

Notice: Western Area Power Administration (WAPA) proposes revisions to its Open Access Transmission Tariff (OATT) to address FERC Order 845 (*Reform of Generator Interconnection Procedures and Agreements*)

(OATT Revision 21-01)

Per April 30, 2021 OASIS Notice: [WAPA-Proposed-OATT-Revision-21-01-Announcement.pdf](#)

April 30, 2021

Frequently Asked Questions (FAQs) - Version 1

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 845, and Order 1000. WAPA is proposing to address FERC Order 845 in this OATT Revision 21-01, 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 Order 845?**
Links to FERC's Order 845 are here: [Order No. 845](#), [Order No. 845-A](#) and [Order No. 845-B](#)
3. **What are the primary changes that FERC required under Order 845?**
See Exhibit #1 below.
4. **What WAPA Region's will be impacted by these OATT revisions?**
These OATT revisions will impact 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 to those UGP facilities are processed under the SPP Tariff. SPP has already included FERC Order 845 requirements into the SPP Tariff.
5. **What portions of the WAPA OATT will be revised?**
The proposed OATT revisions are included only in the Large Generator Interconnection Procedures (LGIP) and/or Large Generator Interconnection Agreement (LGIA). These changes do not impact the Small Generator Interconnection Procedures or Agreement (SGIP/SGIA).
6. **Is WAPA going to seek comments on all proposed OATT revisions during the informal stakeholder comment process for OATT Revision 20-02?**
WAPA will be seeking comments on all proposed OATT revisions under this OATT Revision 21-



Western Area Power Administration

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7. **When does WAPA plan to post the proposed OATT revisions?**

WAPA plans to post the proposed OATT revisions for OATT Revision 21-01 prior to the May 24, 2021, Stakeholder Meeting. WAPA also plans to provide notice of this posting via electronic mail to its customers/stakeholders.

8. **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 21-01 and is posting information for stakeholders on WAPA's OASIS sites. WAPA plans to hold an information meeting (via Webex) on May 24, 2021 (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.

9. **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.

10. **When will WAPA make a final decision on the OATT revisions?**

Following the completion of the informal stakeholder process.

11. **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 May 24, 2021, Stakeholder Meeting.

12. **Where is information regarding the proposed OATT revisions available?**

On WAPA's OASIS sites, available directly on the [WAPA OATT Revision Information webpage](#).

13. **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 (steward@wapa.gov);
- Rocky Mountain Region (RMR) and Colorado River Storage Project (CRSP): Raymond Vojdani at 970-461-7379 (avojdani@wapa.gov);
- Sierra Nevada Region (SNR): Ira Witherspoon at 916-353-4659 (withersp@wapa.gov);
- Upper Great Plains Region (UGP): Steve Sanders at 406-255-2840 (sanders@wapa.gov)

**Exhibit #1
Summary of Changes required by FERC under Order 845**

In Order 845, FERC adopted ten proposed reforms to the *pro forma* Large Generator Interconnection Procedures (LGIP) and Large Generator Interconnection Agreement (LGIA) for Transmission Providers (TPs):

- 1) To improve certainty for Interconnection Customer (IC) by:
 - a) enabling IC to exercise option to build, regardless of whether TP can meet IC's construction dates; and
 - b) imposing a revised dispute resolution requirement on all TPs.
- 2) To promote more informed interconnection decisions by:
 - a) requiring all TPs to publish a method for identifying contingent facilities;
 - b) requiring TPs to offer access to study processes and assumptions for maintaining network models used;
 - c) altering the definition of "Generating Facility" in the LGIP and LGIA to include electric storage resources; and
 - d) requiring TPs to post interconnection study reporting requirements on a quarterly basis.
- 3) To enhance the efficiency of the interconnection process by:
 - a) enabling ICs to request interconnection service at a level lower than their generating facility capacity;
 - b) requiring TPs to allow agreements for provisional interconnection service before completion of full process;
 - c) requiring TPs to develop an expedited process for ICs to use or transfer surplus interconnection service; and
 - d) requiring TPs to establish a procedure to assess if IC's proposed technology constitutes a material modification.