

**Western Area Power Administration (WAPA)
Surplus Interconnection Service
Business Practice**

The Federal Energy Regulatory Commission's (FERC) Order No. 845 revised Section 1 of the *pro forma* Large Generator Interconnection Procedures (LGIP) to incorporate the new term Surplus Interconnection Service, which is defined as "any unneeded portion of Interconnection Service established in a Large Generator Interconnection Agreement, such that if Surplus Interconnection Service is utilized, the total amount of Interconnection Service at the Point of Interconnection would remain the same." Moreover, Order No. 845 directed each Transmission Provider to propose under Section 3.3 of its LGIP a non-*pro forma* expedited process for using Surplus Interconnection Service at existing Points of Interconnection.

Requests for Surplus Interconnection Service will be noted in the Transmission Provider's Generation Interconnection Queue listings on its OASIS sites. Such requests will be processed on an "out-of-queue" basis from the other non-Surplus Interconnection Service requests and will be granted if the Transmission Provider determines that no new impacts to the Transmission System are identified pursuant to the OATT provisions. Requests for Surplus Interconnection Service will be processed in the order that such requests are received.

Generating Facilities that the Transmission Provider grants Surplus Interconnection Service to shall be subject to the Transmission Provider's Environmental Review requirements prior to interconnection or energization from Transmission Provider's Transmission System, and to any other necessary operating restrictions and coordination requirements outlined in operating guides that the Transmission Provider will develop.

In accordance with Order No. 845, Section 3.3 of WAPA's LGIP sets forth detailed requirements and timelines for requesting, studying, and utilizing Surplus Interconnection Service. However, neither the *pro forma* LGIP nor WAPA's LGIP explicitly provide for Surplus Interconnection Service Requests at Points of Interconnection where the Generating Facility interconnection was completed prior to FERC's requirement that a Large Generator Interconnection Agreement (LGIA) be executed to govern the terms and conditions of the Interconnection Service. This Business Practice addresses the treatment of such Surplus Interconnection Service Requests, and also the treatment of Surplus Interconnection Service Requests at Points of Interconnection where the Generating Facility is owned by a Federal agency.

Treatment of Surplus Interconnection Service Requests Associated with Pre-LGIA Generator Interconnection Agreements

The following conditions apply to Surplus Interconnection Service Requests at Points of Interconnection where the Generating Facility interconnection was completed prior to the requirement that an LGIA be executed to govern the terms and conditions of the Interconnection Service:

- WAPA will treat the existing Interconnection Customer's currently effective interconnection agreement (Pre-LGIA Agreement) as the "existing LGIA" and "Existing Customer's LGIA" as those terms are used under Section 3.3 and Appendix 1 of WAPA's LGIP.
- If the Pre-LGIA Agreement contains references and terms that are not stated and/or defined identically to those in WAPA's LGIP, WAPA will treat such phrases and terms the same as their equivalents in WAPA's LGIP. As examples only, if a Pre-LGIA Agreement specifies amounts of "net MW generating capability" and "maximum MW injected at the point of interconnection," then WAPA will respectively treat those specified amounts as the Generating Facility Capacity and Interconnection Service Level for purposes of processing the Surplus Interconnection Service Request.
- Similar to Section 3.3.6.5 of WAPA's LGIP, if the Pre-LGIA Agreement explicitly provides only for the equivalent of Energy Resource Interconnection Service (ERIS) and/or WAPA has historically provided only the equivalent of ERIS under that agreement, any associated Surplus Interconnection Service Requests may only be for ERIS. If the Pre-LGIA Agreement explicitly provides for the equivalent of Network Resource Interconnection Service (NRIS) and/or WAPA has historically provided the equivalent of NRIS under that agreement, any associated Surplus Interconnection Service Requests may be for either ERIS or NRIS.
- Regardless of whether the Pre-LGIA Agreement pertains to the interconnection of a Large Generating Facility, any associated Surplus Interconnection Service Requests must be submitted and will be processed pursuant to Section 3.3 of WAPA's LGIP.

Treatment of Surplus Interconnection Service Requests Associated with Federally-Owned Generating Facilities

The following conditions apply to Surplus Interconnection Service Requests at Points of Interconnection where the Generating Facility is owned by a Federal agency:

- The applicable WAPA Regional Marketing Function will act as the agent on behalf of the Federal generating agency (i.e., either the U.S. Army Corps of Engineers or the U.S. Department of Interior's Bureau of Reclamation) that is the existing Interconnection Customer. The Marketing Function contact information can be obtained from the appropriate WAPA Regional Transmission Function point of contact indicated on this OASIS

page: <https://www.oasis.oati.com/woa/docs/WAPA/WAPAdocs/Western-Common-Business-Practices.html>

- WAPA's Marketing Function, in coordination with the applicable Federal generating agency, will determine if any unneeded Interconnection Service exists for use as Surplus Interconnection Service. Various factors will be considered in the analysis, including but not limited to relevant Federal statutory and marketing program limitations and the variability of the Federal generation.
- The parties to the Surplus Interconnection Service Agreement, if any, will be WAPA as the Transmission Provider, WAPA's Marketing Function as the agent acting on behalf of the applicable Federal generating agency, and the Surplus Interconnection Service Customer.

Limitation on total combined Generating Facility output at the Point of Interconnection

To clarify the implementation of LGIP Sections 3.3.5.2 and 3.3.6.6, the Transmission Provider will limit the total combined Generating Facility output (i.e., real-time power output of the Surplus Interconnection Service Customer's and existing Interconnection Customer's Generating Facilities associated with Surplus Interconnection Service at the Point of Interconnection) to the maximum interconnection service (Interconnection Service Limit) allowed under the associated existing Interconnection Customer's LGIA. The installed Generating Facility Capacity for a combination of Generating Facilities associated with Surplus Interconnection Service can exceed its associated Interconnection Service Limit, pursuant to the OATT.