ORIGINAL



Department of Energy

Western Area Power Administration P.O. Box 281213 Lakewood, CO 80228-8213

July 5, 2007

VIA FEDERAL EXPRESS

Honorable Kimberly D. Bose Office of the Secretary Federal Energy Regulatory Commission 888 First Street, NE Room 1A, East Washington, DC 20426

Re: Western Area Power Administration

Docket No. NJ07-2-001

Dear Secretary Bose:

Enclosed please find the original and five copies of the Western Area Power Administration's (Western) compliance filing in response to the Federal Energy Regulatory Commission's June 28, 2007 Order requesting modifications to Western's Open Access Transmission Tariff. 1

Also enclosed is an additional copy that I would appreciate being time-stamped and returned in the enclosed self-addressed envelope.

Sincerely,

Ronald J. Klinefelter

Attorney

Office of General Counsel

Enclosures

Western Area Power Administration, 119 FERC ¶ 61,329 (2007).



Department of Energy

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VIA FEDERAL EXPRESS

Honorable Kimberly D. Bose Office of the Secretary Federal Energy Regulatory Commission 888 First Street, NE Room 1A, East Washington, DC 20426

Re: Western Area Power Administration

Docket No. NJ07-2-001

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission's (Commission) Order dated June 28, 2007¹, the United States Department of Energy, Western Area Power Administration (Western) hereby submits revisions to its amended non-jurisdictional open access transmission tariff (OATT).

I. BACKGROUND

On March 1, 2007, Western filed an amendment to its OATT to incorporate the pro forma SGIP and SGIA promulgated under Order Nos. 2006, 2006-A and 2006-B. The filing incorporated specific pro forma references to certain North American Energy Standards Board (NAESB) Wholesale Electric Quadrant (WEQ) standards as directed by the Commission in Order No. 676 and 676-A as well as the pro forma Interconnection Procedures and Requirements for a Wind Generating Plant as directed by the Commission in Order No. 661 and 661-A. Western also made the changes outlined in Appendix B to Order No. 2003-B that were inadvertently missed in a previous filing.

Western Area_Power_Administration, 119 FERC ¶ 61,329 (2007).

As provided by Sections 35.28(e) and (f) of the Commission's Regulations², Western requested that the Commission issue a declaratory order determining that Western's amended OATT maintains its status as a "safe-harbor" tariff, ensuring that it may not be denied transmission access by any FERC-jurisdictional public entity.

The Commission's June 28, 2007 Order conditionally granted Western's petition for a declaratory order which maintains its status as a reciprocity or "safe-harbor" tariff. The Commission's Order conditioned approval of Western's OATT upon removal of modifications Western made to the SGIA attaching standard technical requirements for the interconnection of small wind generating plants, which largely mirrored the requirements outlined in Order No. 661.

II. AMENDED OATT REVISION

This filing removes the relevant language in SGIA Article 1.8.1 and deletes Western's proposed Attachment 7. As such, this compliance filing fully complies with the Commission's June 28, 2007 Order conditionally granting Western's petition for a declaratory order maintaining its status as a reciprocity or "safe-harbor" tariff.

III. EFFECTIVE DATE

Western respectfully requests that the Commission deem the revisions to its OATT effective May 1, 2007, as originally accepted by the Commission in its June 28, 2007 Order.

IV. SERVICE

Western shall make copies of this filing available for public inspection on its OASIS. Western has also served this filing on all parties to this proceeding.

² 18 C.F.R. § 35.28(e) and (f) (2006).

V. CONTENTS OF FILING

Along with this transmittal letter, the documents submitted with this filing include:

Attachment A - Redlined version of the new tariff sheets.

Attachment B - Clean version of the new tariff sheets.

Due to the Commission's issuance of the Notice Announcing New Combined Notice of Filings (May 13, 2005), Western has not included a Notice of Filing suitable for publication in the Federal Register or a diskette containing the same.

VI. COMMUNICATION

Western requests that all correspondence, pleadings, and other communications concerning this filing be served upon:

Ronald J. Klinefelter
Attorney
Western Area Power Administration
Office of General Counsel
12155 W. Alameda Parkway
P.O. Box 281213
Lakewood, CO 80228-8213
(720) 962-7010
klinefel@wapa.gov

Robert Kennedy
Restructuring Manager
Western Area Power Administration
Rocky Mountain Region
5555 East Crossroads Blvd.
Loveland, CO 80538-8986
(970) 461-7259
Rkennedy@wapa.gov

VII. CONCLUSION

For all the forgoing reasons, Western respectfully requests that the Commission accept the instant filing, as set forth herein.

Dated June 5, 2007.

Respectfully submitted,

Ronald J. Klinefelter

Attorney

Office of General Counsel

Western Area Power Administration

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated July 5, 2007 at Lakewood, Colorado.

Ву:

Office of General Counsel

Western Area Power Administration

P.O. Box 281213

Lakewood, CO 80228-8213

(720) 962-7010 (voice)

(720) 962-7009 (fax)

ATTACHMENT A

<u>First Revised Sheet</u> (Contract Number) (Interconnection Customer)

generation set forth in the Tariff or by the applicable system operator(s) for the Transmission Provider's Transmission System and; 2) the Operating Requirements set forth in Attachment 5 of this Agreement.

1.7 Metering

The Interconnection Customer shall be responsible for the Transmission Provider's reasonable and necessary cost for the purchase, installation, operation, maintenance, testing, repair, and replacement of metering and data acquisition equipment specified in Attachments 2 and 3 of this Agreement. The Interconnection Customer's metering (and data acquisition, as required) equipment shall conform to applicable industry rules and Operating Requirements.

1.8 Reactive Power

- 1.8.1 The Interconnection Customer shall design its Small Generating Facility to maintain a composite power delivery at continuous rated power output at the Point of Interconnection at a power factor within the range of 0.95 leading to 0.95 lagging, unless the Transmission Provider has established different requirements that apply to all similarly situated generators in the control area on a comparable basis. The requirements of Attachment 7 to this SGIA shall apply to wind generators. The requirements of this paragraph shall not apply to wind generators.
- 1.8.2 The Transmission Provider is required to pay the Interconnection Customer for reactive power that the Interconnection Customer provides or absorbs from the Small Generating Facility when the Transmission Provider requests the Interconnection Customer to operate its Small Generating Facility outside the range specified in article 1.8.1. In addition, if the Transmission Provider pays its own or affiliated generators for reactive power service within the specified range, it must also pay the Interconnection Customer.
- 1.8.3 Payments shall be in accordance with the Interconnection Customer's applicable rate schedule then in effect unless the provision of such service(s) is subject to a regional transmission organization or independent system operator FERC-approved rate schedule. To the extent that no rate schedule is in effect at the time the Interconnection Customer is required to provide or absorb reactive power under this Agreement, the Parties agree to expeditiously file such rate schedule and agree to support any request for waiver of the Commission's prior notice requirement in order to compensate the Interconnection Customer from the time service commenced.
- 1.9 Capitalized terms used herein shall have the meanings specified in the Glossary of Terms in Attachment 1 or the body of this Agreement.

Issued by: Darren Buck, PSOC Chair 4 Effective: May 1, 2007

Issued on: March IJuly 5, 2007

First Revised Sheet (Contract Number) (Interconnection Customer)

- Attachment 1 Glossary of Terms
- Attachment 2 Description and Costs of the Small Generating Facility, Interconnection Facilities, and Metering Equipment
- Attachment 3 One-line Diagram Depicting the Small Generating Facility, Interconnection Facilities, Metering Equipment, and Upgrades
- Attachment 4 Milestones
- Attachment 5 Additional Operating Requirements for the Transmission Provider's Transmission System and Affected Systems Needed to Support the Interconnection Customer's Needs
- Attachment 6 Transmission Provider's Description of its Upgrades and Best Estimate of Upgrade Costs
- Attachment 7 Interconnection Requirements For A Wind Generating Plant

Issued by: Darren Buck, PSOC Chair ii Effective: May 1, 2007

Issued on: March 1 July 5, 2007

(Contract Number)
(Interconnection Customer)

Attachment-7

Interconnection Requirements For A Wind Generating Plant

This Attachment 7 sets forth requirements and provisions specific to a wind generating plant. All other requirements of this SGIA continue to apply to small wind generating plant interconnections.

A. Technical Standards Applicable to a Wind Generating Plant

i. Low Voltage Ride Through (LVRT) Capability

A wind-generating plant shall be able to remain online during voltage disturbances up to the time periods and associated voltage levels set forth in the standard below. The LVRT standard provides for a transition period standard and a post-transition period standard.

<u> Transition Period LVRT Standard</u>

The transition period standard applies to small wind generating plants that have wind generating turbines subject to a wind turbine procurement contract executed prior to December 31, 2005, for delivery through 2007.

- 1. Wind generating plants are required to remain in service during three phase faults with normal clearing (which is a time period of approximately 4—9 cycles) and single line to ground faults with delayed clearing, and subsequent post-fault voltage recovery to prefault voltage unless clearing the fault effectively disconnects the generator from the system. The clearing time requirement for a three-phase fault will be specific to the wind generating plant substation location, as determined by and documented by the Transmission Provider. The maximum clearing time the wind generating plant shall be required to withstand for a three-phase fault shall be 9 cycles at a voltage as low as 0.15 p.u., as measured at the high side of the wind generating plant step-up transformer (i.e., the transformer that steps the voltage up to the transmission interconnection voltage or "GSU"), after which, if the fault remains following the location-specific normal clearing time for three phase faults, the wind generating plant may disconnect from the transmission system.
- 2. This requirement does not apply to faults that would occur between the wind generator terminals and the high side of the GSU or to faults that would result in a voltage lower than 0.15 per unit on the high side of the GSU serving the facility.

Issued by: Darren Buck, PSOC Chair 1 Effective: May 1, 2007

Issued on: March 1, 2007

(Contract Number) (Interconnection Customer)

- 3. Wind generating plants may be tripped after the fault period if this action is intended as part of a special protection system.
- 4. Wind generating plants may meet the LVRT requirements of this standard by the performance of the generators or by installing additional equipment (e.g., Static VAr Compensator, etc.) within the wind generating plant or by a combination of generator performance and additional equipment.
- 5. Existing individual generator units that are, or have been, interconnected to the network at the same location at the effective date of the Attachment 7 LVRT Standard are exempt from meeting the Attachment 7 LVRT Standard for the remaining life of the existing generation equipment. Existing individual generator units that are replaced are required to meet the Attachment 7 LVRT Standard.

---- Post-transition Period LVRT Standard

All small wind generating plants not covered by the transition period described above must meet the following requirements:

- 1. Wind generating plants are required to remain in service during three phase faults with normal clearing (which is a time period of approximately 4—9 cycles) and single line to ground faults with delayed clearing, and subsequent post-fault voltage recovery to prefault voltage unless clearing the fault effectively disconnects the generator from the system. The clearing time requirement for a three phase fault will be specific to the wind generating plant substation location, as determined by and documented by the Transmission Provider. The maximum clearing time the wind generating plant shall be required to withstand for a three-phase fault shall be 9 cycles after which, if the fault remains following the location specific normal clearing time for three-phase faults, the wind generating plant may disconnect from the transmission system. A wind generating plant shall remain interconnected during such a fault on the transmission system for a voltage level as low as zero volts, as measured at the high voltage side of the wind GSU.
- 2. This requirement does not apply to faults that would occur between the wind generator terminals and the high side of the GSU.
- 3. Wind generating plants may be tripped after the fault period if this action is intended as part of a special protection system.
- 4. Wind generating plants may meet the LVRT-requirements of this standard by the performance of the generators or by installing additional equipment (e.g., Static VAr Compensator) within the wind generating plant or by a combination of generator performance and additional equipment.

Issued by: Darren Buck, PSOC Chair 2 Effective: May 1, 2007

Issued on: March 1, 2007

(Contract Number)
(Interconnection Customer)

5. Existing individual generator units that are, or have been, interconnected to the network at the same location at the effective date of the Attachment 7 LVRT Standard are exempt from meeting the Attachment 7 LVRT Standard for the remaining life of the existing generation equipment. Existing individual generator units that are replaced are required to meet the Attachment 7 LVRT Standard.

- ii. Power Factor Design Criteria (Reactive Power)

A wind generating plant shall maintain a power factor within the range of 0.95 leading to 0.95 lagging, measured at the Point of Interconnection as defined in this SGIA, if the Transmission Provider's System Impact Study shows that such a requirement is necessary to ensure safety or reliability. The power factor range standard can be met by using, for example, power electronics designed to supply this level of reactive capability (taking into account any limitations due to voltage level, real power output, etc.) or fixed and switched capacitors if agreed to by the Transmission Provider, or a combination of the two. The Interconnection Customer shall not disable power factor equipment while the wind plant is in operation. Wind plants shall also be able to provide sufficient dynamic voltage support in lieu of the power system stabilizer and automatic voltage regulation at the generator excitation system if the System Impact Study shows this to be required for system safety or reliability.

-- iii. Supervisory Control and Data Acquisition (SCADA) Capability

The wind plant shall provide SCADA capability to transmit data and receive instructions from the Transmission Provider to protect system reliability. The Transmission Provider and the wind plant Interconnection Customer shall determine what SCADA information is essential for the proposed wind plant, taking into account the size of the plant and its characteristics, location, and importance in maintaining generation resource adequacy and transmission system reliability in its area.

Issued by: Darren Buck, PSOC Chair 3 Effective: May 1, 2007

Issued on: March 1, 2007

Unofficial FERC-Generated PDF of 20070709-0138 Received by FERC OSEC 07/06/2007 in Docket#: NJ07-2-001

ATTACHMENT B

First Revised Sheet (Contract Number) (Interconnection Customer)

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Issued by: Darren Buck, PSOC Chair ii Effective: May 1, 2007

Issued on: July 5, 2007

First Revised Sheet (Contract Number) (Interconnection Customer)

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Issued by: Darren Buck, PSOC Chair 4 Effective: May 1, 2007

Issued on: July 5, 2007