

Summary of Stakeholder Comments/Questions Received on Western Area Power Administration's Proposed Revisions to its Open Access Transmission Tariff under OATT Revision 22-01, and WAPA Responses

Background:

Western Area Power Administration (WAPA) posted its proposed Open Access Transmission Tariff (OATT) revisions under OATT Revision 22-01 to address the Desert Southwest Region's (DSW) planned participation in the California Independent System Operator's (CAISO) Western Energy Imbalance Market (EIM). WAPA posted the revisions on its Open Access Same-Time Information Systems (OASIS) on 7/01/2022. That OASIS posting began the 30-day Comment Period, which ended on 8/01/2022.

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

WAPA expresses its appreciation for the participation and feedback from Stakeholders.

A) Comments related to Specific OATT Sections:

1. **Comment:** Does the description of service covered in Attachment K also include any existing transmission contracts that DSW may have with the Colorado River Storage Project Management Center (CRSP MC) to facilitate CRSP MC deliveries?

WAPA Response: The EIM only utilizes available transmission on a non-firm intra-hour basis for real-time market dispatch that is not needed or utilized to meet other DSW OATT-related commitments. Existing DSW transmission service contracts are not impacted by the allowed non-firm intra-hour use by the EIM of the DSW transmission system for energy imbalance deliveries.

B) Other Comments:

1. **Comment:** Does DSW plan to change its North American Electric Reliability Corporation (NERC) Reliability Coordinator (RC), which is currently the Southwest Power Pool, Inc. (SPP) RC, due to its participation in the EIM? It is recommended that DSW contact other

utilities to discuss its approach and consider whether any OATT revisions will be needed if their RC is changed.

WAPA Response: DSW does not have any plans to change its current SPP RC and doesn't believe it is necessary to change its RC to participate in the EIM. DSW is currently working with the CAISO RC and SPP RC to avoid any duplicating processes and prevent any possible conflicts. If needed, DSW would evaluate a change in its RC in the future. DSW has also held conversations with other utilities in similar situations and has not identified any RC-related conflicts that would occur as a result of its EIM participation.

WAPA historically has not identified the need to modify its OATT due to a change in RC. For example, WAPA did not make any OATT revisions for the transition from the Peak RC to the SPP RC in the Western Interconnection in December 2019 for the CRSP MC, DSW, Rocky Mountain, or Upper Great Plains Regional Offices.