

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Open Access and Priority Rights on Interconnection Facilities))	Docket No. AD12-14-000
Priority Rights to New Participant- Funded Transmission))	Docket No. AD11-11-000

COMMENTS OF SOUTHWEST POWER POOL, INC.

In response to the Federal Energy Regulatory Commission’s (“Commission”) Notice of Inquiry issued April 19, 2012, Southwest Power Pool, Inc. (“SPP”) respectfully submits these comments in the above-captioned proceeding.

As a Planning Authority, SPP supports Commission policy that would allow open access to generator lead lines and allow the Planning Authority to be able to incorporate such facilities in its transmission planning processes. Through the SPP Generator Interconnection Process in Attachment V of the SPP Open Access Transmission Tariff (“SPP Tariff”), SPP receives several dozen requests for generator interconnections each year, primarily for wind energy development projects in transmission constrained areas. Wind developers have built generator leads in the SPP transmission footprint and these generator leads are sometimes over 20 miles long and have been at voltages of 138 kV, 230 kV, and 345 kV. To date, these generator lead lines have been seen as “out of reach” with regards to future planning of the grid, both for purposes of accommodating future generator interconnections as well as planning for the needs of the transmission system.

As SPP and its members continue planning, routing, and constructing new transmission lines through the Integrated Transmission Process (“ITP”) detailed in Attachment O of the SPP Tariff, it is evident that there are other builders of transmission facilities throughout the SPP

footprint. Since these facilities are not under SPP's purview as a Transmission Provider, the exact details of such transmission facilities are not known. However, there are several instances of generator developers building lines operating at a transmission voltage throughout the SPP footprint. One of the most notable instances is a 30 mile, 230 kV generator lead in north central Kansas for a 200 MW wind generating facility, but there are instances of proposed 345 kV facilities that are even longer.

SPP has also observed that many generator developers prefer to build their own generator lead to interconnect to the transmission system at a location of their own choosing. In areas of high concentration of wind generation potential, this usually results in a situation in the interconnection queue where several wind generators propose multiple generator lead lines to interconnect to the same transmission line within very close proximity to each other. If these requested generator leads continue to be built, the result will be multiple tapped transmission lines with unnecessary substations and substation equipment with potential multiple failure points which causes the operation of the grid to be inefficient and more complicated.

For these reasons, SPP and its stakeholders formed two task forces to address such issues. The first, the Land Use Policy Task Force ("LUPTF"), was formed to address the issue of inefficiency of rights-of-way in building transmission facilities. The second, the Area Generation Connection Task Force ("AGCTF"), was formed to establish optimal procedures in connecting generation (and its associated generator lead facilities) to the transmission system for the purpose of minimizing substations built for the interconnection of a single generator.

The LUPTF presented its policy recommendations to the SPP Market and Operations Committee ("MOPC") in October 2010.¹ Among the LUPTF's recommendations were to 1)

¹ The LUPTF presentation to MOPC can be found in the October 2010 minutes posted at: <http://www.spp.org/section.asp?group=321&pageID=27>.

combine possible transmission facilities to reduce the number of parallel paths and minimize rights of way; 2) to identify opportunities to connect generator leads together prior to connecting to the transmission system through the generator interconnection process, and 3) identify instances where generator leads might share a common location with transmission facilities in SPP's 10-year and 20-year transmission plans.

The AGCTF presented its policy recommendations to the MOPC in April 2012.² The AGCTF policy recommendations included instituting a policy of “Hubs” and “Spokes” in the SPP transmission system to efficiently accommodate the growing number of renewable energy generator interconnection requests in the SPP generator interconnection queue.

Under the proposed AGCTF policy, Hubs are substations on the transmission backbone established for the purpose of interconnecting multiple generators. Hubs would be primarily located in areas remote from load that are along relatively long transmission lines. Hubs are seen as an efficient method to interconnect multiple generators in these areas without having to build multiple, redundant substations to interconnect each individual generator. Spokes are transmission lines/generator leads that would be built to interconnect more than one generator to allow easier access to Hub substations. While SPP has not finalized tariff language for the proposed ACGTF's Hubs and Spokes policy, it has been proposed that Spokes may be built by the Transmission Owner at the Interconnection Customer's expense to facilitate interconnection to the transmission system and Hub. Another possibility, or variation of spokes, would involve an Interconnection Customer building the spoke and then having the ownership revert to the Transmission Owner to accommodate further interconnections.

² The ACGTF presentation to MOPC can be found in the April 2012 minutes posted at: <http://www.spp.org/section.asp?group=321&pageID=27>.

The proposed AGCTF's Spokes policy was driven partially by the fact that Interconnection Customer's Interconnection Facilities are not included in Article 9.9.2 of the SPP Generator Interconnection Agreement ("GIA") and primarily by the response from SPP stakeholders that interconnection customers, acting as competitors, may not fully cooperate with each other when it is time to obtain rights-of-way and perform the construction necessary for generator leads and substation construction. This view from stakeholders was seen as an obstacle in implementing changes to the language Article 9.9.2 of the GIA.

By including Interconnection Customer's Interconnection Facilities (which includes generator leads) in the scope of the existing Article 9.9.2 of the GIA, SPP, as the Planning Authority, would have increased ability to plan the transmission system in a holistic, top-down manner. By placing these generator leads under the Planning Authority's purview, SPP would be able to encourage the policies of the LUPTF in reducing parallel paths and minimizing rights-of-way by encouraging generators to share generator leads with other Interconnection Customers. This would also more closely resemble the method in which generation is developed in the SPP region. Very seldom are two generator Interconnection Customers ready to proceed at the same time. Encouraging one generator to build a transmission line and allowing future generators to interconnect onto that line would create a more efficient utilization of the transmission system by eliminating duplicate generator leads and interconnection substations.

Respectfully submitted,



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