

December 20, 2010

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Southwest Power Pool, Inc.*, Docket No. ER11-____-000
Compliance Filing In Accordance With November 18, 2010 Order Issued
In Docket No. ER09-1254-002

Dear Secretary Bose:

I. DESCRIPTION OF COMPLIANCE FILING

On June 1, 2009, in the above captioned docket, Southwest Power Pool, Inc. (“SPP”) submitted for filing amendments to its Open Access Transmission Tariff (“SPP Tariff”) to reform its generation interconnection procedures to increase the efficiency of the generation interconnection process, decrease future queue backlogs, and promote the interconnection of viable generation projects to the grid.¹

On July 31, 2009, the Commission conditionally accepted, subject to a compliance filing, the reformed procedures effective June 2, 2009.² SPP made that compliance filing on August 31, 2009.³ The Commission accepted the August 31 Compliance Filing on December 17, 2009, subject to a further limited compliance filing.⁴

In the December 17 Order, the Commission instructed SPP to revise section 3.3.1 of Attachment V of the SPP Tariff (1) to include the URL for its interconnection business

¹ *Southwest Power Pool, Inc.*, Submission of Revisions to Open Access Transmission Tariff to Reform Generation Interconnection Procedures, Docket No. ER09-1254-000 (June 1, 2009) (“June 1 Filing”).

² *Sw. Power Pool, Inc.*, 128 FERC ¶ 61,114, at P 1 (2009).

³ *Sw. Power Pool, Inc.*, Submission of Revisions to Open Access Transmission Tariff to Reform Generation Interconnection Procedures, Docket No. ER09-1254-001 (Aug. 31, 2009) (“August 31 Compliance Filing”).

⁴ *Sw. Power Pool, Inc.*, 129 FERC ¶ 61,226 (2009) (“December 17 Order”).

practices regarding site control and site adequacy standards; and (2) to provide the criteria SPP will consider in evaluating alternative demonstrations of site control on a non-discriminatory basis and to state that, if an alternative demonstration of site control meets SPP's objective criteria, SPP will accept the alternative demonstration of site control.⁵ The Commission also directed SPP to include a definition of site adequacy in its tariff and revise its interconnection business practices to articulate the difference between the site control and site adequacy standards, or, if there is no difference between the terms revise section 8.2(a) of its interconnection procedures to remove mention of site adequacy.⁶

On January 19, 2010, SPP made a compliance filing to address these issues.⁷ On November 18, 2010, the Commission accepted the January 19 Compliance Filing, subject to a further limited compliance filing.⁸ Specifically, the Commission instructed SPP to revise section 3.3.1 of Attachment V of the SPP Tariff: (1) to correct the URL for its interconnection business practices regarding site control standards;⁹ (2) to clarify that an Interconnection Customer may make changes to its layout drawing during the preliminary queue phase;¹⁰ and (3) to state that after SPP approves a final layout drawing during the definitive queue phase, any subsequent change to the layout drawing will be evaluated to determine whether it constitutes a material modification under section 4.4 of Attachment V of the SPP Tariff.¹¹ This compliance filing responds to these directives.

II. DESCRIPTION OF COMPLIANCE TARIFF REVISIONS

A. Revisions To Section 3.3.1 of Attachment V

To comply with the November 18 Order, SPP first amends section 3.3.1 to remove three extraneous characters from the URL address for its interconnection business practices regarding site control standards. Specifically, SPP removes the "%20" between "Posting" and ".pdf" in section 3.3.1, as directed.¹² The revised URL provides the correct web address for SPP's interconnection business practices.

⁵ *Id.* at PP 14, 15.

⁶ *Id.* at P 16.

⁷ *See Sw. Power Pool, Inc.*, Submission of Compliance Filing, Docket No. ER09-1254-002 (Jan. 19, 2010) ("January 19 Compliance Filing").

⁸ *Sw. Power Pool, Inc.*, 133 FERC ¶ 61,139 (Nov. 18, 2010) ("November 18 Order").

⁹ *Id.* at P 34.

¹⁰ *Id.* at P 28.

¹¹ November 18 Order at P 29.

¹² *Id.* at P 34 & n.44.

Second, SPP adds a sentence to section 3.3.1 to clarify that an Interconnection Customer is allowed to modify the layout drawing of its project at any time until it submits the project into the Definitive Interconnection System Impact Study (“DISIS”) Queue. This change comports with the Commission’s directive to provide that the Interconnection Customer may modify its layout drawing during the preliminary queue stage.¹³

Finally, SPP amends section 3.3.1 to provide that once the Interconnection Request is submitted into the DISIS Queue and SPP has approved the final layout drawing and demonstration of site control, any subsequent modification of the layout drawing will be evaluated to determine whether the change constitutes a material modification under section 4.4 (of Attachment V of the SPP Tariff). This revision complies with the Commission’s directive in the November 18 Order to clarify that SPP will review any change to the final layout drawing submitted in the Definitive Planning Phase to determine whether such change constitutes a material modification under section 4.4.¹⁴

III. EFFECTIVE DATE

Consistent with the November 18 Order, SPP requests an effective date of June 2, 2009, for the SPP Tariff compliance amendments filed herein.¹⁵ Because the effective date of the compliance amendments is prior to the effective date of SPP’s baseline electronic filing (July 26, 2010),¹⁶ SPP includes in clean and redline format revised tariff sheets of Attachment V, section 3.3.1 of the Fifth Revised version of the SPP Tariff.¹⁷ SPP also includes in both clean and redline format Attachment V, section 3 in electronic format for effectiveness after July 26, 2010.¹⁸

¹³ November 18 Order at P 28.

¹⁴ *Id.* at P 29.

¹⁵ *Id.* at Ordering para (A).

¹⁶ *Sw. Power Pool, Inc.*, Letter Order, Docket No. ER10-1069-000 (Oct. 28, 2010). The SPP baseline electronic tariff already includes the revisions approved in Docket No. ER10-681-000.

¹⁷ SPP includes in clean and redline format revised tariff sheets effective March 31, 2010, to reflect the tariff revisions accepted by the Commission in the March 26, 2010 letter order in Docket No. ER10-681-000 and the November 18 Order. *See Sw. Power Pool, Inc.*, Letter Order, Docket No. ER10-681-000 (Mar. 26, 2010).

¹⁸ On December 17, 2010, SPP submitted a ministerial filing in Docket No. ER11-2401-000 to incorporate the tariff language accepted in the November 18 Order into SPP’s baseline electronic tariff.

IV. DOCUMENTS SUBMITTED WITH THIS FILING

SPP encloses with this filing:

- (1) This transmittal letter;
- (2) Revised tariff sheets of the Fifth Revised version of the SPP Tariff in clean and redline format, effective June 2, 2009;
- (3) SPP Tariff compliance amendments in electronic format in clean and redline format, effective July 26, 2010; and
- (4) Certificate of Service.

V. CONCLUSION

For the reasons stated above, SPP requests that the Commission accept the SPP Tariff compliance amendments filed herein, effective June 2, 2009.

Respectfully submitted,



Barry S. Spector
Carrie L. Bumgarner
Ryan J. Collins

**Attorneys for
Southwest Power Pool, Inc.**

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 at Washington, D.C., this 20th day of December 2010.

A handwritten signature in cursive script, reading "Carrie L. Bumgarner". The signature is written in black ink and is positioned above the printed name.

Carrie L. Bumgarner

3.3 Valid Interconnection Request.

3.3.1 Initiating an Interconnection Request.

To initiate an Interconnection Request, Interconnection Customer must submit all of the following: (i) a \$10,000 deposit, (ii) a completed application in the form of Appendix 1, and (iii) demonstration of Site Control; provided, however, demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. Specifications for acceptable site size for the purpose of demonstrating Site Control are posted on the Transmission Provider's website, available at: <http://spppoasis.spp.org/documents/swpp/transmission/studies/Interconnection%20Request%20Guidelines%20for%20Posting.pdf>.; Interconnection Customer may propose an alternative site size for Transmission Provider approval. Transmission Provider shall approve a demonstration of Site Control with an alternative site size when the Interconnection Customer submits to Transmission Provider a final layout drawing of the Generating Facility that includes at a minimum: (i) the spacing and number of turbines; (ii) the cable requirements to interconnect the individual turbines to the collector substation and the cable requirements from the collector substation to the interconnection substation; (iii) the resistance and impedance measurements of the interconnecting cable and (iv) acknowledgment by Interconnection Customer that the layout drawing is intended to be final and not subsequently substantially changed. Interconnection Customer may modify the layout drawing of a project until it submits an Interconnection Request into the DISIS Queue. Once an Interconnection Request has been submitted in the DISIS Queue, and Transmission Provider has approved the final layout drawing and demonstration of Site Control, any subsequent change to the design of the Generating Facility as depicted in the layout drawing will be subject to Section 4.4 and will be evaluated to determine whether the change constitutes a Material Modification under Section 4.4. Deposits provided pursuant to this section shall be applied toward any Interconnection Studies pursuant to the Interconnection Request.

The expected In-Service Date of the new Large Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Large Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

Issued by: Heather H. Starnes, Manager, Regulatory Policy

Issued on: December 20, 2010

Effective: June 2, 2009

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The expected In-Service Date of the new Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

Issued by: Heather H. Starnes, Manager, Regulatory Policy

Issued on: December 20, 2010

Effective: March 31, 2010

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The expected In-Service Date of the new Large Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Large Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where

Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

Issued by: Heather H. Starnes, Manager, Regulatory Policy

Issued on: December 20, 2010

Effective: June 2, 2009

3.3 Valid Interconnection Request.

3.3.1 Initiating an Interconnection Request.

To initiate an Interconnection Request, Interconnection Customer must submit all of the following: (i) a \$10,000 deposit, (ii) a completed application in the form of Appendix 1, and (iii) demonstration of Site Control; provided, however, demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. Specifications for acceptable site size for the purpose of demonstrating Site Control are posted on the Transmission Provider's website, available at: <http://spppoasis.spp.org/documents/swpp/transmission/studies/Interconnection%20Request%20Guidelines%20for%20Posting%20.pdf>;

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The expected In-Service Date of the new Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where

Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

Issued by: Heather H. Starnes, Manager, Regulatory Policy

Issued on: December 20, 2010

Effective: March 31, 2010

Section 3. Interconnection Requests

3.1 General.

An Interconnection Customer shall submit to Transmission Provider an Interconnection Request in the form of Appendix 1 to this GIP and the deposit along with the other items in Section 3.3.1 of these Generator Interconnection Procedures. Transmission Provider shall apply the deposit toward the cost of the applicable Interconnection Study. Interconnection Customer shall submit a separate Interconnection Request for each site and may submit multiple Interconnection Requests for a single site. Interconnection Customer must submit a deposit with each Interconnection Request even when more than one request is submitted for a single site. An Interconnection Request to evaluate one site at two different voltage levels shall be treated as two Interconnection Requests.

At Interconnection Customer's option, Transmission Provider and Interconnection Customer will identify alternative Point(s) of Interconnection and configurations at the Scoping Meeting to evaluate in this process and attempt to eliminate alternatives in a reasonable fashion given resources and information available. Interconnection Customer will select the definitive Point(s) of Interconnection to be studied no later than the execution of the Interconnection Feasibility Study Agreement.

3.2 Identification of Types of Interconnection Services.

At the time the Interconnection Request is submitted, Interconnection Customer must request either Energy Resource Interconnection Service or Network Resource Interconnection Service, as described; provided, however, any Interconnection Customer requesting Network Resource Interconnection Service may also request that it be concurrently studied for Energy Resource Interconnection Service, up to the point when an Interconnection Facility Study Agreement is executed. Interconnection Customer may then elect to proceed with Network Resource Interconnection Service or to proceed under a lower level of interconnection service to the extent that only certain upgrades will be completed.

3.2.1 Energy Resource Interconnection Service.

3.2.1.1 The Product. Energy Resource Interconnection Service allows Interconnection Customer to connect the Generating Facility to the Transmission System and be eligible to deliver the Generating Facility's output using the existing firm or non-firm capacity of the Transmission System on an "as available" basis. Energy Resource Interconnection Service does not in and of itself convey any right to deliver electricity to any specific customer or Point of Delivery.

3.2.1.2 The Study. The study consists of short circuit/fault duty, steady state (thermal and voltage) and stability analyses. The short circuit/fault duty analysis would identify direct Interconnection Facilities required and the Network Upgrades necessary to address

short circuit issues associated with the Interconnection Facilities. The stability and steady state studies would identify necessary upgrades to allow full output of the proposed Generating Facility and would also identify the maximum allowed output, at the time the study is performed, of the interconnecting Generating Facility without requiring additional Network Upgrades.

3.2.2 Network Resource Interconnection Service.

3.2.2.1 The Product. Transmission Provider must conduct the necessary studies and the Transmission Owner construct the Network Upgrades needed to integrate the Generating Facility in a manner comparable to that in which Transmission Owner integrates its generating facilities to serve Native Load Customers as Network Resources. Network Resource Interconnection Service allows Interconnection Customer's Generating Facility to be designated as a Network Resource, up to the Generating Facility's full output, on the same basis as existing Network Resources interconnected to Transmission Provider's Transmission System, and to be studied as a Network Resource on the assumption that such a designation will occur.

3.2.2.2 The Study. The Interconnection Study for Network Resource Interconnection Service shall assure that Interconnection Customer's Generating Facility meets the requirements for Network Resource Interconnection Service and as a general matter, that such Generating Facility's interconnection is also studied with Transmission System at peak load, under a variety of severely stressed conditions, to determine whether, with the Generating Facility at full output, the aggregate of generation in the local area can be delivered to the aggregate of load on Transmission System, consistent with Applicable Reliability Standards. This approach assumes that some portion of existing Network Resources are displaced by the output of Interconnection Customer's Generating Facility. Network Resource Interconnection Service in and of itself does not convey any right to deliver electricity to any specific customer or Point of Delivery. The Transmission Provider may also study the Transmission System under non-peak load conditions. However, upon request by the Interconnection Customer, the Transmission Provider must explain in writing to the Interconnection Customer why the study of non-peak load conditions is required for reliability purposes.

3.3 Valid Interconnection Request.

3.3.1 Initiating an Interconnection Request.

To initiate an Interconnection Request, Interconnection Customer must submit all of the following: (i) a \$10,000 deposit, (ii) a completed application in the form of Appendix 1, and (iii) demonstration of Site Control; provided, however, demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. Specifications for acceptable site size for the purpose of demonstrating Site Control are posted on the Transmission Provider's website, available at: <http://sppoasis.spp.org/documents/swpp/transmission/studies/Interconnection%20Request%20Guidelines%20for%20Posting.pdf>.; Interconnection Customer may propose an alternative site size for Transmission Provider approval. Transmission Provider shall approve a demonstration of Site Control with an alternative site size when the Interconnection Customer submits to Transmission Provider a final layout drawing of the Generating Facility that includes at a minimum: (i) the spacing and number of turbines; (ii) the cable requirements to interconnect the individual turbines to the collector substation and the cable requirements from the collector substation to the interconnection substation; (iii) the resistance and impedance measurements of the interconnecting cable and (iv) acknowledgment by Interconnection Customer that the layout drawing is intended to be final and not subsequently substantially changed. Interconnection Customer may modify the layout drawing of a project until it submits an Interconnection Request into the DISIS Queue. Once an Interconnection Request has been submitted in the DISIS Queue, and Transmission Provider has approved the final layout drawing and demonstration of Site Control, any subsequent change to the design of the Generating Facility as depicted in the layout drawing will be subject to Section 4.4 and will be evaluated to determine whether the change constitutes a Material Modification under Section 4.4. Deposits provided pursuant to this section shall be applied toward any Interconnection Studies pursuant to the Interconnection Request.

The expected In-Service Date of the new Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

3.3.2 Acknowledgment of Interconnection Request.

Transmission Provider shall acknowledge receipt of the Interconnection Request within five (5) Business Days of receipt of the request and attach a copy of the received Interconnection Request to the acknowledgement.

3.3.3 Deficiencies in Interconnection Request.

An Interconnection Request will not be considered to be a valid request until all items in Section 3.3.1 have been received by Transmission Provider; provided however, that demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. If an Interconnection Request fails to meet the requirements set forth in Section 3.3.1, Transmission Provider shall notify Interconnection Customer within five (5) Business Days of receipt of the initial Interconnection Request of the reasons for such failure and that the Interconnection Request does not constitute a valid request. Interconnection Customer shall provide Transmission Provider the additional requested information needed to constitute a valid request within ten (10) Business Days after receipt of such notice. Failure by Interconnection Customer to comply with this Section 3.3.3 shall be treated in accordance with Section 3.6.

3.3.4 Scoping Meeting.

Within ten (10) Business Days after receipt of a valid Interconnection Request, Transmission Provider shall establish a date agreeable to the Transmission Owner and the Interconnection Customer for the Scoping Meeting, and such date shall be no later than thirty (30) Calendar Days from receipt of the valid Interconnection Request, unless otherwise mutually agreed upon by the Parties.

The purpose of the Scoping Meeting shall be to discuss alternative interconnection options, to exchange information including any transmission data that would reasonably be expected to impact such interconnection options, to analyze such information and to determine the potential feasible Points of Interconnection. Transmission Provider, Transmission Owner and Interconnection Customer shall provide such technical data,

including, but not limited to: (i) general facility loadings, (ii) general instability issues, (iii) general short circuit issues, (iv) general voltage issues, and (v) general reliability issues as may be reasonably required to accomplish the purpose of the meeting. Transmission Provider, Transmission Owner and Interconnection Customer will also make available personnel and other resources as may be reasonably required to accomplish the purpose of the meeting in the time allocated for the meeting. On the basis of the meeting, Interconnection Customer shall designate its Point of Interconnection, pursuant to Section 6.1, and one or more available alternative Point(s) of Interconnection. The duration of the meeting shall be sufficient to accomplish its purpose.

3.4 OASIS Posting.

Transmission Provider will maintain on its OASIS a list of all Interconnection Requests. The list will identify, for each Interconnection Request: (i) the maximum summer and winter megawatt electrical output; (ii) the location by county and state; (iii) the station or transmission line or lines where the interconnection will be made; (iv) the projected In-Service Date; (v) the status of the Interconnection Request, including Queue Position; (vi) the type of Interconnection Service being requested; and (vii) the availability of any studies related to the Interconnection Request; (viii) the date of the Interconnection Request; (ix) the type of Generating Facility to be constructed (combined cycle, base load or combustion turbine and fuel type); and (x) for Interconnection Requests that have not resulted in a completed interconnection, an explanation as to why it was not completed. The list will not disclose the identity of Interconnection Customer until Interconnection Customer executes a GIA or requests that Transmission Provider file an unexecuted GIA with FERC. Transmission Provider shall post to its OASIS site any deviations from the study timelines set forth herein. Interconnection Study reports and Re-Study reports shall be posted to Transmission Provider's OASIS site subsequent to the meeting between Interconnection Customer and Transmission Provider to discuss the applicable study results. Transmission Provider shall also post any known deviations in the Generating Facility's In-Service Date.

3.5 Coordination with Affected Systems.

Transmission Provider will coordinate the conduct of any studies required to determine the impact of the Interconnection Request on Affected Systems with Affected System Operators and, if possible, include those results (if available) in its applicable Interconnection Study within the time frame specified in this GIP. Transmission Provider will include such Affected System Operators in all meetings held with Interconnection Customer as required by this GIP. Interconnection Customer will cooperate with Transmission Provider in all matters related to the conduct of studies and the determination of modifications to Affected Systems. A Transmission Provider which may be an Affected System shall cooperate with Transmission Provider with whom interconnection has been requested in all matters related to the conduct of studies and the determination of modifications to Affected Systems.

3.6 Withdrawal.

Interconnection Customer may withdraw its Interconnection Request at any time by written notice of such withdrawal to Transmission Provider. In addition, if Interconnection Customer fails to adhere to all requirements of this GIP, except as provided in Section 13.5 (Disputes), Transmission Provider shall deem the Interconnection Request to be withdrawn and shall provide written notice to Interconnection Customer of the deemed withdrawal and an explanation of the reasons for such deemed withdrawal. Upon receipt of such written notice,

Interconnection Customer shall have fifteen (15) Business Days in which to either respond with information or actions that cures the deficiency or to notify Transmission Provider of its intent to pursue Dispute Resolution.

Withdrawal shall result in the loss of Interconnection Customer's Queue Position. If an Interconnection Customer disputes the withdrawal and loss of its Queue Position, then during Dispute Resolution, Interconnection Customer's Interconnection Request is eliminated from the Queue until such time that the outcome of Dispute Resolution would restore its Queue Position. An Interconnection Customer that withdraws or is deemed to have withdrawn its Interconnection Request shall pay to Transmission Provider all costs that Transmission Provider prudently incurs with respect to that Interconnection Request prior to Transmission Provider's receipt of notice described above. Interconnection Customer must pay all monies due to Transmission Provider before it is allowed to obtain any Interconnection Study data or results.

Transmission Provider shall (i) update the OASIS Queue Position posting and (ii) refund to Interconnection Customer any portion of Interconnection Customer's deposit or study payments that exceeds the costs that Transmission Provider has incurred, including interest calculated in accordance with section 35.19a(a)(2) of FERC's regulations. In the event of such withdrawal, Transmission Provider, subject to the confidentiality provisions of Section 13.1, shall provide, at Interconnection Customer's request, all information that Transmission Provider developed for any completed study conducted up to the date of withdrawal of the Interconnection Request.

Section 3. Interconnection Requests

3.1 General.

An Interconnection Customer shall submit to Transmission Provider an Interconnection Request in the form of Appendix 1 to this GIP and the deposit along with the other items in Section 3.3.1 of these Generator Interconnection Procedures. Transmission Provider shall apply the deposit toward the cost of the applicable Interconnection Study. Interconnection Customer shall submit a separate Interconnection Request for each site and may submit multiple Interconnection Requests for a single site. Interconnection Customer must submit a deposit with each Interconnection Request even when more than one request is submitted for a single site. An Interconnection Request to evaluate one site at two different voltage levels shall be treated as two Interconnection Requests.

At Interconnection Customer's option, Transmission Provider and Interconnection Customer will identify alternative Point(s) of Interconnection and configurations at the Scoping Meeting to evaluate in this process and attempt to eliminate alternatives in a reasonable fashion given resources and information available. Interconnection Customer will select the definitive Point(s) of Interconnection to be studied no later than the execution of the Interconnection Feasibility Study Agreement.

3.2 Identification of Types of Interconnection Services.

At the time the Interconnection Request is submitted, Interconnection Customer must request either Energy Resource Interconnection Service or Network Resource Interconnection Service, as described; provided, however, any Interconnection Customer requesting Network Resource Interconnection Service may also request that it be concurrently studied for Energy Resource Interconnection Service, up to the point when an Interconnection Facility Study Agreement is executed. Interconnection Customer may then elect to proceed with Network Resource Interconnection Service or to proceed under a lower level of interconnection service to the extent that only certain upgrades will be completed.

3.2.1 Energy Resource Interconnection Service.

3.2.1.1 The Product. Energy Resource Interconnection Service allows Interconnection Customer to connect the Generating Facility to the Transmission System and be eligible to deliver the Generating Facility's output using the existing firm or non-firm capacity of the Transmission System on an "as available" basis. Energy Resource Interconnection Service does not in and of itself convey any right to deliver electricity to any specific customer or Point of Delivery.

3.2.1.2 The Study. The study consists of short circuit/fault duty, steady state (thermal and voltage) and stability analyses. The short circuit/fault duty analysis would identify direct Interconnection Facilities required and the Network Upgrades necessary to address

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3.2.2 Network Resource Interconnection Service.

3.2.2.1 The Product. Transmission Provider must conduct the necessary studies and the Transmission Owner construct the Network Upgrades needed to integrate the Generating Facility in a manner comparable to that in which Transmission Owner integrates its generating facilities to serve Native Load Customers as Network Resources. Network Resource Interconnection Service allows Interconnection Customer's Generating Facility to be designated as a Network Resource, up to the Generating Facility's full output, on the same basis as existing Network Resources interconnected to Transmission Provider's Transmission System, and to be studied as a Network Resource on the assumption that such a designation will occur.

3.2.2.2 The Study. The Interconnection Study for Network Resource Interconnection Service shall assure that Interconnection Customer's Generating Facility meets the requirements for Network Resource Interconnection Service and as a general matter, that such Generating Facility's interconnection is also studied with Transmission System at peak load, under a variety of severely stressed conditions, to determine whether, with the Generating Facility at full output, the aggregate of generation in the local area can be delivered to the aggregate of load on Transmission System, consistent with Applicable Reliability Standards. This approach assumes that some portion of existing Network Resources are displaced by the output of Interconnection Customer's Generating Facility. Network Resource Interconnection Service in and of itself does not convey any right to deliver electricity to any specific customer or Point of Delivery. The Transmission Provider may also study the Transmission System under non-peak load conditions. However, upon request by the Interconnection Customer, the Transmission Provider must explain in writing to the Interconnection Customer why the study of non-peak load conditions is required for reliability purposes.

3.3 Valid Interconnection Request.

3.3.1 Initiating an Interconnection Request.

To initiate an Interconnection Request, Interconnection Customer must submit all of the following: (i) a \$10,000 deposit, (ii) a completed application in the form of Appendix 1, and (iii) demonstration of Site Control; provided, however, demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. Specifications for acceptable site size for the purpose of demonstrating Site Control are posted on the Transmission Provider's website, available at: <http://spooasis.spp.org/documents/swpp/transmission/studies/Interconnection%20Request%20Guidelines%20for%20Posting%20.pdf>;

Interconnection Customer may propose an alternative site size for Transmission Provider approval. Transmission Provider shall approve a demonstration of Site Control with an alternative site size when the Interconnection Customer submits to Transmission Provider a final layout drawing of the Generating Facility that includes at a minimum: (i) the spacing and number of turbines; (ii) the cable requirements to interconnect the individual turbines to the collector substation and the cable requirements from the collector substation to the interconnection substation; (iii) the resistance and impedance measurements of the interconnecting cable and (iv) acknowledgment by Interconnection Customer that the layout drawing is intended to be final and not subsequently substantially changed. Interconnection Customer may modify the layout drawing of a project until it submits an Interconnection Request into the DISIS Queue. Once an Interconnection Request has been submitted in the DISIS Queue, and After Transmission Provider has approved approval of the final layout drawing and demonstration of Site Control, any subsequent change to the design of the Generating Facility as depicted in the layout drawing will be subject to Section 4.4.3, and will be evaluated to determine whether the change constitutes a Material Modification under Section 4.4. Deposits provided pursuant to this section shall be applied toward any Interconnection Studies pursuant to the Interconnection Request.

The expected In-Service Date of the new Generating Facility or increase in capacity of the existing Generating Facility shall be no more than the process window for the regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the new Generating Facility or increase in capacity of the existing Generating Facility will take longer than the regional expansion planning period. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

3.3.2 Acknowledgment of Interconnection Request.

Transmission Provider shall acknowledge receipt of the Interconnection Request within five (5) Business Days of receipt of the request and attach a copy of the received Interconnection Request to the acknowledgement.

3.3.3 Deficiencies in Interconnection Request.

An Interconnection Request will not be considered to be a valid request until all items in Section 3.3.1 have been received by Transmission Provider; provided however, that demonstration of Site Control is not required for inclusion of an Interconnection Request in the Interconnection Feasibility Study Queue. If an Interconnection Request fails to meet the requirements set forth in Section 3.3.1, Transmission Provider shall notify Interconnection Customer within five (5) Business Days of receipt of the initial Interconnection Request of the reasons for such failure and that the Interconnection Request does not constitute a valid request. Interconnection Customer shall provide Transmission Provider the additional requested information needed to constitute a valid request within ten (10) Business Days after receipt of such notice. Failure by Interconnection Customer to comply with this Section 3.3.3 shall be treated in accordance with Section 3.6.

3.3.4 Scoping Meeting.

Within ten (10) Business Days after receipt of a valid Interconnection Request, Transmission Provider shall establish a date agreeable to the Transmission Owner and the Interconnection Customer for the Scoping Meeting, and such date shall be no later than thirty (30) Calendar Days from receipt of the valid Interconnection Request, unless otherwise mutually agreed upon by the Parties.

The purpose of the Scoping Meeting shall be to discuss alternative interconnection options, to exchange information including any transmission data that would reasonably be expected to impact such interconnection options, to analyze such information and to determine the potential feasible Points of Interconnection. Transmission Provider, Transmission Owner and Interconnection Customer shall provide such technical data,

including, but not limited to: (i) general facility loadings, (ii) general instability issues, (iii) general short circuit issues, (iv) general voltage issues, and (v) general reliability issues as may be reasonably required to accomplish the purpose of the meeting. Transmission Provider, Transmission Owner and Interconnection Customer will also make available personnel and other resources as may be reasonably required to accomplish the purpose of the meeting in the time allocated for the meeting. On the basis of the meeting, Interconnection Customer shall designate its Point of Interconnection, pursuant to Section 6.1, and one or more available alternative Point(s) of Interconnection. The duration of the meeting shall be sufficient to accomplish its purpose.

3.4 OASIS Posting.

Transmission Provider will maintain on its OASIS a list of all Interconnection Requests. The list will identify, for each Interconnection Request: (i) the maximum summer and winter megawatt electrical output; (ii) the location by county and state; (iii) the station or transmission line or lines where the interconnection will be made; (iv) the projected In-Service Date; (v) the status of the Interconnection Request, including Queue Position; (vi) the type of Interconnection Service being requested; and (vii) the availability of any studies related to the Interconnection Request; (viii) the date of the Interconnection Request; (ix) the type of Generating Facility to be constructed (combined cycle, base load or combustion turbine and fuel type); and (x) for Interconnection Requests that have not resulted in a completed interconnection, an explanation as to why it was not completed. The list will not disclose the identity of Interconnection Customer until Interconnection Customer executes a GIA or requests that Transmission Provider file an unexecuted GIA with FERC. Transmission Provider shall post to its OASIS site any deviations from the study timelines set forth herein. Interconnection Study reports and Re-Study reports shall be posted to Transmission Provider's OASIS site subsequent to the meeting between Interconnection Customer and Transmission Provider to discuss the applicable study results. Transmission Provider shall also post any known deviations in the Generating Facility's In-Service Date.

3.5 Coordination with Affected Systems.

Transmission Provider will coordinate the conduct of any studies required to determine the impact of the Interconnection Request on Affected Systems with Affected System Operators and, if possible, include those results (if available) in its applicable Interconnection Study within the time frame specified in this GIP. Transmission Provider will include such Affected System Operators in all meetings held with Interconnection Customer as required by this GIP. Interconnection Customer will cooperate with Transmission Provider in all matters related to the conduct of studies and the determination of modifications to Affected Systems. A Transmission Provider which may be an Affected System shall cooperate with Transmission Provider with whom interconnection has been requested in all matters related to the conduct of studies and the determination of modifications to Affected Systems.

3.6 Withdrawal.

Interconnection Customer may withdraw its Interconnection Request at any time by written notice of such withdrawal to Transmission Provider. In addition, if Interconnection Customer fails to adhere to all requirements of this GIP, except as provided in Section 13.5 (Disputes), Transmission Provider shall deem the Interconnection Request to be withdrawn and shall provide written notice to Interconnection Customer of the deemed withdrawal and an explanation of the reasons for such deemed withdrawal. Upon receipt of such written notice,

Interconnection Customer shall have fifteen (15) Business Days in which to either respond with information or actions that cures the deficiency or to notify Transmission Provider of its intent to pursue Dispute Resolution.

Withdrawal shall result in the loss of Interconnection Customer's Queue Position. If an Interconnection Customer disputes the withdrawal and loss of its Queue Position, then during Dispute Resolution, Interconnection Customer's Interconnection Request is eliminated from the Queue until such time that the outcome of Dispute Resolution would restore its Queue Position. An Interconnection Customer that withdraws or is deemed to have withdrawn its Interconnection Request shall pay to Transmission Provider all costs that Transmission Provider prudently incurs with respect to that Interconnection Request prior to Transmission Provider's receipt of notice described above. Interconnection Customer must pay all monies due to Transmission Provider before it is allowed to obtain any Interconnection Study data or results.

Transmission Provider shall (i) update the OASIS Queue Position posting and (ii) refund to Interconnection Customer any portion of Interconnection Customer's deposit or study payments that exceeds the costs that Transmission Provider has incurred, including interest calculated in accordance with section 35.19a(a)(2) of FERC's regulations. In the event of such withdrawal, Transmission Provider, subject to the confidentiality provisions of Section 13.1, shall provide, at Interconnection Customer's request, all information that Transmission Provider developed for any completed study conducted up to the date of withdrawal of the Interconnection Request.