review existing studies (or do additional studies, at IC's expense), to determine if it will ALLOW for such Provisional Service. Any additional studies also need to be updated as conditions change (annual check).
- IC and TP will need to execute an interim LGIA (Provisional LGIA) to document the Provisional Interconnection Service that will be in place until the permanent LGIA is executed. A standard LGIA will be modified as necessary (no *pro forma* to be added to OATT).

# Order 845 – OATT Revisions (3b)
# Provisional Service – OATT Revisions 1

- **LGIP Section 1 and LGIA Article 1**
  - Added the ***pro forma*** definitions of "Provisional Interconnection Service" and "Provisional LGIA" without any proposed revisions
- **LGIA Article 5.9**
  - Renamed title to "Other Interconnection Options"
- **LGIA Article 5.9.1 (Existing Limited Operations Section 5.9)**
  - Modified - If approved by TP, IC may also operate prior to the completion of Contingent Facilities
- **New LGIA Article 5.9.2 (Provisional Interconnection Service)**
  - Added ***pro forma*** language detailing the terms and conditions for Provisional Interconnection Service, with the following revisions:
    - Included Contingent Facilities in the types of facilities applicable
    - TP will update studies on an annual basis unless there have been no changes on TP's Transmission System since last completed study

# Order 845 – OATT Revisions (3c)
## Surplus Int. Service – Summary

- Surplus Interconnection Service is use of unneeded existing service at an existing POI by a new GF, granted on out of queue basis **IF** no new impacts identified.
- The concept is that a new GI wants to take advantage of an Existing IC's Int. Service at the Existing POI – when that Existing IC is not using it, IF that new GI doesn't have any new impacts to the transmission system. It can then SKIP the normal GI queue and be granted interconnection subject to limitations to coordinate with existing GF.

# Order 845 – OATT Revisions (3c)
## Surplus Int. Service – Summary (Cont'd)

- The study for the Surplus Service looks at any differences between the Existing GF performance and the new Surplus GF performance (e.g. difference between a Gas CT and say a Wind unit). Also, evaluate concurrent partial-service operation of both GFs, if allowed.
- Agreements are needed between TP, and the Existing GF and the Surplus GF parties.
- The Surplus GF injection is reduced/terminated as existing GF uses Int. Serv. Existing GF has priority, unless agreed to otherwise.

# Order 845 – OATT Revisions (3c)
## Surplus Int. Service – OATT Revisions 1

- **LGIP Section 1 and LGIA Article 1**
  - Added definitions: "Surplus Interconnection Service", "Surplus Interconnection Service Agreement", "Surplus Interconnection Service Customer", "Surplus Interconnection Service Facilities Study", "Surplus Interconnection Service Facilities Study Agreement", "Surplus Interconnection Service System Impact Study", "Surplus Interconnection Service System Impact Study Agreement", and "Surplus Interconnection Service Request"
- **New LGIP Section 3.3**

**3.3 Utilization of Surplus Interconnection Service.**

Transmission Provider's ~~must provide a~~ process ~~that~~ in this Section 3.3 allows an Interconnection Customer to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection. The original Interconnection Customer or one of its affiliates shall have priority to utilize Surplus Interconnection Service. If the existing Interconnection Customer or one of its affiliates does not exercise its priority, then that service may be made available to other potential Interconnection Customers.

# Order 845 – OATT Revisions (3c)
# Surplus Int. Service – OATT Revisions 2

**New LGIP Sections 3.3.1 through 3.3.5 (Summary)**

- As required by Order No. 845, WAPA's proposed Surplus Interconnection Service process:
  - Specifies that requests for Surplus Interconnection Service shall be processed outside of the interconnection queue
  - Allows affiliates of the existing IC to use Surplus Interconnection Service for another interconnecting Generating Facility
  - Allows for the transfer of Surplus Interconnection Service that the existing IC or one of its affiliates does not intend to use
  - Provides that if required, TP will perform the analyses described in ***pro forma*** LGIP Section 3.3.1

# Order 845 – OATT Revisions (3c)
# Surplus Int. Service – OATT Revisions 3

**New LGIP Sections 3.3.1 through 3.3.5 (Summary – Cont'd)**

- As required by Order 845, WAPA's proposed Surplus Interconnection Service process:
  - Requires the IC to stipulate the amount of Surplus Interconnection Service that is available, designate when Surplus Interconnection Service will be available, and describe any other conditions under which Surplus Interconnection Service at the POI may be used
  - States that the original IC, the Surplus Interconnection Service Customer, and TP will enter into agreements for Surplus Interconnection Service
  - Provides that **if** any additional Network Upgrades are identified as being required for Surplus Interconnection Service, the request will be denied, and the Requesting Customer may submit a new Interconnection Request

# Order 845 – OATT Revisions (3c)
## Surplus Int. Service – OATT Revisions 4

- **Added LGIP Section 3.3.6** to incorporate several additional requirements and clarifications for Surplus Interconnection Service
  - WAPA's proposed requirements and clarifications reflect those either stated in Orders 845 and 845-A or approved by FERC, as follows:
    - Section 3.3.6.1 – Order No. 845 at P 481
    - Section 3.3.6.2 – Order No. 845 at P 472 and n. 835
    - Section 3.3.6.3 – EPE LGIP Section 3.3.2.G
    - Section 3.3.6.4 – Order No. 845 at P 473-474 and 504-507
    - Section 3.3.6.5 – Order No. 845 at P 472; Order No. 845-A at P 145
    - Section 3.3.6.6 – Order No. 845 at P 472, 475, and 481
    - Section 3.3.6.7 – EPE LGIP Section 3.3.2.F

# Order 845 – OATT Revisions (3d)
# Technology Changes – Summary

- Permissible Technological Advancement (PTA) is an additional Modification to the Interconnection Request allowed for Large GI requests (> 20 MW) **IF** they don't create a Material Modification. IC can request the TP to evaluate these PTAs for acceptability.
- PTAs cannot include changes in generation technology type or fuel type.
- Scope of PTAs outlined in new PTA Definition.
- IC can request a PTA prior to execution of IFacS Agreement, without risk of losing queue position.
- TP may need to do additional studies, at IC's expense, to evaluate requested PTAs. Study report to be provided if changes are not permissible.

# Order 845 – OATT Revisions (3d)
# Technology Changes – OATT Revisions 1

**LGIP Section 1 (Summary)** – In accordance with Order 845's pertinent requirements and clarifications, added non-*pro forma* term "Permissible Technological Advancement" as modification to equipment that:

- Results in electrical performance that is equal to or better than the electrical performance expected prior to the technology change
- Does not cause any reliability concerns
- Does not degrade the electrical characteristics of the generating equipment, e.g., the ratings, impedances, efficiencies, capabilities, and performance of the equipment under steady-state and dynamic conditions

# Order 845 – OATT Revisions (3d)
# Technology Changes – OATT Revisions 2

**LGIP Section 1 (Summary, Cont'd)**

- Does not have a material impact on the cost or timing of any Interconnection Request with a later queue priority date, and is therefore not a Material Modification
- May achieve cost or grid performance efficiencies
- May include turbines, inverters, plant supervisory controls or other devices that could affect a generating facility's ability to provide ancillary services
- Does not include changes in generation technology type or fuel type, e.g., wind to solar or natural gas to wind

# Order 845 – OATT Revisions (3d)
# Technology Changes – OATT Revisions 3

**LGIP Sections 4.4.1 and 4.4.2** – Added ***pro forma*** language along with the following proposed revisions:

- **Revised LGIP Section 4.4.1** to state: "(a) a decrease of up to 60 percent of electrical output (MW) of the proposed project , through either (1) a decrease in ~~plant size~~ Generating Facility Capacity (MW)"
- **Revised LGIP Section 4.4.2** to state: "additional ~~15 percent~~ decrease of up to 15 percent of electrical output of the proposed project through either (1) a decrease in ~~plant size~~ Generating Facility Capacity (MW)"
- Moved the phrase "the incremental costs associated with those modifications are the responsibility of the requesting Interconnection Customer" **from existing LGIP Section 4.4.2(b) to a separate sentence after new Section 4.4.2(c)**, to remedy the implication that the IC is responsible only for incremental costs associated with Section 4.4.2(b)

# Order 845 – OATT Revisions (3d)
# Technology Changes – OATT Revisions 4

**New LGIP Section 4.4.6 (Summary)** – Added non-*pro forma* language specifying a technological change procedure for WAPA to assess and, if necessary, study an IC's proposed technological changes

- Allows IC to incorporate certain technological advancements prior to the execution of the Interconnection Facilities Study Agreement, without risking the loss of its queue position
- States that if an IC seeks to incorporate a technological advancement, the IC must submit a technological advancement request
- Specifies the information that the IC must submit as part of its technological advancement request
- Specifies what technological advancements can be incorporated at various stages of the process and which requirements apply to the IC/TP

# WAPA OATT Filing – Other OATT Revisions - Details

**Revisions to LGIP Appendix 1 (Request Application):**

- Added line items to Section 2 for the IC to indicate whether an Interconnection Request is related to a:
  - Permissible Technological Advancement,
  - Provisional Interconnection Service, or
  - Surplus Interconnection Service, and
  - to provide additional information regarding the two services if they are requested
- Revised Section 5 to indicate that the IC or the applicant for Surplus Interconnection Service is to provide the required information for:
  - a proposed new Generating Facility (GF), incl. Int. Cap. requested IF less than GF Capacity
  - an increase to GF Capacity or a Material Modification of an existing GF,
  - for Provisional Interconnection Service related to an existing Interconnection Request or Interconnection Agreement, or
  - for the GF that plans to utilize the Surplus Interconnection Service

# OASIS Postings for OATT Revision 21-01 (Order 845)

- Details and documents (including the OATT Revision Redlines) related to the proposed OATT Revision 21-01 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 21-01 package will also be posted on the OASIS sites at the same web link.

# Next Steps

- Stakeholder Comments Due by **June 14, 2021**
  - Submit written comments by email to: tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around **July 30, 2021**
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around **August 16, 2021**
- WAPA Anticipates Filing to FERC on **October 15, 2021**
- Posting any required FINAL Business Practices* by around **December 1, 2021**
- Effective Date of OATT Revision 21-01 on **December 15, 2021** (60 days after WAPA filing)

* BPs likely include Option to Build, Contingent Facilities, Access to Study Models, Int. Service < Gen. Capacity, Provisional Service, Surplus Int. Service.

# 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): Ira Witherspoon at 916-353-4659 (withersp@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

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