

Notice: Western Area Power Administration (WAPA) proposes revisions to its Open Access Transmission Tariff (OATT) to address FERC Orders 676-I/J (*Standards for Business Practices and Communication Protocols for Public Utilities*), and FERC Order 881 (*Managing Transmission Line Ratings*)

(OATT Revision 22-02)

Per November 1, 2022 OASIS Notice: WAPA-OATT-Revision-22-02-Announcement.pdf

November 1, 2022

Frequently Asked Questions (FAQs) - Version 1

- What OATT revisions are under consideration by WAPA during this update? WAPA currently has several important pending OATT revisions to address outstanding FERC Orders that need to be filed with FERC to retain WAPA's safe harbor OATT status. These outstanding FERC Orders include: Order 1000, Orders 676-I and 676-J, and Order 881. WAPA is proposing to address FERC Order Nos. 676-I, 676-J, and 881 in this OATT Revision 22-02, as well as other clean up and maintenance updates to WAPA's OATT. WAPA plans additional subsequent OATT revisions, including associated stakeholder processes, to address FERC Order 1000 when it is prepared to proceed with those revisions.
- 2. What information is available regarding the changes required by FERC under Orders 676-I, 676-J, and 881?

Links to FERC's Orders 676-I/J are here: <u>Order No. 676-I</u>, and <u>Order No. 676-J</u> Links to FERC's Order 881 are here: <u>Order No. 881</u>, and <u>Order No. 881-A</u>

a. What are the primary changes that FERC required under these Orders?

 a. Order 676-I modified FERC's regulations to incorporate by reference, with certain exceptions, Version 003.2 of the NAESB WEQ Standards for Business Practices and Communication Protocols for Public Utilities (WEQ Standards) into the transmission provider's OATT.

b. Order 676-J modified FERC's regulations to incorporate by reference Version 003.3 of the WEQ Standards into the transmission provider's OATT.

- c. Order 881 changes are summarized in Exhibit #1 below.
- 3. What WAPA Region's will be impacted by these OATT revisions?

These OATT revisions will impact Transmission and Interconnection Customers (IC) in the CRSP, DSW, RMR, and SNR Regional Offices. UGP has joined SPP as a Transmission Owner and UGP's transmission facilities are primarily included under the SPP Open Access



Transmission Tariff (SPP Tariff), and generation interconnection and transmission service requests on those UGP facilities are processed under the SPP Tariff. SPP has already included FERC Orders 676-I, 676-J, and 881 requirements into the SPP Tariff.

4. What portions of the WAPA OATT will be revised?

The proposed OATT revisions are included primarily in Attachment N (for Orders 676-I and 676-J) and in a new Attachment U (for Order 881).

- Is WAPA going to seek comments on all proposed OATT revisions during the informal stakeholder comment process for OATT Revision 22-02?
 WAPA will be seeking comments on all proposed OATT revisions under this OATT Revision 22-02.
- 6. When does WAPA plan to post the proposed OATT revisions? WAPA plans to post the proposed OATT revisions (redlines) for OATT Revision 22-02 prior to the December 7, 2022, Stakeholder Meeting. WAPA also plans to provide notice of this posting via electronic mail to its customers/stakeholders.
- 7. What are WAPA's plans for stakeholder engagement on these OATT revisions as part of the informal stakeholder comment process? WAPA has posted Notice of its proposed OATT Revision 22-02 and is posting information for stakeholders on WAPA's OASIS sites. WAPA plans to hold an information meeting (via Net Conference) on December 7, 2022 (Stakeholder Meeting) to present the proposed OATT revisions to all stakeholders and answer questions. WAPA will also request comments following that meeting. Ultimately, WAPA will file the requested OATT revisions with FERC.
- 8. How long will the informal stakeholder comment period be?

The informal stakeholder comment period will be 30 days, which will begin on the date that WAPA posts the proposed OATT revisions (redlines) on WAPA's OASIS sites.

- 9. When will WAPA make a final decision on the OATT revisions? Following the completion of the informal stakeholder process.
- 10. When would the proposed OATT revisions become effective?

Normally, when WAPA files OATT revisions with FERC, it makes the OATT revisions effective approximately 60 days later, subject to subsequent FERC approval. WAPA plans to file the OATT revisions within approximately 1 month of completing its informal stakeholder process and making internal decisions. WAPA will outline the expected timeline during the December 7, 2022, Stakeholder Meeting.

11. Where is information regarding the proposed OATT revisions available? On WAPA's OASIS sites, available directly on the <u>WAPA OATT Revision Information webpage</u>.



12. Who can I contact if I have questions?

Any questions/comments can be directed to your specific WAPA OATT Regional contact(s):

- Desert Southwest Region (DSW): John Steward at 602-605-2774 (<u>steward@wapa.gov</u>);
- Rocky Mountain Region (RMR) and Colorado River Storage Project (CRSP): Sean Erickson at 970-461-7584 (<u>erickson@wapa.gov</u>);
- Sierra Nevada Region (SNR): Cory Danson at 916-353-4402 (<u>danson@wapa.gov</u>) or Ira Witherspoon at 916-353-4659 (<u>withersp@wapa.gov</u>);
- Upper Great Plains Region (UGP): Steve Sanders at 406-255-2807 (<u>sanders@wapa.gov</u>) or Dirk Shulund at 406-255-2840 (<u>shulund@wapa.gov</u>)



Exhibit #1 Summary of Changes required by FERC under Order 881

- Order 881
 - Requires transmission providers to implement ambient-adjusted transmission line ratings (Ambient-Adjusted Ratings or AARs) and seasonal ratings
 - AARs are to be used for evaluating requests for near-term transmission service, which is defined as transmission service that ends within 10 days of the date of the request
 - Seasonal ratings are to be used for evaluating other, longer-term transmission service requests
 - AARs are to be implemented within three years of compliance filings for all lines that are impacted by air temperatures
 - Requires RTOs and ISOs to establish and implement the systems and procedures necessary to allow transmission owners to electronically update transmission line ratings at least hourly
 - Requires transmission providers to use uniquely determined emergency ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints
 - Requires transmission owners to share transmission line ratings and transmission line rating methodologies with their respective transmission providers and, in RTOs/ISOs, with their respective market monitors
 - Requires transmission providers to maintain a database of each transmission owner's transmission line ratings and transmission line rating methodologies on either the transmission provider's OASIS or another password-protected website
 - Provides an exception to the use of AARs and seasonal ratings for transmission lines that are not affected by ambient air temperature or solar heating
 - Sets forth the above requirements and exception in a new *pro forma* OATT Attachment M
 - Required public utilities to submit compliance filings within 120 days of the order's publication in the Federal Register
 - Non-public utilities such as WAPA generally are not subject to FERC's compliance filing deadlines
- Order 881-A sustained the result of Order 881 and clarified certain aspects of Order 881, but it did not modify the language originally set forth in *pro forma* OATT Attachment M
- Implementation: Public utilities were directed to implement Order 881 within 3 years after the 7/12/2022 compliance filing deadline (i.e., 7/12/2025). Currently, WAPA is targeting implementation of Order 881 on 7/12/2025 to be consistent with its neighboring transmission providers.