

May 23, 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. ER12-430-____*
(Amended Tariff Filing)**

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act, 16 U.S.C. § 824d, and Part 35 of the Regulations of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. Part 35, Southwest Power Pool, Inc. (“SPP”) hereby amends its November 17, 2011 filing submitted in the above referenced docket.¹ SPP requests that the revisions proposed in the November 17 Filing, as amended herein, become effective on May 24, 2012, the day after the date of this filing.

I. BACKGROUND

In the November 17 Filing, SPP submitted revisions to Attachment AE of its Open Access Transmission Tariff (“Tariff”)² to delete the requirement for SPP to perform and post a daily simultaneous feasibility deliverability analysis study of day-ahead

¹ Southwest Power Pool, Inc., Docket No. ER12-430-000, Amendment to Attachment AE of the Tariff (Nov. 17, 2011) (“November 17 Filing”).

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

The Honorable Kimberly D. Bose
Secretary
May 23, 2012
Page 2

resource plans in the SPP Energy Imbalance Services Market (“EIS Market”). The Commission issued a Combined Notice of Filings in Docket No. ER12-430-000 on November 18, 2011 in which it set the Comment Date of December 8, 2011 for the November 17 Filing. No parties intervened, protested, or filed comments. Subsequent to the Comment Date, Commission Staff contacted SPP with questions regarding the uncontested November 17 Filing.

On January 11, 2012, SPP requested that the Commission defer action on the November 17 Filing to allow SPP to amend the filing to address Commission Staff’s questions.³ On January 12, 2012, the Commission issued a Combined Notice of Filings in Docket No. ER12-430-001 in which it set the Comment Date of February 1, 2012 for the requested deferral. No parties intervened, protested, or filed comments in response to the requested deferral.

As described below, SPP amends the November 17 Filing to address Commission Staff’s questions. Specifically, SPP clarifies that it will continue to perform and post a daily supply adequacy test, will perform a daily N-1 contingency analysis, and will perform a simultaneous feasibility analysis only on an as-needed basis. SPP further explains that with these amendments SPP continues to meet the objective of the *SPP Market Order*⁴ for SPP to conduct studies to ensure that it need not rely on emergency curtailments to manage infeasible situations as a result of infeasible resource plans.

³ Southwest Power Pool, Inc., Docket No. ER12-430-001, Request for Deferral of Commission Action (Jan. 11, 2011).

⁴ *Southwest Power Pool, Inc.*, 114 FERC ¶ 61,289, at P 41 (“*SPP Market Order*”), *order on reh’g*, 116 FERC ¶ 61,289 (2006).

II. CURRENT SIMULTANEOUS FEASIBILITY ANALYSIS STUDY REQUIREMENT

In the *SPP Market Order* accepting in part and rejecting in part SPP's Tariff revisions implementing a real-time EIS Market, the Commission required SPP to "modify its tariff to clarify that it will undertake a simultaneous feasibility deliverability analysis in evaluating the day-ahead resource plans."⁵ The stated reason for such an analysis was "to ensure that SPP will not rely on emergency curtailments to manage infeasible situations on an after-the-fact basis."⁶

In response to the *SPP Market Order*, SPP amended Section 2.4.2 of Attachment AE to expand and clarify the analyses to be performed during the day-ahead process.⁷ First, SPP added a new Section 2.4.2(b) to describe the simultaneous feasibility analysis to be performed during the day-ahead process.⁸ Second, SPP made revisions to the existing supply adequacy analysis provision in Section 2.4.2 to ensure that SPP's protocols and Tariff used similar defined terms and to clarify how third party schedules are included in this assessment.⁹

The Commission accepted SPP's proposed changes to Section 2.4.2 subject to minor modifications: clarification of Sections 2.4.2(a) and 2.4.2(b) that revised resource

⁵ *SPP Market Order* at P 41.

⁶ *Id.*

⁷ Southwest Power Pool, Inc., Docket Nos. ER06-451-002 *et al.*, Compliance Filing at 5 (May 19, 2006).

⁸ *Id.*, Exh. III (Testimony of Mark A. Rossi) at 3.

⁹ *Id.*

plans should be submitted by the later of 1700 CPT on the day prior to the Operating Day or two hours after receipt of notification from SPP.¹⁰ SPP made these minor modifications to Sections 2.4.2, which the Commission accepted.¹¹

III. REMOVAL OF THE DAILY SIMULTANEOUS FEASIBILITY ANALYSIS REQUIREMENT

A. The Simultaneous Feasibility Test Has Proved Not To Be a Useful Tool in Evaluating the Feasibility of Resource Plans in Real-Time the Next Day

As SPP also explained in the November 17 Filing, SPP's past five years of experience in conducting the simultaneous feasibility analysis has demonstrated that this analysis does not serve the function intended by the Commission or otherwise produce useful information. Simply put, this analysis is a poor predictor of what happens in real-time the next day and thus whether resource plans will be feasible. The simultaneous feasibility analysis produces inaccurate results because most of the inputs into the "scheduled feasibility" component of the analysis fluctuate and thus the results rarely accurately forecast what actually happens in real-time the next day. For example, pursuant to SPP scheduling rules, the day-ahead resource plans that provide the inputs into the analysis may be changed up to twenty minutes prior to the operating hour being studied. Therefore, the results of day-ahead simultaneous feasibility analyses do not measure the impact of the actual schedules or reflect a true picture of the likely feasibility or infeasibility of the actual resource plans in real-time the next day.

¹⁰ *Southwest Power Pool, Inc.*, 116 FERC ¶ 61,053, at P 63 ("SPP Compliance Order"), order on reh'g, 117 FERC ¶ 61,110 (2006).

¹¹ See 117 FERC ¶ 61,110, at P 52.

In addition, the unpredictability of both market and non-market impacts inhibits the usefulness of the scheduled feasibility analysis as a tool to evaluate the market in the day-ahead time frame. Both market and non-market impacts can change up to twenty minutes prior to the Operating Day and include changes to neighboring market participant resource plans, third-party transactions, and short lead time transmission and generation outages. Any or all of these components of uncertainty can invalidate the day-ahead schedule feasibility analysis.

As the Commission recognized when SPP's EIS Market was young, "[g]iven time for the resource planning process to work in SPP's market, SPP may be able to demonstrate that some refinement to its imbalance processes is appropriate."¹² This is one of those cases. SPP's experience has demonstrated that conducting daily simultaneous feasibility analyses rarely results in useful information or aids in managing infeasible situations and therefore is not useful. SPP's stakeholders have agreed. SPP conducted a poll of market participants, which revealed that "they do not use the results of this study."¹³ SPP reported the results of this poll to the Market Working Group in June 2011.¹⁴ In addition, as explained in the November 17 Filing, the stakeholders and the SPP Board of Directors approved the removal from the Tariff of the daily simultaneous feasibility analysis requirement.

¹² *Southwest Power Pool, Inc.*, 118 FERC ¶ 61,120, at P 25 (2007).

¹³ *See Minutes of Market Working Group June 21, 22, 2011 Meeting at 2*; available at:<http://www.spp.org/publications/MWG%206%2021%2022%2011%20Minutes%20&%20Attachments.pdf>.

¹⁴ *Id.*

B. SPP's Amended Proposal

As described below, SPP proposes in this amended filing to revise Section 2.4.2 of Attachment AE to remove the requirement for SPP to conduct a daily simultaneous feasibility analysis, but leave intact the requirement to conduct a daily supply adequacy test.¹⁵ SPP further proposes to amend Section 2.4.2 to specify that, prior to each Operating Day, SPP will perform a supply deliverability analysis and only will perform a simultaneous feasibility analysis on an as-needed basis.¹⁶

The supply adequacy analysis is the same analysis that SPP currently performs, which is described in Section 2.4.2(a).¹⁷ The supply adequacy analysis is necessary to ensure that there is sufficient operating capacity scheduled so that SPP may operate the system reliably to meet the load forecast; it determines whether each market participant's energy obligation is less than or greater than the aggregate dispatchable limits submitted in the market participant's resource plan. In the event of an Energy Obligation

¹⁵ SPP also proposed the removal of the daily simultaneous feasibility analysis requirement in the November 17 Filing.

¹⁶ SPP is retaining the functionality to perform the simultaneous feasibility analysis so that if in the future the inputs become more reliable or the analyses is otherwise deemed necessary, SPP would be able to perform it.

¹⁷ SPP is not proposing any changes to Section 2.4.2(a).

Deficiency¹⁸ or Energy Obligation Excess¹⁹ in any hour of the next Operating Day, SPP notifies the market participant of such deficiency or excess, and the market participant is required to resubmit a revised resource plan.

The supply deliverability analysis specified in revised Section 2.4.2(b) is the same N-1 contingency analysis that SPP currently performs in its role as Reliability Coordinator and will function as the “deliverability” component of the simultaneous feasibility deliverability analysis contemplated by the *SPP Market Order*.²⁰ As described in SPP Criteria § 5.2.4.1 and now in proposed revised Section 2.4.2(b) of Attachment AE, SPP performs a day-ahead contingency analysis to assess the impact of any single transmission contingency 100 kV and above while monitoring all facilities 100 kV and above within the entire SPP footprint and neighboring Balancing Authority Areas or Transmission Operator systems.²¹ In the event system reliability is threatened, SPP notifies and coordinates with the affected Transmission Operators, Balancing Authorities,

¹⁸ “Energy Obligation Deficiency” is defined as: “A condition created, either at the Market Participant level or Balancing Authority level, when the sum of applicable Resource Maximum Economic Limits in an hour is less than the applicable load forecast as adjusted for third party schedules in that hour.” Tariff, Attachment AE, Section 1.1 Definitions E.

¹⁹ Energy Obligation Excess is defined as: “A condition created, either at the Market Participant level or Balancing Authority level, when the sum of applicable Resource Minimum Economic Limits in an hour is greater than the applicable load forecast as adjusted for third party schedules in that hour.” Tariff, Attachment AE, Section 1.1 Definitions E.

²⁰ See SPP Criteria § 5.2.4.1 (updated Jan. 30, 2012).

²¹ *Id.* § 5.2.4.1(c).

or Transmission Service Providers to determine appropriate control action to address the deliverability issue.²²

Removing the mandatory requirement to perform the daily simultaneous feasibility analysis and instead allowing SPP to perform it on an as-needed basis, while maintaining the mandatory requirement to perform a supply adequacy analysis, and specifying the mandatory requirement to perform a supply deliverability analysis, refines the EIS Market process and benefits market participants by retaining useful studies and eliminating a time-consuming, SPP labor-intensive study process²³ that does not provide market participants or SPP with accurate or useful information and which does not fulfill the purpose for which it was initiated.

C. There Are Other Tools to Manage Deliverability and Feasibility in the SPP Region

In addition, there are other tools that help to manage deliverability and feasibility in the SPP Region. As explained in the November 17 Filing, deliverability is further ensured because each of the sixteen individual Balancing Authorities within the SPP footprint must meet mandatory NERC standards that require each Balancing Authority to plan in such a way that ensures deliverability.²⁴ Their responsibility is to make sure that

²² *Id.* § 5.2.4.1(e).

²³ Performing the daily simultaneous feasibility analysis is time consuming for SPP operations shift engineers as it can take up to four hours to complete and must be monitored by an experienced engineer continually throughout the study process.

²⁴ *See* November 17 Filing at 4; *see also*, North American Electric Reliability Corporation (NERC) Standard TOP-002-2b — Normal Operations Planning: **R5**. (Each Balancing Authority and Transmission Operator shall plan to meet scheduled system configuration, generation dispatch, interchange scheduling and (Cont'd . . .)

generation is dispersed and reliable, which guards against the occurrence of infeasible situations.

Furthermore, SPP, as Tariff administrator, ensures that transmission service is not oversold in the footprint through the Real Time Response Factor Calculator process. The Real Time Response Factor Calculator provides calculations used in evaluating the sale of transmission service from next hour through the next sixteen months. It builds models that use assumptions such as expected outages, interchange, and dispatch to project flows on the system for these future intervals. This data results in the expected available capacity on the system.

In addition, SPP notes that firm curtailments generally occur primarily as a result of temporary operating conditions (either from planned or emergency transmission outages, both internal and external to the SPP footprint) and parallel flow from surrounding markets (*e.g.*, Midwest Independent Transmission System Operator, Inc.).

IV. AMENDMENTS TO ATTACHMENT AE

To remove the mandatory requirement to perform the daily simultaneous feasibility analysis and instead allow SPP to perform it on an as-needed basis, and to add a mandatory requirement to perform a supply deliverability analysis, SPP proposes to amend Section 2.4.2 of Attachment AE as follows. The introductory paragraph is revised: (i) to reflect the mandatory requirement to perform supply adequacy and supply

(. . . cont'd)

demand patterns); **R7.** (Each Balancing Authority shall plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency).

deliverability analyses, and (ii) to reflect that the daily simultaneous feasibility deliverability analysis may be performed “if required.” Section 2.4.2(a) further contains minor grammatical revisions, adding commas in two places and deleting an extraneous space at the end of one sentence.

Section 2.4.2(b) now sets forth the requirements for the supply deliverability analysis rather than those for the daily simultaneous feasibility analysis.

A new Section 2.4.2(c) is added, which now contains the existing requirements for the daily simultaneous feasibility analyses that have been moved from the current 2.4.2(b). New Section 2.4.2(c) and existing Section 2.4.2(b) are identical, except for the section designation.²⁵

These Tariff revisions are just and reasonable because they facilitate the removal of the requirement to conduct daily simultaneous feasibility analyses, which have proven to produce inaccurate and unusable results and do not fulfill their original intended purpose.

V. EFFECTIVE DATE AND WAIVER

SPP requests an effective date of May 24, 2012, for the November 17 Filing, as amended herein, the day after the date of this filing. To permit such an effective date, pursuant to 18 C.F.R. § 35.11, SPP requests waiver of the Commission’s 60-day notice requirement. Good cause exists for waiver, because no party intervened or protested the November 17 Filing, and this amendment makes no material substantive change to that

²⁵ In the November 17 Filing, SPP proposed to remove Section 2.4.2(b)(iii) from Attachment AE of the Tariff. In this filing, SPP is not removing that section but rather moving it to Section 2.4.2(c)(iii).

filing. The purpose of the November 17 Filing is to remove the mandatory requirement that SPP perform daily simultaneous feasibility analyses, which this amendment does not change, but rather merely provides additional clarification and support for the change. Furthermore, as explained above, due to the inaccurate nature of the results of the simultaneous feasibility analyses, the analyses lack usefulness and do not fulfill the purpose for which they were mandated in the *SPP Market Order*; therefore, it is reasonable to permit SPP to cease conducting these time-consuming analyses as soon as possible.

VI. 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 that the Commission accept the proposed revisions to the Tariff proposed in the November 17 Filing, as amended herein, effective May 24, 2012, the day after the date of this filing.

3. Service:

SPP has served a copy of this filing on all its members and customers and affected state commissions. A complete copy of this filing will be posted on the SPP web site, www.spp.org.

4. Requisite agreements:

The SPP Board of Directors approved the proposed Tariff revisions filed in the November 17 Filing on July 26, 2011. The proposed revisions require no further agreements.

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:

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The Honorable Kimberly D. Bose
Secretary
May 23, 2012
Page 13

VII. CONCLUSION

For the foregoing reasons, SPP requests that the Commission accept the amendments to Attachment AE of the Tariff filed in this docket as just and reasonable, with an effective date of May 24, 2012.

Respectfully submitted,



Wendy N. Reed
Carrie L. Bumgarner

**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 23rd day of May, 2012.

A handwritten signature in cursive script, reading "Carrie L. Bumgarner". The signature is written in black ink and features a long, sweeping horizontal stroke at the end.

Carrie L. Bumgarner

2.4.2 Review and Assessment of Resource Plans

Prior to each Operating Day, the Transmission Provider shall assess the supply adequacy and deliverability of operating capacity scheduled in each Market Participant's Resource Plan. The Transmission Provider shall perform this assessment using the Supply Adequacy Analysis and Supply Deliverability Analysis described in (a) and (b) below respectively. If required, the Transmission Provider also may perform the Simultaneous Feasibility Test described in Section (c) below.

(a) **Supply Adequacy Analysis**

The inputs to the supply adequacy analyses shall be the load forecasts developed pursuant to Section 2.1 and submitted under Section 2.2, the Resource Plans submitted pursuant to Section 2.2, the energy obligations calculated under Section 2.2, and Ancillary Service Plans submitted pursuant to Section 2.3. The objective of performing the supply adequacy analysis is to ensure there is sufficient operating capacity scheduled so that the Transmission Provider may operate the system reliably to meet the load forecast. For each hour, the Transmission Provider shall determine if each Market Participant's energy obligation as set forth in Section 2.2 is: (i) less than the aggregate of the Dispatchable Maximum Limits; and (ii) greater than the aggregate of the Dispatchable Minimum Limits submitted in its Resource Plan. Similarly, for each Balancing Authority Area, the Transmission Provider shall determine if the Balancing Authority's energy obligation set forth in Section 2.2 is: (i) less than the aggregate of the Dispatchable Maximum Limits; and (ii) greater than the aggregate of the Dispatchable Minimum Limits submitted in all Market Participant Resource Plans in that area. If the Transmission Provider determines there is an Energy Obligation Deficiency or Energy Obligation Excess in any hour of the next Operating Day within a Balancing Authority Area, the Transmission Provider shall immediately notify those Market Participants within that Balancing Authority Area that have an Energy Obligation Deficiency or Energy Obligation Excess, as applicable, in that hour. Such Market Participant shall correct the deficiency or excess and resubmit revised plans and/or schedules to the

Transmission Provider by the later of 1700 on the day prior to the Operating Day or two hours following notification by the Transmission Provider.

(b) Supply Deliverability Analysis

The supply deliverability analysis shall be a day-ahead contingency analysis to assess the impact of any single transmission contingency 100 kV and above while monitoring all facilities 100 kV and above within the entire SPP Reliability Coordinator footprint and neighboring Balancing Authority Areas or Transmission Operator systems. During conditions where systems reliability is threatened, SPP shall notify and coordinate with the affected the Transmission Operators, Balancing Authorities, or Transmission Service Providers in determining appropriate control action.

(c) Simultaneous Feasibility Analysis

- (i) The inputs to the simultaneous feasibility analyses shall be the load forecasts developed pursuant to Section 2.1, the Resource Plans submitted pursuant to Section 2.2, including any applicable Energy Schedules, Offer Curves submitted pursuant to Section 2.5 and Ancillary Service Plans submitted pursuant to Section 2.3. The simultaneous feasibility analysis determines the impacts of single transmission facility contingencies on a set of monitored transmission facilities.
- (ii) To verify that the submitted Resource Plans and applicable Energy Schedules can be implemented reliably, the Transmission Provider shall determine if all constraints identified in the simultaneous feasibility analysis can be resolved through; (i) the simulated dispatch of Dispatchable Resources only; and (ii) simulation of potential impacts that a TLR may have on the constraint as described in the Market Protocols. If such constraints can be resolved, the Transmission Provider shall post a notification on its website identifying the projected constraint and that TLR may be necessary to resolve the issues in Real-Time.
- (iii) If the Transmission Provider determines through the simultaneous feasibility analysis that the submitted Resource Plans cannot be implemented reliably, the Transmission Provider shall immediately notify

the affected Market Participants that their plans are infeasible. The Transmission Provider shall determine each affected Market Participant's responsibility for resolving the infeasibility in accordance with the Market Protocols. Such Market Participants shall revise and resubmit their plans to the Transmission Provider by the later of 1700 on the day prior to the Operating Day or two hours following notification by the Transmission Provider.

2.4.2 Review and Assessment of Resource Plans

~~Prior to each Operating Day, the Transmission Provider shall assess the supply adequacy and deliverability of operating capacity scheduled in each Market Participant's Resource Plan. Between 1300 and 1500 Central Prevailing Time on the day prior to the Operating Day, the Transmission Provider shall perform a review of the operating capacity scheduled in each Market Participant's Resource Plan. The Transmission Provider shall perform this assessment using the Supply Adequacy Analysis and Supply Deliverability Analysis described in (a) and (b) below respectively. This review shall include an assessment of the total operating capacity scheduled in each hour of the next Operating Day and If required, the Transmission Provider also may perform the Simultaneous Feasibility Test described in Section (c) below. a simultaneous feasibility study to ensure that such operating capacity is deliverable in each hour of the next Operating Day.~~

(a) Supply Adequacy Analysis

The inputs to the supply adequacy analyses shall be the load forecasts developed pursuant to Section 2.1 and submitted under Section 2.2, the Resource Plans submitted pursuant to Section 2.2, the energy obligations calculated under Section 2.2, and Ancillary Service Plans submitted pursuant to Section 2.3. The objective of performing the supply adequacy analysis is to ensure there is sufficient operating capacity scheduled so that the Transmission Provider may operate the system reliably to meet the load forecast. For each hour, the Transmission Provider shall determine if each Market Participant's energy obligation as set forth in Section 2.2 is: (i) less than the aggregate of the Dispatchable Maximum Limits; and (ii) greater than the aggregate of the Dispatchable Minimum Limits submitted in its Resource Plan. Similarly, for each Balancing Authority Area, the Transmission Provider shall determine if the Balancing Authority's energy obligation set forth in Section 2.2 is: (i) less than the aggregate of the Dispatchable Maximum Limits; and (ii) greater than the aggregate of the Dispatchable Minimum Limits submitted in all Market Participant Resource Plans in that area. If the Transmission Provider determines there is an Energy Obligation Deficiency or Energy Obligation Excess in any hour of the next Operating Day within a Balancing Authority Area, the Transmission Provider

shall immediately notify those Market Participants within that Balancing Authority Area that have an Energy Obligation Deficiency or Energy Obligation Excess, as applicable, in that hour. Such Market Participant shall correct the deficiency or excess and resubmit revised plans and/or schedules to the Transmission Provider by the later of 1700 on the day prior to the Operating Day or two hours following notification by the Transmission Provider.

(b) Supply Deliverability Analysis

The supply deliverability analysis shall be a day-ahead contingency analysis to assess the impact of any single transmission contingency 100 kV and above while monitoring all facilities 100 kV and above within the entire SPP Reliability Coordinator footprint and neighboring Balancing Authority Areas or Transmission Operator systems. During conditions where systems reliability is threatened, SPP shall notify and coordinate with the affected the Transmission Operators, Balancing Authorities, or Transmission Service Providers in determining appropriate control action.

(c) Simultaneous Feasibility Analysis

- (i) The inputs to the simultaneous feasibility analyses shall be the load forecasts developed pursuant to Section 2.1, the Resource Plans submitted pursuant to Section 2.2, including any applicable Energy Schedules, Offer Curves submitted pursuant to Section 2.5 and Ancillary Service Plans submitted pursuant to Section 2.3. The simultaneous feasibility analysis determines the impacts of single transmission facility contingencies on a set of monitored transmission facilities.
- (ii) To verify that the submitted Resource Plans and applicable Energy Schedules can be implemented reliably, the Transmission Provider shall determine if all constraints identified in the simultaneous feasibility analysis can be resolved through; (i) the simulated dispatch of Dispatchable Resources only; and (ii) simulation of potential impacts that a TLR may have on the constraint as described in the Market Protocols. If such constraints can be resolved, the Transmission Provider shall post a

notification on its website identifying the projected constraint and that TLR may be necessary to resolve the issues in Real-Time.

- (iii) If the Transmission Provider determines through the simultaneous feasibility analysis that the submitted Resource Plans cannot be implemented reliably, the Transmission Provider shall immediately notify the affected Market Participants that their plans are infeasible. –The Transmission Provider shall determine each affected Market Participant’s responsibility for resolving the infeasibility in accordance with the Market Protocols. Such Market Participants shall revise and resubmit their plans to the Transmission Provider by the later of 1700 on the day prior to the Operating Day or two hours following notification by the Transmission Provider.