

Proposed Revisions to WAPA's Open Access Transmission Tariff (OATT)

OATT Revision 22-01 (DSW EIM)

July 14, 2022

Stakeholder Meeting Presentation

Panel

- Steve Sanders, Industry Restructuring Advisor, UGP
- Ron Klinefelter, General Counsel & Senior VP
- John Steward, Transmission Business Unit Manager, RMR/DSW/CRSP
- Bob Kennedy, Open Access Services Compliance Advisor
- John Paulsen, Supervisory Energy Management and Marketing Specialist, DSW



Initial 6/2/2022 OASIS Posting – Proposed OATT Revision 22-01 (DSW EIM)

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

OATT Revision 22-01 (**Active**) (DSW participation in CAISO EIM) : (FAQs: [WAPA-Proposed-OATT-Revision-22-01-FAQs.pdf](#), Version: 06/02/2022))

“06/02/2022: Initial Notification of OATT Revision 22-01 (DSW participation in CAISO EIM), Announcement of Stakeholder Meeting on July 14, 2022:

WAPA has posted notice on its www.wapa.gov website of: (1) the intent of the Desert Southwest Region (DSW) to participate in the the California Independent System Operator's (CAISO) Western Energy Imbalance Market (EIM). Information regarding DSW's plans for participation in the CAISO EIM is available at the following URL: <https://www.wapa.gov/regions/DSW/Pages/DSW-EIM.aspx>.

WAPA is proposing OATT revisions to address DSW's planned participation in the CAISO EIM on or around April 5, 2023. See announcement here: [WAPA-Proposed-OATT-Revision-22-01-Announcement.pdf](#). WAPA is also providing notice via electronic mail to its customers/stakeholders.”



Initial 6/2/2022 OASIS Posting – Proposed OATT Revision 22-01 (DSW EIM) (Cont'd)

“As part of WAPA's process to seek stakeholder comments on the proposed OATT revisions, WAPA will hold a Stakeholder Meeting on **July 14, 2022 at 10am MDT/9am Arizona Time (via WebEx)** to present its proposed complete set of OATT revisions for OATT Revision 22-01 for DSW'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 on or about July 1, 2022, ahead of the July 14, 2022, 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 July 14, 2022, Stakeholder Meeting. WAPA will also provide notice via electronic mail of these postings, as needed.”



Other OASIS and WAPA Webpage 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 22-01 on 6/2/2022.
- WAPA posted the proposed OATT Revision Redline and Stakeholder Meeting Presentation on its Regional Transmission Provider's Open Access Same-Time Information Systems (OASIS) sites on 7/1/2022 and 7/7/2022 respectively. **The OATT Revision Redline posting on OASIS started the 30-day informal comment period, which ends on August 1, 2022.**
 - WAPA Public Affairs also issued an email notification to all customers/stakeholders informing them of the OASIS posting of the OATT Revision Redline.
- General information on participation by WAPA in Western Interconnection energy imbalance service markets is available at: [WAPA and Markets](#).



WAPA OATT Postings, Background / Status on Previous WAPA OATT Filings/Revisions

- As a reminder, all WAPA's previous filings with the Federal Energy Regulatory Commission (FERC) are described and available on WAPA's Regional Transmission Provider's OASIS sites under the WAPA OATT Documents page at: [WAPA-Tariff-Docs](#)
- All information related to this OATT Revision 22-01 is available on WAPA's OASIS sites at: [WAPA OATT Revision\(s\) Status & Postings](#)
- All information related to recently completed WAPA OATT revisions is available on WAPA's OASIS sites at: [Prior-WAPA-OATT-Revisions](#)



Overview of WAPA OATT Revision 22-01 – Revisions to Address DSW's participation in EIM

WAPA is proposing OATT revisions to address DSW's planned participation in the California Independent System Operator's Western Energy Imbalance Market (EIM) on or around April 5, 2023.

See announcement here: [WAPA-Proposed-OATT-Revision-22-01-Announcement.pdf](#).

Key revisions to address DSW's participation in the EIM include (primarily a new Attachment T to WAPA's OATT):

1. General Provisions, Roles and Responsibilities, Transmission Operations, and EIM Settlements and Billing
2. Energy Imbalance Service and Generator Imbalance Service provided by EIM (new Schedules 4T and 9T)
3. Market transmission service to accommodate EIM energy transactions
4. Provisions to address EIM impacts to other existing provisions of the OATT

Note: The OATT revisions proposed to address DSW's participation in the EIM are applicable only to the DSW transmission footprint and are completely separate from the previously added OATT revisions to address SNR's participation in the EIM (under Attachment S of the WAPA OATT).



Deferral of Revisions for Outstanding FERC Orders, Plans

- WAPA needs to continue to defer revisions associated with the following outstanding FERC Orders to subsequent WAPA OATT revisions:
 - **Order 1000**, *“Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities”*
 - **Order 676-I/J**, NAESB WEQ Version 3.3 Standards changes
 - **Order 881**, *“Managing Transmission Line Ratings”* (Ambient-Adjusted Ratings)
- These changes are required to retain WAPA’s “safe harbor” (reciprocal) OATT status by FERC.

WAPA plans to address these FERC Orders as soon as possible in subsequent OATT revision(s), when ready.



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 to resolve the issue and have filed a settlement with FERC outlining the agreed upon terms and conditions between the parties. In the meantime, the District Court has moved forward with the proceeding in the 5th Circuit. The parties have submitted various briefs in the proceeding. Consequently, there is currently no final resolution of both proceedings. Therefore, WAPA continues to await FERC approval of the proposed changes to public utility TP OATTs incorporating the settlement agreement and is hopeful FERC approval of the new tariff amendments will resolve the litigation in the 5th Circuit.



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.



DSW EIM Participation Model

- DSW to participate in EIM as a Transmission Provider and as the Western Area Lower Colorado (WALC) Balancing Authority Area (BAA)
- DSW will serve as EIM Entity for the WALC 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.
- In addition to WAPA's OATT, DSW intends to implement/clarify EIM provisions through Business Practices (BPs).



DSW EIM Participation Model (Cont'd)

- DSW is a Transmission Provider and therefore proposes OATT revisions for EIM participation
 - New Attachment T
 - Similar structure of FERC approved tariffs
 - Content modified to reflect:
 - WAPA OATT practices related to establishing or adjusting rates
- DSW to employ EIM BPs (proposed and posted under existing BP changes control processes on DSW OASIS) to address any necessary EIM business practices in the following potential areas:
 - EIM Settlements
 - EIM Operations



WAPA OATT Revision 22-01: Filing Proposal, Overview

- Revisions to main body of OATT:
 - Sections 16.1 and 28.1
 - References the EIM related new Attachment T as being applicable to Transmission and Network Customers in the EIM footprint for DSW.
 - Attachment K
 - Clarifies that Transmission Service provided under the OATT related to DSW's participation in the EIM is solely in excess of the capability DSW requires for the delivery of long-term firm capacity and energy to DSW's project use and electric service customers.
- New Attachment T:
 - Provisions for participation of WAPA's Desert Southwest Region (*Referred to as "DSR" in WAPA OATT*) in California ISO's (CAISO) Western Energy Imbalance Market (EIM).
 - Attachment T is **not** applicable for transactions occurring outside of DSR.
 - 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 T.
- Miscellaneous minor revisions (e.g., general clean-up, etc.)



WAPA OATT Revision 22-01:

Main Body, DSW EIM Related Revisions

- Revised 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 Attachments S or I, as applicable, when the Transmission Provider participates in the EIM as described in Attachments S or I.”
- Revised language in Section 28.1:
 - “The Network Customer must comply with the EIM provisions in Attachments S or I, as applicable, when the Transmission Provider participates in the EIM as described in Attachments S or I.”



WAPA OATT Revision 22-01: Main Body, DSW EIM Related Revisions (Cont'd)

- Added language in Desert Southwest Region section of Attachment K (where DSW is referred to as “DSR” in the WAPA OATT):
 - “DSR participates in the California Independent System Operator’s (CAISO) Western Energy Imbalance Market (EIM) as a Balancing Authority Area. Transmission Service provided under the Tariff related to DSR’s participation in the EIM, pursuant to Attachment T, is solely in excess of the capability DSR requires for the delivery of long-term firm capacity and energy to DSR’s project use and electric service customers.”



WAPA OATT Revision 22-01: Attachment T, Overview

New Attachment T – Provisions

- Section 1 – Definitions
- Section 2 – General Provisions – Purpose and Effective Date (Applicability)
- Section 3 – Election of Transmission Customers to become WAPA EIM Participating Resources
- Section 4 – Eligibility to be a WAPA EIM Participating Resource
- Section 5 – Roles and Responsibilities
- Section 6 – Transmission Operations
- Section 7 – System Operations under Normal and Emergency Conditions
- Section 8 – Outages



WAPA OATT Revision 22-01: Attachment T, Overview (Cont'd)

New Attachment T – Provisions (Cont'd)

- Section 9 – EIM Settlements and Billing
- Section 10 – Compliance
- Section 11 – Market Contingencies
- Addendum 1 – Schedule 1T (EIM Administrative Service)*
- Addendum 2 – Schedule 4T (EIM Energy Imbalance Service)*
- Addendum 3 – Schedule 9T (EIM Generator Imbalance Service)*



* Within DSW EIM Footprint

WAPA OATT Revision 22-01: Attachment T, Main Body Modifications

Main body OATT Provisions modified through Attachment T provisions (**where DSW is the “WAPA EIM Entity”**):

- Section 2: “Notwithstanding the provisions of Section 10.2 of the Tariff, the standard of liability for the actions of the WAPA EIM Entity performed consistent with this Attachment T 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 22-01:

Attachment T, Main Body Modifications (Cont'd)

Main body OATT Provisions modified through Attachment T 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 WAPA EIM Entity is participating in the EIM are described in Schedule 4T of this Tariff. 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 WAPA EIM Entity is participating in the EIM are described in Schedule 9T of this Tariff. Otherwise, such rates and/or methodology related to Generator Imbalance Service are described in Section 3.7 of the Tariff.”



WAPA OATT Revision 22-01: Attachment T, Summary, Section 2

Section 2 – General Provisions / Applicability:

- Attachment T shall be in effect for as long as DSW, as WAPA EIM Entity, implements the EIM and until all final settlements are finalized resulting from such implementation or termination.
- Attachment T 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 this Tariff or Attachments L, M and/or T of this Tariff
 - (2) all Transmission Customers with legacy transmission agreements that pre-existed this Tariff and that expressly incorporate by reference the applicability of this Tariff and/or this Attachment T in particular, and
 - (3) DSW's use of the transmission system for service to Native Load Customers.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 2 (Cont'd)

Section 2 – General Provisions / Applicability:

- To the extent an Interconnection Customer controls the output of a generator located in DSW's BAA, the WAPA EIM Entity may require the Interconnection Customer to comply with a requirement in this Attachment T that on its face applies to a Transmission Customer to the extent that the WAPA EIM Entity makes a determination, in its sole discretion, that the Interconnection Customer is the more appropriate party to satisfy the requirements of Attachment T than any Transmission Customer.
- Any Transmission Customer duties and obligations related to the EIM are those identified in this Tariff, unless the Transmission Customer voluntarily elects to participate directly in the EIM with WAPA EIM Participating Resources, in which case the MO Tariff provisions for EIM Participating Resources and EIM Participating Resource Scheduling Coordinators shall also apply.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 3

Section 3 – Election of Transmission Customers to become WAPA EIM Participating Resources:

- The decision of a Transmission Customer to participate in the EIM with resources as WAPA EIM Participating Resources is voluntary. A Transmission Customer that chooses to have a resource become a WAPA EIM Participating Resource must:
 - (a) Meet the requirements specified in Section 4 of this Attachment T and the WAPA EIM Entity's business practices;
 - (b) Become or retain a MO-certified EIM Participating Resource Scheduling Coordinator; and
 - (c) Follow the application and certification process specified in this Attachment T and the WAPA EIM Entity's business practices posted on the WAPA EIM Entity's OASIS.
- Transmission Customers which own or control multiple resources may elect to have any or all of their resources be WAPA EIM Participating Resources, in which case any resources that are not elected by the Transmission Customer to be WAPA EIM Participating Resources shall be treated as Non-Participating Resources for purposes of this Attachment T.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 4

Section 4 – Eligibility to be a WAPA EIM Participating Resource:

- Resources owned or controlled by Transmission Customers and located within the metered boundaries of WAPA's BAA are eligible to become WAPA EIM Participating Resources. The Transmission Customer that owns or controls the resource must have associated transmission rights based on one of the following:
 - (a) 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
 - (b) 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 DSW's BAA



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 4 (Cont'd)

Section 4 – Eligibility to be a WAPA EIM Participating Resource (Cont'd):

- Application for registration of WAPA EIM Participating Resources shall be the responsibility of the applicant as set forth in Section 4.3.1.
- At the time of application, any WAPA EIM Participating Resource applicant must elect to perform the duties of either a CAISO Metered Entity or Scheduling Coordinator Metered Entity, consistent with the MO's requirements, as applicable.
- The WAPA EIM Entity shall process the application as set forth in Section 4.3.2 and in conjunction with the WAPA EIM Entity's business practices.
- If the application has not been approved; or has not yet been certified by the WAPA EIM Entity consistent with Section 4.3.3, the resource shall be deemed to be a Non-Participating Resource.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 4 (Cont'd)

Section 4 – Eligibility to be a WAPA EIM Participating Resource (Cont'd):

- Upon approval of an application and in accordance with the process specified in the WAPA EIM Entity's business practices, certification by the WAPA EIM Entity of the WAPA EIM Participating Resource to participate in the EIM shall occur once the Transmission Customer has demonstrated and the MO has confirmed that the Transmission Customer has:
 - (a) Met the MO's criteria to become an EIM Participating Resource and executed the MO's pro forma EIM Participating Resource Agreement;
 - (b) Qualified to become or retained the services of a MO-certified EIM Participating Resource Scheduling Coordinator;
 - (c) Met the necessary metering requirements of this Tariff and the MO Tariff and the EIM Participating Resource Scheduling Coordinator has executed the MO's pro forma Meter Service Agreement for Scheduling Coordinators; and
 - (d) Met communication and data requirements of this Tariff and the MO Tariff; and has the ability to receive and implement Dispatch Instructions every 5 minutes from the MO.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 4 (Cont'd)

Section 4 – Eligibility to be a WAPA EIM Participating Resource (Cont'd):

- Each Transmission Customer with a WAPA EIM Participating Resource has an ongoing obligation to inform the WAPA EIM Entity of any changes to any of the information submitted as part of the application process under this Attachment T consistent with the WAPA EIM Entity's business practices. This information includes, but is not limited to:
 - (a) Any change in the WAPA EIM Participating Resource Scheduling Coordinator representing the resource;
 - (b) Any change in the ownership or control of the resource;
 - (c) Any change to the physical characteristics of the resource required to be reported to the MO in accordance with the MO Tariff; or
 - (d) If either the MO terminates the participation of the WAPA EIM Participating Resource in the EIM or the Transmission Customer has terminated the WAPA EIM Participating Resource's participation in the EIM; in either case, that resource shall be considered to be a Non-Participating Resource.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 5

Section 5 – Roles and Responsibilities:

- DSW, as WAPA EIM Entity and WAPA EIM Entity Scheduling Coordinator:
 - Coordinate and facilitate the EIM in accordance with the requirements of the MO Tariff.
 - Process applications of Transmission Customers seeking authorization to participate in the EIM with resources as WAPA EIM Participating Resources.
 - Make decisions with respect to EIM participation that the MO requires of EIM Entities (See Section 5.1.1.3 for certain determinations).
 - Develop business practices for EIM implementation, and post on DSW's OASIS.
 - Take corrective action to maintain reliability of DSW's BAA, in accordance with Section 11.3.
 - Provide modeling, outage, and metering data as required by the MO. Registers all Non-Participating Resources.
 - Responsible for day-to-day operations, including data submissions to the MO, Manual Dispatch, confirmation of dynamic schedules, dispatch of EIM Available Balancing Capacity, determination of EIM Transfer Capability, etc.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 5 (Cont'd)

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

- Transmission Customers:
 - Must comply with the applicable requirements of the MO Tariff, the WAPA Tariff, and any business practices and operating procedures developed by the MO and DSW, as WAPA EIM Entity.
 - Register and/or maintain data for WAPA EIM Participating Resources and Non-Participating Resources.
 - Provide planned and unplanned outage data for generation and customer owned transmission resources within DSW's BAA.
 - Provide base schedules and/or forecast data, and other applicable data, per WAPA EIM Entity requirements.
 - Provide meter data per WAPA EIM Entity requirements



WAPA OATT Revision 22-01: Attachment T, Summary, Section 6

Section 6 – Transmission Operations:

- The WAPA EIM Entity shall provide the MO information on the following:
 - (1) real time data for the Transmission System and interties; and
 - (2) any changes to transmission capacity and the Transmission System due to operational circumstances.
- The WAPA EIM Entity shall facilitate the provision of transmission capacity for EIM Transfers by providing the MO with information about the amounts available for EIM Transfers utilizing Available Transfer Capability (ATC). The provision of EIM Transfer capacity corresponding to ATC shall be implemented consistent with the requirements of the MO Tariff and WAPA EIM Entity's business practices. The ATC associated with the submitted e-Tag shall be available for the EIM, subject to approval of the e-Tag by all required e-Tag approval entities.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 7

Section 7 – System Operations:

- Participation in the EIM shall not modify, change, or otherwise alter:
 - the manner in which the WAPA EIM Entity operates its Transmission System consistent with applicable reliability standards, including adjustments.
 - the obligations of the WAPA EIM Entity, Transmission Customers with WAPA EIM Participating Resources, or Transmission Customers with Non-Participating Resources to comply with applicable reliability standards.
- If the MO declares an EIM disruption, the WAPA EIM Entity shall promptly inform the MO of actions taken by providing adjustment information, updates to e-Tags, transmission limit adjustments, or outage and de-rate information, as applicable.
- The WAPA EIM Entity may issue a Manual Dispatch order to a Transmission Customer with a WAPA EIM Participating Resource or a Non-Participating Resource in DSW's BAA, to address reliability or operational issues in DSW's BAA that the EIM is not able to address through normal economic dispatch and congestion management. The WAPA EIM Entity shall inform the MO of a Manual Dispatch as soon as possible



WAPA OATT Revision 22-01: Attachment T, Summary, Section 7 (Cont'd)

Section 7 – System Operations (Cont'd):

- The WAPA EIM Entity shall remain responsible for:
 - (a) maintaining appropriate operating reserves and for its obligations pursuant to any reserve sharing group agreements;
 - (b) NERC and WECC responsibilities including, but not limited to, informing the Reliability Coordinator of issues within DSW's BAA;
 - (c) processing e-Tags and managing schedule curtailments at the interties; and
 - (d) monitoring and managing real-time flows within system operating limits on all transmission facilities within DSW's BAA, including facilities of DSW BAA Transmission Owners. If requested by a Transmission Customer that is also a DSW BAA Transmission Owner, the WAPA EIM Entity will provide additional information or data related to EIM operation as it may relate to facilities of a DSW BAA Transmission Owner.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 8

Section 8 – Outages:

- Transmission Customers that are also DSW BAA Transmission Owners shall provide the WAPA EIM Entity with planned and unplanned transmission outage data.
- Transmission Customers with Non-Participating Resources shall provide the WAPA EIM Entity with planned and unplanned resource outages and known derate data.
- WAPA EIM Participating Resource Scheduling Coordinators shall submit information regarding planned and unplanned WAPA EIM Participating Resource outages and known derates to the WAPA EIM Entity.
- DSW, as WAPA EIM Entity, communicates outage data regarding planned and unplanned outages (and derates) of WAPA EIM Entity and Transmission Customer transmission facilities, WAPA EIM Participating Resources, and Non-Participating Resources to the MO's outage management system in accordance with the MO Tariff.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 9

Section 9 – EIM Settlements and Billing:

- DSW, as WAPA EIM Entity, shall settle EIM related charges through the schedules in the addendums of Attachment T, and associated DSW Rate Schedules.
 - OATT Schedule 1T → Rate Schedule DSW-EIM1T
 - OATT Schedule 4T → Rate Schedule DSW-EIM4T
 - OATT Schedule 9T → Rate Schedule DSW-EIM9T
- DSW shall also develop and maintain Business Practices (BPs) describing the settlements process associated with EIM charges, as details of such processes are subject to evolution based on implementation and operation of the WAPA EIM Entity.
- DSW's BPs for EIM settlements shall be posted on DSW's OASIS. Revisions to the posted settlement practices shall be managed through public stakeholder processes.
 - Drafting on-going; draft posting details will be communicated in Summer 2022. WAPA will provide further BP updates via upcoming OASIS postings.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 9 (Cont'd)

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:
WAPA EIM Participating Resources will not incur unreserved use charges solely as the result of EIM Dispatch Instruction. For uses that exceed the EIM Dispatch Instruction, the WAPA EIM Entity will assess unreserved use in accordance with the WAPA EIM Entity's business practices and settle such charges under Schedule 10 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 this Tariff, and in accordance with DSW's business practices. Settlement of real power losses associated with EIM Energy Imbalance Service shall be pursuant to Schedule 4T, and settlement of Real Power Losses associated with EIM Generator Imbalance Service shall be pursuant to Schedule 9T.
 - Note: Incremental losses associated with EI/GI addressed through the marginal loss components of the market LAP/LMP



WAPA OATT Revision 22-01: Attachment T, Summary, Section 9 (Cont'd)

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

- EIM Administrative Service:

DSW, as WAPA EIM Entity, shall settle EIM administrative service charges with Transmission Customers through Schedule 1T of the Tariff. This settlement recovers the administrative costs for participation in the EIM by the WAPA EIM Entity, including but not limited to such administrative charges as may be incurred by the WAPA EIM Entity from the MO.

- EIM Energy Imbalance Service:

The rates and/or methodology related to Energy Imbalance Service when the WAPA EIM Entity is participating in the EIM are described in Schedule 4T. Energy Imbalance Service settlements incurred by the WAPA EIM Entity during EIM participation shall be settled with Transmission Customers through Schedule 4T. Charges may include:

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

- EIM Generator Imbalance Service:

The rates and/or methodology related to Generator Imbalance Service when the WAPA EIM Entity is participating in the EIM are described in Schedule 9T. Generator Imbalance Service settlements incurred by the WAPA EIM Entity during EIM participation shall be settled with Transmission Customers through Schedule 9. Charges may include:

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



WAPA OATT Revision 22-01: Attachment T, Summary, Section 9 (Cont'd)

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

- Other EIM Settlements:

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

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

- MO Tax Liabilities:

Any charges to the WAPA 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 WAPA EIM Entity will follow the MO's payment calendar for issuing settlement statements, exchanging invoice funds, submitting meter data, and submitting settlement disputes to the MO.

- Market Validation and Price Correction:

If the MO modifies the WAPA EIM Entity's EIM settlement statement in accordance with the MO's market valuation and price correction procedures in the MO Tariff, the WAPA EIM Entity may make corresponding or similar changes to the charges and payments sub-allocated under this Attachment T.



WAPA OATT Revision 22-01:

Attachment T, Summary, Section 10

Section 10 – Compliance:

- Transmission Customers with WAPA EIM Participating Resources or Non-Participating Resources and WAPA EIM Participating Resource Scheduling Coordinators are responsible for:
 - Provision of Data:
 - Complying with applicable information requests they receive directly from the EIM market monitor or regulatory authorities concerning EIM activities.
 - Providing the WAPA EIM Entity with all applicable data necessary to respond to information requests received by the WAPA EIM Entity from the MO, the EIM market monitor, or regulatory authorities concerning EIM activities.
 - Transmission Customers shall adhere 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 22-01: Attachment T, Summary, Section 11

Section 11 – Market Contingencies:

- EIM Suspension:
 - In the event of EIM suspension, DSW, as the WAPA EIM Entity, 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 DSW's participation in the EIM.
 - Any EIM related service charges that continue to be incurred by DSW, as the WAPA EIM Entity, during temporary suspension, as provided by DSW's business practices, shall be settled in accordance with the applicable schedules of Attachment T.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 11 (Cont'd)

Section 11 – Market Contingencies (Cont'd):

- Termination of EIM Participation:
 - DSW, as WAPA EIM Entity, shall notify the MO and Transmission Customers if notice of EIM termination is submitted in accordance with the applicable agreements and Section 5.1.1.5.
 - In order to mitigate price exposure during the 180-day period between submission of the notice and the termination effective date, the WAPA EIM Entity may invoke the following corrective actions by requesting that the MO:
 - (a) prevent EIM Transfers and separate DSW's BAA from operation of the EIM in the EIM Area; and
 - (b) suspend settlement of EIM charges with respect to the WAPA EIM Entity.
 - Once such corrective actions are implemented by the MO, the WAPA EIM Entity shall utilize Schedules 4 and 9 and Sections 15.7 and 28.5 of WAPA's OATT.



WAPA OATT Revision 22-01: Attachment T, Summary, Section 11 (Cont'd)

Section 11 – Market Contingencies (Cont'd):

- Management of Contingencies and Emergencies :
 - The WAPA EIM Entity may declare a temporary contingency and invoke corrective actions for the EIM due to:
 - Operational circumstances causing or at risk of causing abnormal system conditions in DSW's BAA, or to restore system operations to meet reliability criteria
 - Including failure of EIM to produce feasible results in DSW's BAA
 - Disruption of communications impacting ability to submit/receive data from MO systems
 - WAPA EIM Entity shall notify the MO and Transmission Customers if the above occurs resulting in corrective actions
 - WAPA EIM Entity 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 WAPA EIM Entity during temporary suspension and/or contingency, as provided by DSW's business practices, shall be settled in accordance with the applicable schedules of Attachment T.



WAPA OATT Revision 22-01: Attachment T, Schedules

Addendums 1/2/3 – Common Summary Provisions:

- Applicable only to DSW
- 1T/4T/9T apply when DSW, as WAPA EIM Entity, is participating in the EIM and when the EIM has not been suspended.
- To the extent that DSW, as WAPA EIM Entity, incurs EIM charges during periods of market suspension or contingency, as described in Section 11 of Attachment T, Schedules 1T/4T/9T shall also apply to ensure that DSW remains revenue neutral for its participation in the EIM.



WAPA OATT Revision 22-01: Attachment T, Schedules, Addendum 1

Addendum 1 – Schedule 1T – EIM Administrative Service:

- Schedule 1T shall apply in addition to Schedule 1 of the WAPA Tariff
- EIM Administrative Service recovers the administrative costs for participation in the EIM by DSW, as the WAPA 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 DSW, as the WAPA EIM Entity, shall be required to acquire EIM Administrative Service from DSW.
- Proposed Rate Schedule DSW-EIM1T



WAPA OATT Revision 22-01: Attachment T, Schedules, Addendum 2

Addendum 2 – Schedule 4T – 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 DSW's BAA.
- A Transmission Customer shall be charged or paid for Energy Imbalance Service charges allocated to DSW, as the WAPA EIM Entity, 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..
- Proposed Rate Schedule DSW-EIM4T



WAPA OATT Revision 22-01:

Attachment T, Schedules, Addendum 3

Addendum 3 – Schedule 9T – 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 DSW's BAA, as reflected in the resource component of the Transmission Customer Base Schedule, and the delivery schedule from that generator to (1) another BAA or (2) a load within DSW's BAA.
- A Transmission Customer shall be charged or paid for Generator Imbalance Service charges allocated to DSW, as WAPA EIM Entity, 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 DSW-EIM9T



WAPA OATT Revision 22-01: Attachment T, Schedules, Addendum 3 (Cont'd)

Addendum 3 – Schedule 9T – 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 DSW's BAA, the Interconnection Customer may be subject to charges for Generator Imbalance Service (rather than the Transmission Customer) in accordance with this Schedule 9T.



OASIS Postings for OATT Revision 22-01 (DSW EIM)

- Details and documents (**including the OATT Revision Redlines**) related to the proposed OATT Revision 22-01 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 22-01 package will also be posted on the OASIS sites at the same web link.



Next Steps

- **Comments Due by August 1, 2022**
 - Submit written comments by email to: tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around **September 1, 2022**
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around **September 30, 2022**
- WAPA Anticipates Filing to FERC on **December 15, 2022**
- Effective Date of OATT Revision 22-01 on **February 15, 2023** (60 days after WAPA filing)
- Business Practices: Drafting on-going; draft posting details will be communicated in Summer 2022. WAPA will provide further BP updates via upcoming OASIS postings.



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): Sean Erickson at 970-461-7584 (erickson@wapa.gov);
 - Sierra Nevada Region (SNR): Cory Danson at 916-353-4402 (danson@wapa.gov) or Ira Witherspoon at 916-353-4659 (withersp@wapa.gov)
 - Upper Great Plains Region (UGP): Steve Sanders at 406-255-2807 (sanders@wapa.gov) or Dirk Shulund at 406-255-2840 (shulund@wapa.gov)



Mailing Address for Comments (if necessary)

Tariff Comments

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