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March 30, 2012

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

Re: *Southwest Power Pool, Inc.*, Docket No. ER12-____-000
Compliance Filing Revising Tariff in Response to Commission Order in
Docket Nos. ER09-659-002 and EL12-2-000

Dear Secretary Bose:

Pursuant to section 206 of the Federal Power Act (“FPA”), 16 U.S.C. § 824e, Part 35 of the Regulations of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. Part 35, and the Commission’s February 29, 2012 order in Docket Nos. ER09-659-002 and EL12-2-000,¹ Southwest Power Pool, Inc. (“SPP”) submits revisions to its Open Access Transmission Tariff (“Tariff”)² to comply with the February 29 Order. SPP requests an effective date of March 30, 2012 for the revisions proposed in this filing.

I. BACKGROUND

A. SPP

SPP is a Commission-approved Regional Transmission Organization (“RTO”). It is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP currently has 65 Members in 9 states serving more than 6 million households in a 370,000 square-mile area. Its Members include 14 investor-owned utilities, 11 municipal systems, 12 generation and transmission cooperatives, 4 state agencies, 7 independent power producers, 10 power marketers, and 7 independent transmission companies.

¹ *Sw. Power Pool, Inc.*, 138 FERC ¶ 61,150 (2012) (“February 29 Order”).

² Southwest Power Pool, Inc., FERC Electric Tariff, Sixth Revised Volume No. 1.

The Honorable Kimberly D. Bose
 March 30, 2012
 Page 2

As an RTO, SPP administers open access transmission service over 48,930 miles of transmission lines covering portions of Arkansas, Kansas, Louisiana, Missouri, Nebraska, New Mexico, Oklahoma, and Texas, across the facilities of the SPP Transmission Owners.³ SPP's Order No. 890-compliant transmission planning process is set forth in Attachment O of the SPP Tariff.⁴

B. Letter Agreement between SPP and Entergy Services, Inc. (“Entergy”)

On February 6, 2009, SPP filed an executed “Agreement between Southwest Power Pool, Inc. and Entergy Services, Inc. to Implement Principles Governing Regional Planning in Accordance with the Regional Planning Requirements of the Federal Energy Regulatory Commission” (“Letter Agreement”) in Docket No. ER09-659-000.⁵ The Commission accepted the Letter Agreement on April 10, 2009, subject to refund and subject to the outcome of SPP's and Entergy's Order No. 890 compliance proceedings in Docket Nos. OA08-61-001 and OA08-59-004, respectively.⁶

On May 21, 2009, the Commission issued an order addressing SPP's Order 890 compliance filing in Docket No. OA08-61 that, among other things, deferred the Commission's determination of whether the Letter Agreement complied with the Order No. 890 requirements for regional planning until the Commission acted on Entergy's Order No. 890 compliance filing in Docket No. OA08-59.⁷ On June 18, 2009, the

³ See *Sw. Power Pool, Inc.*, 89 FERC ¶ 61,084 (1999); *Sw. Power Pool, Inc.*, 86 FERC ¶ 61,090 (1999); *Sw. Power Pool, Inc.*, 82 FERC ¶ 61,267, *order on reh'g*, 85 FERC ¶ 61,031 (1998).

⁴ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, 2006-2007 FERC Stats. & Regs., Regs. Preambles ¶ 31,241, *order on reh'g*, Order No. 890-A, 2006-2007 FERC Stats. & Regs., Regs. Preambles ¶ 31,261 (2007), *order on reh'g and clarification*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g and clarification*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

⁵ Submission of Letter Agreement Regarding Inter-Regional Planning of Southwest Power Pool, Inc., Docket No. ER09-659-000 (Feb. 6, 2009) (“Letter Agreement Filing”). On February 9, 2009, SPP submitted an amendatory filing to correct certain minor designation and reference errors in the Letter Agreement Filing. See Amendatory Filing of Southwest Power Pool, Inc., Docket No. ER09-659-001 (Feb. 9, 2009).

⁶ *Sw. Power Pool, Inc.*, 127 FERC ¶ 61,032, at PP 1, 16, 18-19 (2009).

⁷ *Sw. Power Pool, Inc.*, 127 FERC ¶ 61,171, at PP 65-66 (2009).

The Honorable Kimberly D. Bose
 March 30, 2012
 Page 3

Commission issued an order regarding Entergy's Order No. 890 compliance filing, directing Entergy to make certain modifications to its transmission planning process in Attachment K of Entergy's Open Access Transmission Tariff ("Entergy OATT") and directing SPP to adopt corresponding revisions to the Letter Agreement.⁸

SPP submitted revisions to the Letter Agreement to comply with the Entergy 2009 Order on August 17, 2009.⁹ In an order issued March 31, 2010, the Commission directed Entergy to revise certain definitions in Attachment K of the Entergy OATT,¹⁰ which Entergy submitted in a filing on June 1, 2010 and the Commission accepted on November 10, 2010.¹¹

C. February 29 Order

In the February 29 Order, the Commission accepted the August 2009 Compliance Filing, subject to SPP submitting an additional filing to revise the definitions in the Letter Agreement to conform with certain revisions accepted by the Entergy November 2010 Order.¹² The February 29 Order also directed SPP to adopt revisions to the Letter Agreement that conform with revisions that the Commission directed SPP to adopt in Attachment O of the SPP Tariff in Docket No. ER08-1419-000 relating to disclosure of resource-specific data in the planning process.¹³

Finally, in the February 29 Order, the Commission instituted a proceeding pursuant to FPA section 206 to determine the justness and reasonableness of certain language in Section VII.8(b) of Attachment O of the SPP Tariff governing access to Critical Energy Infrastructure Information ("CEII") in the SPP transmission planning process.¹⁴ The Commission established a refund effective date and directed SPP to submit revisions to Attachment O by March 30, 2012 to "revis[e] section VII.8(b) of Attachment O to its [Tariff] to remove the language directing individuals that do not belong to a confirmed pre-screened Member or Market Participant to the Commission's

⁸ *Entergy Servs. Inc.*, 127 FERC ¶ 61,272, at P 64 (2009) ("Entergy 2009 Order").

⁹ Compliance Filing of Southwest Power Pool, Inc., Docket No. ER09-659-002 (Aug. 17, 2009).

¹⁰ *Entergy Servs., Inc.*, 130 FERC ¶ 61,264, at PP 1, 9, 30-31 (2010).

¹¹ *Entergy Servs. Inc.*, 133 FERC ¶ 61,130, at PP 1, 10 (2010) ("Entergy November 2010 Order").

¹² February 29 Order at PP 1, 26, 28.

¹³ *Id.* at P 29.

¹⁴ *Id.* at PP 1, 30-35.

The Honorable Kimberly D. Bose
 March 30, 2012
 Page 4

website for instructions to access CEII information and to add procedures for how non-Members may gain access to CEII.”¹⁵

D. SPP Motion for Extension of Time

On March 23, 2012, SPP submitted a motion requesting additional time to comply with the Commission’s requirements to: (1) revise the Letter Agreement to address disclosure of resource-specific data; and (2) modify the CEII provisions of Attachment O to add procedures for non-Members to gain access to CEII materials in the SPP planning process.¹⁶ In the motion, SPP indicated that it would submit the required definition changes to the Letter Agreement and delete language in Attachment O referring non-Members to the Commission for access to CEII by March 30, 2012.¹⁷ The Commission granted SPP’s motion on March 29, 2012.¹⁸

E. Concurrent Filing of Revisions to Letter Agreement

Concurrently with this filing, SPP is submitting in a separate docket revisions to the Letter Agreement to adopt the definitional changes required by the February 29 Order.

II. COMPLIANCE FILING

As discussed above, the Commission directed SPP “*to remove the language directing individuals that do not belong to a confirmed pre-screened Member or Market Participant to the Commission’s website for instructions to access CEII information* and to add procedures for how non-Members may gain access to CEII.”¹⁹ Accordingly, SPP proposes to revise Section VII.8(b) of Attachment O of the SPP Tariff to delete language indicating that “[i]ndividuals that do not belong to a confirmed pre-screened Member or Market Participant shall be directed to the Commission’s website for instructions for access to CEII information.”²⁰

¹⁵ *Id.* at P 34.

¹⁶ Motion for Extension of Time and Request for Shortened Comment Period and Expedited Action of Southwest Power Pool, Inc., Docket Nos. ER09-659-002 and EL12-2-000 (Mar. 23, 2012) (“SPP Motion”).

¹⁷ *Id.* at 4.

¹⁸ *Southwest Power Pool, Inc.*, Notice of Extension of Time, Docket Nos. ER09-659-002 and EL12-2-000 (Mar. 29, 2012) (“March 29 Notice”).

¹⁹ February 29 Order at P 34 (emphasis added).

²⁰ *See* Proposed SPP Tariff at Attachment O § VII.8(b).

The Honorable Kimberly D. Bose
March 30, 2012
Page 5

SPP acknowledges that complying with the Commission-ordered deletion will temporarily leave the SPP Tariff silent on the process by which non-Members and non-Market Participants may gain access to CEII material in the SPP planning process. However, as discussed in the SPP Motion, the development of compliant Tariff revisions governing non-Member access to CEII material requires SPP stakeholder involvement, where the interests of protecting sensitive information can be weighed against the legitimate need for data relevant to informed transmission planning.²¹ The Commission acknowledged the need for stakeholder involvement in granting the SPP Motion.²² Thus, until such time as the new CEII procedures are developed and adopted through the stakeholder process, disclosure of CEII data to non-Members and non-Market Participants will continue to require Commission authorization, consistent with currently effective Attachment O.

III. ADDITIONAL INFORMATION

A. Information Required by the Commission's Regulations

1. Documents submitted with this filing:

In addition to this transmittal letter, SPP is submitting in electronic format clean and redlined versions of the proposed Tariff revisions.

2. Effective date:

SPP requests an effective date of March 30, 2012, the date of this filing, for the proposed revisions.

3. Service:

SPP has served a copy of this filing on all of its Members and Customers and all state regulatory commissions in the SPP region, and has posted a complete copy of this filing on the SPP web site, <http://www.spp.org>. SPP also has served a copy of this filing on the parties on the official service lists established by the Secretary of the Commission for Docket Nos. ER09-659-000 and EL12-2-000.

²¹ SPP Motion at 5-6 (citing Order No. 890 at P 403).

²² March 29 Notice at 1.

The Honorable Kimberly D. Bose
March 30, 2012
Page 6

4. Requisite agreements:

There are none.

5. Estimate of transactions and revenues:

Not applicable.

6. Basis of rates:

The basis for the proposed Tariff revisions is explained above.

7. Comparison to rates for similar services:

Not applicable.

8. Specifically assignable facilities installed or modified:

There are none.

B. Communications

Correspondence and communications with respect to this filing should be sent to, and SPP requests the Secretary to include on the official service list, the following:

Heather H. Starnes, J.D.
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The Honorable Kimberly D. Bose
March 30, 2012
Page 7

IV. CONCLUSION

For the foregoing reasons, SPP requests that the Commission accept this compliance filing effective March 30, 2012.

Respectfully submitted,

/s/ Matthew J. Binette
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**Attorneys for
Southwest Power Pool, Inc.**

cc: Penny Murrell
Michael Donnini
John Rogers
Patrick Clarey
Laura Vallance

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 Docket Nos. ER09-659-000 and EL12-2-000.

Dated at Washington, D.C., this 30th day of March, 2012.

/s/ Matthew J. Binette
Matthew J. Binette

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

VII. Information Exchange

- 1) Data Requirements
 - a) Any entity that is subject to the NERC Reliability Standards is required to provide data to the Transmission Provider in accordance the NERC Reliability Standards for Modeling, Data and Analysis (the “NERC MOD Standards”).
 - b) When an entity has developed a preliminary engineering concept for new facilities that impact the interconnected operation of the Transmission System, it shall contact the Transmission Provider so that the optimal integration of any new facilities and potentially benefiting parties can be identified.
 - c) In preparation for the annual update of transmission planning models for each annual planning cycle, Members, Transmission Customers, Transmission Owners, Generation Interconnection Customers and all other stakeholders must provide to the Transmission Provider the data specified in this Section VII.
 - d) During the course of the annual planning cycle, if material changes to the data occur, the data owners must provide timely written notice to the Transmission Provider.
 - e) The format required to submit modeling data shall be posted on the SPP website.
 - f) The modeling data shall be posted on the SPP website with password protected access.
- 2) Owners of transmission facilities shall provide to the Transmission Provider:
 - a) Modeling data for power flow, short-circuit and stability analysis;
 - b) Detailed power system models of their transmission systems and provide updates to their models via a password protected web based application;
 - c) Data regarding the design and operation of their transmission facilities;
 - d) Their FERC Form 715;
 - e) Their individual company-specific planning criteria;

- f) Planning grade cost estimates and schedules for upgrades in the SPP Transmission Expansion Plan in a timely manner;
 - g) Their five-year transmission construction plans; and
 - h) Their transmission fixed charge rate.
- 3) Generator owners shall provide to the Transmission Provider:
- a) Modeling data for power flow, short-circuit and stability analysis;
 - b) Data for planned additions or upgrades, including status and expected in-service dates, planned retirements and environmental restrictions; and
 - c) Modeling data to perform economic planning studies in accordance with Sections III and IV of this Attachment O. Data required to model generating units for the economic planning studies is documented in the Transmission Network Economic Modeling and Methods manual which shall be posted on the SPP website.
- 4) Transmission Customers
- a) Network Customers shall provide the Transmission Provider an update of the information on its Network Integration Transmission Service application with a ten year forecast of summer and winter load at each delivery point and ten year projection of network resources and with any other information that has changed from the original application.
 - b) Point-to-point Transmission Customers shall provide to the Transmission Provider their good faith projections on their need for service including transmission capacity, duration and points of delivery and receipt over the ten year planning horizon.
 - c) Transmission Customers with existing and planned demand response resources, including demand response resources, shall provide information on such resources.
- 5) Neighboring Transmission Providers and RTOs

In accordance with applicable agreements and Section VIII of this Attachment O, the Transmission Provider shall exchange with neighboring Transmission Providers and RTOs the data required for the development of power flow cases, short-circuit cases and stability cases over the ten year planning horizon.

6) Stakeholder Access to Transmission Planning Information

- a) The planning information, data, and models provided pursuant to this Section VII shall be sufficient to allow parties to replicate results of the planning studies.
- b) The Transmission Provider shall provide a secure web-based workspace for hosting and sharing planning information, data, and models.
- c) The secure web-based workspace shall be password protected and require CEII clearance in accordance with Section VII.8 of this Attachment O.
- d) Instructions to obtain access to the Transmission Provider's power flow models shall be posted on the SPP website.
- e) Instructions to obtain copies of the Transmission Provider's transmission planning maps shall be posted on the SPP website.

7) Confidentiality Requirements

- a) The Transmission Provider shall make all reasonable efforts to preserve the confidentiality of information in accordance with the provisions of the Tariff and the SPP Membership Agreement.
- b) For those entities that have executed a confidentiality agreement, the Transmission Provider shall provide password protected access to confidential information related to the SPP Transmission Expansion Plan and the underlying studies and models via the SPP website.
- c) The form of confidentiality agreement shall be posted on the SPP website.
- d) Resource specific data shall not be made available by the Transmission Provider if the data has been designated confidential by the data provider or if the data can be used to:
 - i) Determine security constrained unit commitment or economic dispatch for resources; or
 - ii) Perform an economic evaluation of costs and benefits.
- e) Other transmission planning information shall be posted on the SPP website and may be password protected, as appropriate.

f) Confidentiality agreements shall be required for Members and Market Participants to receive data where the owner of the data has given permission to the Transmission Provider to release the data.

8) Critical Energy Infrastructure Information (CEII) Requirements

a) The Transmission Provider shall take appropriate steps to protect CEII information.

b) The Transmission Provider shall screen Members and Market Participants prior to providing access to CEII information.

c) For those entities that have met the CEII requirements in Section VII.8.b of this Attachment O, the Transmission Provider shall provide password protected access to CEII information related to the SPP Transmission Expansion Plan and the underlying studies and models via the SPP website.

d) The Transmission Provider shall follow the guidelines set forth by the Commission to flag data which shall be treated as CEII sensitive.

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- a) Network Customers shall provide the Transmission Provider an update of the information on its Network Integration Transmission Service application with a ten year forecast of summer and winter load at each delivery point and ten year projection of network resources and with any other information that has changed from the original application.
 - b) Point-to-point Transmission Customers shall provide to the Transmission Provider their good faith projections on their need for service including transmission capacity, duration and points of delivery and receipt over the ten year planning horizon.
 - c) Transmission Customers with existing and planned demand response resources, including demand response resources, shall provide information on such resources.
- 5) Neighboring Transmission Providers and RTOs

In accordance with applicable agreements and Section VIII of this Attachment O, the Transmission Provider shall exchange with neighboring Transmission Providers and RTOs the data required for the development of power flow cases, short-circuit cases and stability cases over the ten year planning horizon.

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b) The Transmission Provider shall screen Members and Market Participants prior to providing access to CEII information. ~~Individuals that do not belong to a confirmed pre-screened Member or Market Participant shall be directed to the Commission's website for instructions for access to CEII information.~~

c) For those entities that have met the CEII requirements in Section VII.8.b of this Attachment O, the Transmission Provider shall provide password protected access to CEII information related to the SPP Transmission Expansion Plan and the underlying studies and models via the SPP website.

d) The Transmission Provider shall follow the guidelines set forth by the Commission to flag data which shall be treated as CEII sensitive.

FERC rendition of the electronically filed tariff records in Docket No. ER12-01402-000

Filing Data:

CID: C000771

Filing Title: Compliance Filing of Tariff Att. O in Docket Nos. ER12-659 and EL12-2

Company Filing Identifier: 301

Type of Filing Code: 80

Associated Filing Identifier:

Tariff Title: Open Access Transmission Tariff, Sixth Revised Volume No. 1

Tariff ID: 5

Payment Confirmation: N

Suspension Motion:

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

Attachment O Section VII, Attachment O Section VII, 1.0.0, A

Record Narrative Name: Attachment O Section VII

Tariff Record ID: 966

Tariff Record Collation Value: 333656408 Tariff Record Parent Identifier: 409

Proposed Date: 2012-03-30

Priority Order: 500

Record Change Type: CHANGE

Record Content Type: 1

Associated Filing Identifier:

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Document Content(s)

308-3d7e252c-5a4b-4b08-bd76-85ab0741b8a6.DOCX.....1-8

301-ca3fdee4-c0ad-4713-a1a5-2429e9eb67c1.PDF.....9-12

301-a2d10793-22c9-4fb2-b964-74d2b60e0b7e.PDF.....13-16

FERC GENERATED TARIFF FILING.RTF.....17-20