

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

OATT Revision 22-02 (Orders 676-I/J and 881)

December 7, 2022

Stakeholder Meeting Presentation

Panel

- Steve Sanders, Industry Restructuring Advisor, UGP
- Ron Klinefelter, General Counsel & Senior VP
- Bob Kennedy, Open Access Services Compliance Advisor



Initial 11/1/2022 OASIS Posting – Proposed OATT Revision 22-02 (Orders 676-I/J & 881)

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

OATT Revision 22-02 (Active) (FERC Orders 676-I/J and 881) : (FAQs: WAPA-OATT-Revision-22-

02-FAQs.pdf, Version: 11/01/2022))

"11/01/2022: Initial Notification of Planned OATT Revision 22-02 (FERC Orders 676-I/J and 881), Announcement of Stakeholder Meeting on December 7, 2022

WAPA is evaluating OATT revisions to address FERC <u>Order No. 676-J</u> and <u>Order No. 676-J</u> (Standards for Business Practices and Communication Protocols for Public Utilities) and FERC <u>Order No. 881</u> and <u>Order No. 881-A</u> (Managing Transmission Line Ratings) - see Order 881 brief summary in the <u>FAQs</u>. WAPA indicated it would proceed with these revisions during the prior OATT Revisions 21-01 process and in its associated filing under FERC Docket No. NJ22-9-000. The OATT revisions will primarily be in existing Attachment N (for Orders 676-I/J) and a new Attachment U (for Order 881). In addition, WAPA also plans to evaluate other minor OATT clean-up and maintenance revisions. See announcement here: <u>WAPA-OATT-Revision-22-02-Announcement.pdf</u>. WAPA is also providing notice via electronic mail to its customers."



Initial 11/1/2022 OASIS Posting – Proposed OATT Revision 22-02 (Orders 676-I/J & 881) Cont'd

"As part of WAPA's process to seek stakeholder comments on the proposed OATT revisions, WAPA will hold a Stakeholder Meeting on **December 7, 2022 at 10am MST (via Net Conference)** to present its proposed OATT revisions for OATT Revision 22-02. Information is here: Net Conference.

WAPA's 30-day comment period will begin once WAPA posts its proposed OATT revisions on its Regional OASIS sites before the December 7, 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 December 7, 2022, Stakeholder Meeting. WAPA will also provide notice via electronic mail of the redlines postings."



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 22-02 on 11/1/2022.
- 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 11/15/2022. <u>The OATT Revision Redline posting on OASIS</u> <u>started the 30-day informal comment period, which ends on</u> <u>December 15, 2022</u>.
 - WAPA Public Affairs also issued an email notification to all customers/stakeholders informing them of the OASIS posting of the OATT Revision Redline.



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: <u>WAPA-Tariff-Docs</u>
- All information related to this OATT Revision 22-02 is available on WAPA's OASIS sites at: <u>WAPA OATT Revision(s) Status & Postings</u>
- 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 22-02 Filing – WAPA Approach

- 1. WAPA incorporates FERC's **pro forma** required provisions generally without changes <u>unless</u> there is a <u>statutory reason</u> 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 <u>approved</u> FERC **pro forma** or other acceptable language from other TP filings that have been approved by FERC to reduce the risk of a compliance Order from FERC.
- 3. Revisions are grouped in 2 Categories, with Redline Color Coding (Red, Blue), to clarify types of changes in WAPA filing and simplify stakeholder and FERC review.
 - Pro Forma Revisions Directed by Orders 676-I, 676-J, and 881
 - Revisions Proposed by WAPA



Overview of WAPA OATT Revision 22-02 – Revisions to Address Orders 676-I/J & 881

WAPA is proposing OATT Revision 22-02 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*), as well as other minor OATT clean-up and maintenance.

See announcement here: <u>WAPA-OATT-Revision-22-02-Announcement.pdf</u>.

Key revisions to address **FERC Orders 676-I/J** include revisions to existing Attachment N to WAPA's OATT):

- 1. Order 676-I incorporated by reference, with certain exceptions, **Version 003.2 of the NAESB WEQ Standards** into the transmission provider's OATT.
- 2. Order 676-J incorporated by reference, with certain exceptions, **Version 003.3 of the NAESB WEQ Standards** into the transmission provider's OATT.



Overview of WAPA OATT Revision 22-02 – Revisions to Address Orders 676-I/J & 881 (Cont'd)

Key revisions to address **FERC Order 881** include revisions to a new Attachment U to WAPA's OATT):

- 1. Requires transmission providers (TPs) to implement ambient-adjusted line ratings and seasonal ratings.
- 2. Requires TPs to use uniquely determined emergency ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints.
- 3. Requires transmission owners (TOs) to share transmission line ratings/methodologies with their respective TPs.
- 4. Requires TPs to maintain database of each TO's transmission line ratings/methodologies on either the TP's OASIS or password-protected website.
- 5. Public utilities were directed to implement Order 881 by 7/12/2025.



Overview of WAPA OATT Revision 22-02 – Impacted Transmission Customers

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



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"
- 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 FERC-jurisdictional TPs in the WestConnect planning region filing notice with FERC indicating they may modify their filed OATT planning attachments to <u>remove</u> the FERC-approved CTO provisions.
- The FERC-jurisdictional TPs appealed the Commission's order initially approving the WestConnect planning region to the Fifth Circuit Court of Appeals. However, in February of 2022 the jurisdictional parties filed a settlement agreement in Docket No. ER22-1105 that would resolve all matters before the Fifth Circuit. Based on the settlement agreement filed in that docket, activity in the Fifth Circuit appeal has been suspended until December 2022 by the court's own motion to see if the settlement pending before the Commission in the docket makes the appellate case moot.



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

- The CTO provision is a key concept that allows non-jurisdictional participants (like WAPA) 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.



Scope of Orders 676-I/J (NAESB WEQ Standards)

- FERC's Orders 676-I/J are here: Order No. 676-I, and Order No. 676-J
- 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.
- Order 676-J modified FERC's regulations to incorporate by reference Version 003.3 of the WEQ Standards into the transmission provider's OATT.
- Revisions are incorporated into the existing Attachment N to WAPA's OATT.



Scope of Order 881 (Transmission Line Ratings)

- FERC's Order 881 are here: Order No. 881, and Order No. 881-A
- Requires transmission providers (TPs) 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 TPs to use uniquely determined emergency ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints



Scope of Order 881 (Transmission Line Ratings) Cont'd

- Requires transmission owners (TOs) to share transmission line ratings and transmission line rating methodologies with their respective TP's and, in RTOs/ISOs, with their respective market monitors
- Requires TPs to maintain a database of each TO's transmission line ratings and transmission line rating methodologies on either the TP'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 formal OATT Attachment M
- Public utilities were directed to implement Order 881 by 7/12/2025



WAPA OATT Revision 22-02: Filing Proposal, Overview

- Existing Attachment N
 - Incorporate changes from Orders 676-I and J (NAESB WEQ Standards 003.2 and 003.3 updates)
- New Attachment U:
 - Incorporate FERC's pro-forma Attachment M from Order 881
 - Set effective date of Order 881 in Attachment U as 7/12/2025
- Miscellaneous minor revisions (e.g., general clean-up, etc.) throughout OATT, Large Generator Interconnection Procedures and Agreement, and Small Generator Interconnection Procedures and Agreement



WAPA OATT Revision 22-02: Attachment N (for Orders 676-I & J)

In Order 676-I, the modifications replaced/updated several previously incorporated WEQ Standards

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms
- WEQ-001, Open Access Same-Time Information System (OASIS)
- WEQ-002, OASIS Business Practice Standards and Communication Protocols
- WEQ-003, OASIS Data Dictionary
- WEQ-004, Coordinate Interchange
- WEQ-005, Area Control Error (ACE) Equation Special Cases
- WEQ-006, Manual Time Error Correction
- WEQ-007, Inadvertent Interchange Payback
- WEQ-008, Transmission Loading Relief (TLR)
- WEQ-011, Gas/Electric Coordination
- WEQ-012, Public Key Infrastructure (PKI)
- WEQ-013, OASIS Implementation Guide
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response
- WEQ-021, Measurement and Verification of Energy Efficiency Products

In Order 676-I, two sets of previously unincorporated WEQ Standards were included

- WEQ-022, Electric Industry Registry
- WEQ-023, Modeling



WAPA OATT Revision 22-02: Attachment N (for Orders 676-I & J) Cont'd

- In Order 676-J, the WEQ Version 003.3 modifications replaced/updated several previously incorporated WEQ Standards
 - Revisions related to the surety assessment on cybersecurity performed by Sandia National Laboratories designed to strengthen the practices and cybersecurity protections established within the WEQ Standards
 - Additions, revisions, and reservations made to the WEQ-008 TLR Standards, which complete the WEQ Standards development effort for the Parallel Flow Visualization (PFV) enhanced congestion management process (PFV Standards) [Eastern Interconnection]
 - In their entirety, the WEQ-023 Modeling Standards contained in the WEQ Version 003.1 Standards, which address the technical issues affecting Available Transfer Capability (ATC) and Available Flowgate Capability calculation for wholesale electric transmission services, with the addition of certain revisions and corrections
- Order 676-J also modified FERC's regulations to provide that TPs must avoid unduly discriminatory and preferential treatment in the calculation of ATC



WAPA OATT Revision 22-02: Attachment U (for Order 881)

New Attachment U – Provisions (No changes to FERC pro-forma)

- Effective Date:
 - "This Attachment U shall become effective on July 12, 2025."
- General
 - "The Transmission Provider will implement Transmission Line Ratings on the transmission lines over which it provides Transmission Service, as provided below."
- Definitions
- System Reliability
- Obligations of Transmission Provider
- Exceptions



Definitions

"Transmission Line Rating" means the maximum transfer capability of a transmission line, computed in accordance with a written Transmission Line Rating methodology and consistent with Good Utility Practice, considering the technical limitations on conductors and relevant transmission equipment (such as thermal flow limits), as well as technical limitations of the Transmission System (such as system voltage and stability limits). Relevant transmission equipment may include, but is not limited to, circuit breakers, line traps, and transformers."



Definitions (Cont'd)

"Ambient-Adjusted Rating" (AAR) means a Transmission Line Rating that:

- (a) Applies to a time period of **not greater than one hour**.
- (b) **Reflects an up-to-date forecast** of ambient air temperature across the time period to which the rating applies.
- (c) Reflects the absence of solar heating during nighttime periods, where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently.

(d) Is calculated at least each hour, if not more frequently."

Definitions (Cont'd)

"Seasonal Line Rating" means a Transmission Line Rating that:

- (a) Applies to a specified season, where seasons are defined by the Transmission Provider to include **not fewer than four seasons** in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent.
- (b) Reflects an **up-to-date forecast** of ambient air temperature across the relevant season over which the rating applies.
- (c) **Is calculated annually**, if not more frequently, for each season in the future for which Transmission Service can be requested."



Definitions (Cont'd)

"Near-Term Transmission Service" means Transmission Service which ends not more than 10 days after the Transmission Service request date. When the description of obligations below refers to either a request for information about the availability of potential Transmission Service (including, but not limited to, a request for ATC), or to the posting of ATC or other information related to potential service, the date that the information is requested or posted will serve as the Transmission Service request date.

"Near-Term Transmission Service" **includes** any Point-To-Point Transmission Service, Network Resource designations, or secondary service where the start and end date of the designation or request is within the next 10 days."



WAPA OATT Revision 22-02: Attachment U (for Order 881) – System Reliability

"If the Transmission Provider reasonably determines, consistent with Good Utility Practice, that the temporary use of a Transmission Line Rating different than would otherwise be required by this Attachment is necessary to ensure the safety and reliability of the Transmission System, then the Transmission Provider may use such an alternate rating."

The Transmission Provider **must document** in its **database** of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website, as required by this Attachment, the use of an alternate Transmission Line Rating under this paragraph, including the nature of and basis for the alternate rating, the date and time that the alternate rating was initiated, and (if applicable) the date and time that the alternate rating was withdrawn and the standard rating became effective again."



"The Transmission Provider must use AARs as the relevant Transmission Line Ratings when performing any of the following functions:

- (1) evaluating requests for Near-Term Transmission Service;
- (2) responding to requests for information on the availability of potential Near-Term Transmission Service (including requests for ATC or other information related to potential service); or
- (3) posting ATC or other information related to Near-Term Transmission Service to the Transmission Provider's OASIS site or another password-protected website."



"The Transmission Provider **must use AARs** as the relevant Transmission Line Ratings when determining whether to **curtail** (**under section 13.6**) Firm Point-To-Point Transmission Service or when determining whether to **curtail and/or interrupt** (**under section 14.7**) Non-Firm Point-To-Point Transmission Service **if** such curtailment and/or interruption is both necessary because of issues related to flow limits on transmission lines **and** anticipated to occur (start and end) within 10 days of such determination.

For determining whether to curtail or interrupt Point-To-Point Transmission Service in other situations, the Transmission Provider **must use** Seasonal Line Ratings as the relevant Transmission Line Ratings."



"The Transmission Provider must use AARs as the relevant Transmission Line Ratings when determining whether to curtail (under section 33) or redispatch (under sections 30.5 and/or 33) Network Integration Transmission Service or secondary service if such curtailment or redispatch is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination.

For determining the necessity of curtailment or redispatch of Network Integration Transmission Service or secondary service in other situations, the Transmission Provider **must use** Seasonal Line Ratings as the relevant Transmission Line Ratings."



"The Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings when evaluating requests for and whether to curtail, interrupt, or redispatch any Transmission Service not otherwise covered above in this section (including, but not limited to, requests for non-Near-Term Transmission Service or requests to designate or change the designation of Network Resources or Network Load), when developing any ATC or other information posted or provided to potential customers related to such services.

The Transmission Provider **must use** Seasonal Line Ratings as a recourse rating in the event that an AAR otherwise required to be used under this Attachment is unavailable."



"The Transmission Provider must use <u>uniquely determined</u> **Emergency Ratings** for contingency analysis in the operations horizon and in post-contingency simulations of constraints. Such uniquely determined Emergency Ratings must also include separate AAR calculations for each Emergency Rating duration used.

In developing **forecasts of ambient air temperature** for AARs and Seasonal Line Ratings, the Transmission Provider **must develop such forecasts** consistent with Good Utility Practice and on a non-discriminatory basis."



"Postings to OASIS or another password-protected website: **The Transmission Provider must maintain** on the password-protected section of its OASIS page or on another password-protected website **a database** of **Transmission Line Ratings** and **Transmission Line Rating methodologies**. The database must include a full record of all Transmission Line Ratings, both as used in real-time operations, and as used for all future periods for which Transmission Service is offered. Any postings of temporary alternate Transmission Line Ratings or exceptions used under the System Reliability section above or the Exceptions section below, respectively, are considered part of the database.

The database must include records of which Transmission Line Ratings and Transmission Line Rating methodologies were in effect at which times over at least the previous five years, including records of which temporary alternate Transmission Line Ratings or exceptions were in effect at which times during the previous five years. Each record in the database must indicate which transmission line the record applies to, and the date and time the record was entered into the database. The database must be maintained such that users can view, download, and query data in standard formats, using standard protocols."



"Sharing with Transmission Providers: The Transmission Provider must share, upon request by any Transmission Provider and in a timely manner, the following information:

- (1) Transmission Line Ratings for each period for which Transmission Line Ratings are calculated, with updated ratings shared each time Transmission Line Ratings are calculated, and
- (2) Written Transmission Line Rating methodologies used to calculate the Transmission Line Ratings in (1) above."



"Where the Transmission Provider determines, consistent with Good Utility Practice, that the Transmission Line Rating of a transmission line **is not affected by ambient air temperature or solar heating**, the Transmission Provider **may use** a Transmission Line Rating for that transmission line that is **not** an AAR or Seasonal Line Rating.

Examples of such a transmission line may include (but are not limited to): (1) a transmission line for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a transmission line whose transfer capability is limited by a Transmission System limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating."



"The Transmission Provider **must document** in its **database** of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website **any exceptions** to the requirements contained in this Attachment initiated under this paragraph, including the nature of and basis for each exception, the date(s) and time(s) that the exception was initiated, and (if applicable) the date(s) and time(s) that each exception was withdrawn and the standard rating became effective again. If the technical basis for an exception under this paragraph changes, then the Transmission Provider must update the relevant Transmission Line Rating(s) in a timely manner.

The Transmission Provider must reevaluate any exceptions taken under this paragraph at least every five years."



WAPA OATT Revision 22-02: Miscellaneous Minor Revisions – Summary 1

- Potential substantive revision Update of the pro forma references to FERC's Standards of Conduct (SOC) regulations
 - Order 2004 moved FERC's electric industry SOC regulations from <u>18 CFR §</u> 37.4 to <u>18 CFR § 358</u>
 - Sections 1.32, 17.2, 18.2, and 19.2 of the *pro forma* OATT continue to reference the SOC regulations as 18 CFR § 37.4
 - WAPA is considering updating its OATT to reference the SOC regulations as 18 CFR § 358



WAPA OATT Revision 22-02: Miscellaneous Minor Revisions – Summary 2

- Proposed non-substantive clean-up items
 - Revisions needed to both WAPA's eTariff records and the OATT documents posted on WAPA's OASIS e.g., correction of missing apostrophes in OATT sections 9, 19.11, and 32.6
 - Revisions that need to be made only in WAPA's posted documents and therefore do not require filing with FERC e.g., correction of a minor grammatical error that is present in section 1.42 of the posted OATT document but is not present in the associated eTariff record text
 - Revisions that need to be made only in eTariff record text but were replicated in WAPA's posted documents to illustrate the change for stakeholders and FERC e.g., correction of a minor grammatical error that is present in the OATT section 2.2 eTariff record text but was not present in the posted OATT document
 - Revisions only to eTariff record metadata e.g., corrections of the Parent Record ID metadata for various provisions such as sections 9.1, 10.1, 10.2, and 10.3 of OATT Attachment A, which were incorrectly assigned by the automated script that generated WAPA's baseline tariff



OASIS Postings for OATT Revision 22-02 (Orders 676-I/J & 881)

- Details and documents (including the OATT Revision Redlines) related to the proposed OATT Revision 22-02 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 22-02 package will also be posted on the OASIS sites at the same web link.



Next Steps

- Comments Due by December 15, 2022
 - Submit written comments by email to: tariffcomments@wapa.gov
- Posting of Comments Summary/WAPA Responses on OASIS sites by around January 13, 2023
- WAPA finalizes proposed OATT Revision Package, OASIS Posting by around February 1, 2023
- WAPA Anticipates Filing to FERC on April 14, 2023
- Effective Date of OATT Revision 22-02 on **June 13, 2023** (60 days after WAPA filing)

Note: New Attachment U (for Order 881) will become effective on **July 12, 2025,** per its terms, consistent with FERC's implementation requirements.

• **Business Practices**: WAPA reviewing need for BPs as part of its preparations for implementation of Order 881 on July 12, 2025. WAPA will provide further BP updates via upcoming OASIS postings. Likely mid-late 2024.



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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