

FERC or State Jurisdiction: FERC

AD14-8 Winter 2013-2014 Operations and Market Performance in Regional Transmission Organizations ("RTOs") and Independent System Operators ("ISOs")

On October 16, 2014, Commission Staff presented its report on Commission and Industry Actions Relevant to Winter 2013-14 Weather Events.

AD14-14 Price Formation in Energy and Ancillary Services Markets Operated by Regional Transmission Organizations ("RTOs") and Independent System Operators ("ISOs")

On October 10, 2014, FERC issued a Notice of Workshop to be held on December 9, 2014 to address technical, operational, and market issues related to operator actions in energy and ancillary services markets operated by RTOs and ISOs.

On October 10, 2014, FERC issued a Supplemental Notice of Workshop to be held on October 28, 2014. The agenda and list of participants were included.

On October 21, 2014, FERC issued a Notice of Issuance of Reports on Shortage Pricing and Energy Offer Mitigation in RTO and ISO Markets.

On October 28, 2014, a workshop was held to address technical, operational, and market issues related to offer price mitigation and offer price caps, and scarcity and shortage pricing in energy and ancillary services markets operated by RTOs and ISOs.

On October 29, 2014, the Electric Power Supply Association filed a report titled "Price Formation in ISOs and RTOs Principles and Improvements".

EL11-34 Midwest Independent Transmission Operator, Inc. ("MISO") Petition for Declaratory Order Seeking Commission Confirmation Regarding Section 5.2 of the Joint Operating Agreement ("JOA") between MISO and SPP

On October 21, 2014, Judge Cintron filed a Settlement Judge Report, recommending that settlement procedures continue. The next settlement conference is scheduled for October 23, 2014.

A settlement conference was held on October 23, 2014.

On October 27, 2014, Judge Cintron issued an Order Scheduling Settlement Conference to be held on November 20, 2014.

EL12-59 Complaint of Golden Spread Electric Cooperative, Inc. ("Golden Spread") Against Southwestern Public Service Company ("SPS") Regarding Rate of Return on Common Equity ("ROE") Input Value for the Formula Rate Applicable to the Replacement Power Sales Agreement ("RPSA")

On October 20, 2014, Complainants filed a Complaint Requesting Fast Track Processing and Motion to Consolidate this proceeding with Docket Nos. EL13-78 and EL12-59.

This Complaint involves the input value for rate of return on common equity in the formula rate applicable to the Replacement Power Sales Agreements pursuant to which SPS sells capacity and energy to Golden Spread and the New Mexico Cooperatives, and the formula rate applicable to determination of the SPS Annual Transmission Revenue Requirement within the Xcel Energy, Inc. and SPP Open Access Transmission Tariffs.

Regulatory Status Report

EL14-21 **SPP Complaint for an Order Finding the Midcontinent Independent System Operator, Inc. ("MISO") is Violating the Joint Operating Agreement ("JOA") between SPP and MISO and the SPP Tariff and Requiring MISO to Compensate SPP for Use of SPP's Transmission System**

On October 21, 2014, Judge Cintron filed a Settlement Judge Report, recommending that settlement procedures continue. The next settlement conference is scheduled for October 23, 2014.

On October 27, 2014, Judge Cintron issued an Order Scheduling Settlement Conference to be held on November 20, 2014.

EL14-30 **Midcontinent Independent System Operator, Inc. ("MISO") Complaint Regarding Transmission Service Invoices from SPP**

On October 21, 2014, Judge Cintron filed a Settlement Judge Report, recommending that settlement procedures continue. The next settlement conference is scheduled for October 23, 2014.

On October 27, 2014, Judge Cintron issued an Order Scheduling Settlement Conference to be held on November 20, 2014.

EL14-73 **Section 206 Proceeding Directing The Empire District Electric Company ("Empire") to File Revisions to its Formula Rate Protocols**

On October 27, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments.

The MoPSC stated that the Commission should not take a "one size fits all" approach to evaluation of the SPP Transmission Owner's Tariffs. The MoPSC also stated that it objects to Empire's changes that go beyond what is necessary for compliance with the Commission's July 17, 2014 Order issued in EL14-73. The MoPSC suggested several proposed changes to the protocols.

EL14-74 **Section 206 Proceeding Directing Kansas City Power & Light Company ("KCP&L") to File Revisions to its Formula Rate Protocols**

On October 27, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments.

The MoPSC stated that the Commission should not take a "one size fits all" approach to evaluation of the SPP Transmission Owner's Tariffs. The MoPSC suggested several proposed changes to the protocols.

EL14-75 **Section 206 Proceeding Directing KCP&L Greater Missouri Operations Company ("KCP&L-GMO") to File Revisions to its Formula Rate Protocols**

On October 27, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments.

The MoPSC stated that the Commission should not take a "one size fits all" approach to evaluation of the SPP Transmission Owner's Tariffs. The MoPSC suggested several proposed changes to the protocols.

Regulatory Status Report

EL14-77

Section 206 Proceeding Directing Westar Energy, Inc. ("Westar") to File Revisions to its Formula Rate Protocols

On October 2, 2014, Kansas Electric Power Cooperative, Inc. filed a Protest. KEPCO requested that the Commission (i) reject the Westar Compliance Filing to the extent that it seeks to make changes to the protocols that diminish the rights of affected parties, including those changes noted in the body of this pleading, as such filing both violates the FERC Show Cause Order and Federal Power Act Section 205; (ii) cure the unduly discriminatory and preferential treatment of affected parties (in the current and filed protocols) by providing that affected parties and Westar must be afforded equal time to detect errors and have them corrected; and (iii) make such other changes as may be warranted by the facts and circumstances noted herein.

On October 21, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments. The MoPSC requested that the Commission require Westar to make changes proposed in these Comments.

On October 30, 2014, Westar Energy, Inc. filed an answer in response to the protest filed by Kansas Electric Power Cooperative, Inc. filed on October 2, 2014.

EL14-81

Golden Spread Electric Cooperative, Inc. ("Golden Spread") and Sharyland Utilities, L.P. ("Sharyland") Petition for Declaratory Order Concerning Jurisdiction Over Transmission Interconnection Facilities that Would Deliver Power from the Antelope Elk Energy Center Located in the Electric Reliability Council of Texas ("ERCOT")

On October 3, 2014, FERC issued an Order Granting Petition for Declaratory Order.

The Commission ordered:

Petitioners' petition for a declaratory order disclaiming jurisdiction over the transmission and interconnection facilities between the Antelope Elk Energy Center and the ERCOT grid, as well as the transmission and sales of electric energy over those facilities, was granted, as discussed in the body the order. The utilities in ERCOT that are not currently public utilities under the FPA will not become public utilities as a result of the interconnection of the Antelope Elk Energy Center with the ERCOT grid, as discussed in the body of the order. Golden Spread may operate the Antelope Elk Energy Center as a switchable generation resource between SPP and ERCOT without jeopardizing the jurisdictional status quo, as discussed in the body of the order.

EL15-8

Golden Spread Electric Cooperative, Inc. ("Golden Spread"), Central Valley Electric Cooperative, Inc. ("Central Valley"), Farmers' Electric Cooperative, Inc. ("Farmers"), Lea County Electric Cooperative, Inc. ("Lea County"), Roosevelt County Electric Cooperative, Inc. ("Roosevelt") and the West Texas Municipal Power Agency ("WTMPA") (collectively the "Complainants") Complaint Against Southwestern Public Service Company ("SPS") Involving the Input Value for Rate of Return on Common Equity ("ROE") in the Formula Rate Applicable to the Replacement Power Sales Agreements Pursuant to which SPS Sells Capacity and Energy to the Complainants and the Formula Rate Applicable to Determination of the SPS Annual Transmission Revenue Requirement ("ATRR")

On October 20, 2014, Complainants filed a Complaint Requesting Fast Track Processing and Motion to Consolidate this proceeding with Docket Nos. EL13-78 and EL12-59.

This Complaint involves the input value for rate of return on common equity in the formula rate

Regulatory Status Report

applicable to the Replacement Power Sales Agreements pursuant to which SPS sells capacity and energy to Golden Spread and the New Mexico Cooperatives, and the formula rate applicable to determination of the SPS Annual Transmission Revenue Requirement within the Xcel Energy, Inc. and SPP Open Access Transmission Tariffs.

On October 21, 2014, FERC issued a Notice of Complaint.

On October 22, 2014, Southwestern Public Service Company filed a Motion for Extension of Time to file its response to the Complaint.

On October 22, 2014, FERC issued an Errata Notice Extending Comment Date to November 12, 2014.

ER12-959

SPP Submission of Revisions to OATT to Implement a Formula Rate for Transmission Service for Tri-County Electric Cooperative, Inc. ("Tri-County"), a Transmission Owner in the Southwestern Public Service Company ("SPS") Zone

On October 16, 2014, FERC issued an Order Denying Rehearing and Accepting Compliance Filing, Subject to a Further Compliance Filing.

FERC denied requests for rehearing of the February 21, 2013 Order.

FERC accepted SPP's March 19, 2013 Compliance Filing, instituting Tri-County's voluntary commitment to pay refunds of the difference between the proposed rate and the rate ultimately determined by the Commission to be just and reasonable in the hearing in this proceeding, subject to a further compliance filing.

The Commission stated that in view of its determination in the order being issued concurrently that none of Tri-County's facilities is eligible for rolled-in-rate recovery from SPP's Zone 11 transmission customers, the Commission requires SPP to 1) cease collecting Tri-County's ATRR, effective the date of this order; 2) pass through refunds received from Tri-County's refund commitment, with interest, back to February 22, 2013, and submit a refund report within 45 days thereafter; and 3) submit a further compliance filing to remove from the Tariff the tariff sheets under which SPP has been collecting Tri-County's ATRR.

SPP's compliance filing is due no later than November 17, 2014.

On October 16, 2014, FERC issued Opinion No. 535, Opinion and Order on Initial Decision.

The Commission affirmed the Initial Decision with respect to the Presiding Judge's findings that Tri-County's facilities are not "Transmission Facilities" under Attachment A1 of SPP's Tariff or transmission facilities under the Commission's seven factor test, and that none of Tri-County's facilities therefore are eligible to be rolled into SPP's Zone 11 ATRR.

On October 30, 2014, SPP submitted its compliance filing in response to the October 16, 2014 Order, which required SPP to 1) cease collecting Tri-County's Annual Transmission Revenue Requirement ("ATRR"), effective October 16, 2014; 2) pass through refunds received from Tri-County's refund commitment, with interest, back to February 22, 2013, and submit a refund report within 45 days thereafter; and 3) submit a further compliance filing to remove from the Tariff the tariff sheets under which SPP has been collecting Tri-County's ATRR.

An effective date of October 16, 2014 was requested.

Regulatory Status Report

ER12-1179

Submission of Tariff Revisions to Implement SPP Integrated Marketplace

On October 29, 2014, SPP filed a Motion for Extension of Time. In light of the D.C. Circuit's vacatur of Order No. 745 in *ESPA v FERC*, SPP requests an extension of time until 120 days after the Commission acts on remand to submit the compliance filings required by the April 1, 2014 Order.

ER13-366

Submission of Tariff Revisions to Comply with Order No. 1000 Regional Planning and Cost Allocation Requirements

On October 16, 2014, FERC issued an Order on Rehearing and Compliance.

The Commission granted in part and denied in part the requests for rehearing.

The Commission affirmed the finding in the First Compliance Order that, because Byway facilities are selected as part of SPP's regional transmission planning process and a portion of the cost of Byway facilities is allocated regionally, SPP must eliminate the federal right of first refusal for Byway facilities to comply with Order No. 1000.

On rehearing, SPP and Oklahoma Gas and Electric Company disagreed with the Commission's finding that SPP must remove Tariff provisions that require SPP to consider state law and rights-of-way at two early stages of the competitive solicitation process. On reconsideration, the Commission agreed and granted the requests for rehearing with respect to these provisions. SPP is to restore the provisions as proposed in its First Compliance Filing.

The Commission granted rehearing and found that exclusion of Service Upgrades from the proposed definition of Competitive Upgrades is consistent with Order No. 1000. The Commission agreed that Service Upgrades should not be included in the definition of Competitive Upgrades. The Commission found that SPP's Aggregate Study process is not an Order No. 1000 regional transmission planning process. The Commission found that Service Upgrades are not selected in the regional transmission plan for purposes of cost allocation and are not identified in a regional transmission planning process as the more efficient or cost-effective solution to regional transmission needs. SPP was directed to remove the proposed revisions to Attachment Y to incorporate Service Upgrades into SPP's Transmission Owner Selection Process.

The Commission found that SPP's November 15, 2013 Compliance Filing partially complies with the directives in the First Compliance Order. The Commission accepted SPP's Second Compliance Filing to be effective March 30, 2014, subject to a further compliance filing.

SPP's compliance filing should also address the following issues:

- 1) a revised definition of merchant transmission developer to remove the provision requiring that a merchant transmission developer not intend to transfer functional control over its transmission facilities to the transmission provider;
- 2) a modified definition of upgrades so that only the replacement of part of an existing transmission facility can be considered an upgrade;
- 3) include the reference, "[a]s determined in accordance with Section I.2 of this Attachment Y," at the beginning of section I.1 of the Tariff; and
- 4) revise the Tariff to specify that the Industry Expert Panel will only consider the quantitative cost impact of material on hand, assets on hand, and rights-of-way ownership, control, or acquisition when evaluating a bid under the rate analysis category, and therefore, restore related provisions in Attachment Y.

Regulatory Status Report

ER13-367

SPP's compliance filing is due on December 15, 2014.

Submission of Revisions to its Membership Agreement to Comply with Order No. 1000

On October 16, 2014, FERC issued an Order on Rehearing and Compliance.

The Commission granted in part and denied in part the requests for rehearing.

The Commission affirmed the finding in the First Compliance Order that, because Byway facilities are selected as part of SPP's regional transmission planning process and a portion of the cost of Byway facilities is allocated regionally, SPP must eliminate the federal right of first refusal for Byway facilities to comply with Order No. 1000.

On rehearing, SPP and Oklahoma Gas and Electric Company disagreed with the Commission's finding that SPP must remove Tariff provisions that require SPP to consider state law and rights-of-way at two early stages of the competitive solicitation process. On reconsideration, the Commission agreed and granted the requests for rehearing with respect to these provisions. SPP is to restore the provisions as proposed in its First Compliance Filing.

The Commission granted rehearing and found that exclusion of Service Upgrades from the proposed definition of Competitive Upgrades is consistent with Order No. 1000. The Commission agreed that Service Upgrades should not be included in the definition of Competitive Upgrades. The Commission found that SPP's Aggregate Study process is not an Order No. 1000 regional transmission planning process. The Commission found that Service Upgrades are not selected in the regional transmission plan for purposes of cost allocation and are not identified in a regional transmission planning process as the more efficient or cost-effective solution to regional transmission needs. SPP was directed to remove the proposed revisions to Attachment Y to incorporate Service Upgrades into SPP's Transmission Owner Selection Process.

The Commission found that SPP's November 15, 2013 Compliance Filing partially complies with the directives in the First Compliance Order. The Commission accepted SPP's Second Compliance Filing to be effective March 30, 2014, subject to a further compliance filing.

SPP's compliance filing should also address the following issues:

- 1) a revised definition of merchant transmission developer to remove the provision requiring that a merchant transmission developer not intend to transfer functional control over its transmission facilities to the transmission provider;
- 2) a modified definition of upgrades so that only the replacement of part of an existing transmission facility can be considered an upgrade;
- 3) include the reference, "[a]s determined in accordance with Section I.2 of this Attachment Y," at the beginning of section I.1 of the Tariff; and
- 4) revise the Tariff to specify that the Industry Expert Panel will only consider the quantitative cost impact of material on hand, assets on hand, and rights-of-way ownership, control, or acquisition when evaluating a bid under the rate analysis category, and therefore, restore related provisions in Attachment Y.

SPP's compliance filing is due on December 15, 2014.

ER13-1864

Joint Operating Agreement ("JOA") between SPP and the Midcontinent Independent System Operator, Inc. ("MISO") to Include Market-to-Market ("M2M") Terms and Conditions (SPP Rate Schedule FERC No. 9)

Regulatory Status Report

On October 1, 2014, Electric Power Supply Association filed a Motion to Intervene Out-of-Time.

On October 7, 2014, parties filed Initial Post-Technical Conference Comments.

On October 7, 2014, SPP filed Initial Post-Technical Conference Comments.

SPP stated:

- 1) the Commission should approve deferred implementation of Day-Ahead Firm Flow Entitlement adjustment and settlement mechanism;
- 2) SPP anticipates near-term resolution of the parties' disagreement on procedures for designation of new Market-to-Market flowgates; and
- 3) the Independent Market Monitor's Protest offers no credible basis to reject SPP's interface pricing methodology.

On October 22, 2014, the Midcontinent Independent System Operator, Inc. filed Post-Technical Conference Reply Comments. MISO proposed new language to the Joint Operating Agreement to address the creation of Market-to-Market flowgates. MISO requested that the Commission direct SPP to submit this language in a compliance filing within 30 days of the Commission's order accepting the Market-to-Market protocols effective March 1, 2015.

On October 22, 2014, PJM Interconnection, L.L.C. filed Post-Technical Conference Reply Comments.

PJM stated that it continues to support utilizing a common interface definition, which allows each RTO to calculate losses and congestion using its own model. PJM stated it is willing to discuss an alternative hybrid proposal that 1) implements a common interface at the RTOs' seam for market-to-market flowgates; and 2) allows for the use of either the same common interface or separate interface definition, such as a static common interface, for non-market-to-market flowgates.

PJM also stated that based on its extensive and ongoing analysis, temporary market-to-market flowgates on the PJM-MISO seam due to, among other causes, scheduled transmission outages has been a contributor to a trend of increased PJM Financial Transmission Rights ("FTR") underfunding within PJM. As PJM stated in its initial comments, market-to-market flowgates added to the market-to-market process with short notice can be tantamount to adding a brand new constraint to the model that was not monitored in the FTR auctions. These short-notice additions make it difficult for PJM to accurately predict day-ahead market conditions, which in turn exposes PJM to FTR revenue inadequacy.

On October 22, 2014, SPP filed Post-Technical Conference Reply Comments.

SPP stated:

- 1) no party considers implementation of a Firm Flow Entitlement adjustment mechanism necessary to the start up of Market-to-Market coordination;
- 2) SPP and MISO have reached an agreement on revised flowgate designation procedures;
- 3) the complex issue of interface pricing should be left to the parties to investigate and, as necessary, develop revised price calculations.

ER14-1174

Unexecuted Firm Point-To-Point Transmission Service Agreement between SPP as Transmission Provider and Midcontinent Independent System Operator, Inc. ("MISO") as Transmission Customer

Regulatory Status Report

On October 21, 2014, Judge Cintron filed a Settlement Judge Report, recommending that settlement procedures continue. The next settlement conference is scheduled for October 23, 2014.

On October 27, 2014, Judge Cintron issued an Order Scheduling Settlement Conference to be held on November 20, 2014.

ER14-2399

Submission of Tariff Revisions to Attachment AE for the Integrated Marketplace

On October 29, 2014, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company filed a Motion to Intervene Out-of-Time.

ER14-2445

Midcontinent Independent System Operator, Inc. ("MISO") Submission of Tariff Revisions to Modify the Demand Curves Associated with Sub-Regional Power Balance Constraints ("SRPBC")

On October 14, 2014, the Midcontinent Independent System Operator, Inc. submitted its response to the September 12, 2014 Deficiency Letter.

ER14-2553

Order No. 681 Compliance Filing to Implement Long-Term Congestion Rights ("LTCRs")

On October 28, 2014, FERC issued an Order Conditionally Accepting Tariff Revisions, Subject to Compliance Filing.

The Commission found that SPP complied with Guidelines 1, 2, 4, 6, and 7 found in Order No. 681.

The Commission directed SPP to include in its compliance filing:

- 1) propose a process for offering LTCRs for transmission upgrades to "any party". In addition, if SPP intends to offer transmission revenue credits under Attachment Z2 as an option in addition to offering LTCRs for participant-funded upgrades, SPP must address in its compliance filing how the provision of Attachment Z2 revenue credits will work alongside the provision of LTCRs for participant-funded upgrades in a way that is just and reasonable and consistent with Order No. 681 (Guideline 3);
- 2) revisions to the proposal to allow load serving entities to nominate candidate LTCRs prior to the performance of a simultaneous feasibility test to determine the availability of the nominated LTCRs (Guideline 5);
- 3) demonstrate that SPP's current transmission planning process provides for the continue feasibility of LTCRs or, alternatively, submit Tariff revisions to include such a provision in SPP's planning process;
- 4) revise the Tariff to include the clarification that the term Network Integration Transmission Service Candidate LTCRs should appear in section 7.1.3(1) instead of Candidate LTCRs, and include parallel language, concerning the transfer of LTCRs to account for wholesale load shifts between transmission customers, in subsections 7.1.3(2), (3), and (4);
- 5) include revisions SPP proposed in its Answer to section 7.2 and 7.2.1.

The proposed revisions were conditionally accepted, to become effective on February 1, 2015, subject to a compliance filing due no later than November 28, 2014.

ER14-2555

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Arkansas Electric Cooperative Corporation ("AECC") as Network Customer, and Oklahoma Gas and Electric Company ("OG&E") as Host Transmission Owner

Regulatory Status Report

On October 15, 2014, FERC issued a letter order accepting the agreement, effective July 1, 2014 as requested.

This order constitutes final agency action.

ER14-2570

Order No. 792 Compliance Filing (Small Generator Interconnection Procedures and Agreement)

On October 8, 2014, SPP submitted an amendment to its Order No. 792 Compliance Filing to correct a reference in Section 14.1 of Attachment V.

ER14-2600

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Oklahoma Municipal Power Authority ("OMPA") as Network Customer, and American Electric Power Service Corporation ("AEP"), Oklahoma Gas and Electric Company ("OG&E") and Western Farmers Electric Cooperative ("WFEC") as Host Transmission Owners

On October 2, 2014, FERC issued a letter order accepting the agreement, effective July 1, 2014 as requested.

This order constitutes final agency action.

ER14-2675

Generator Interconnection Agreement ("GIA") between Waverly Wind Farm, LLC ("Waverly Wind") as Interconnection Customer and Westar Energy, Inc. ("Westar") as Transmission Owner

On October 6, 2014, FERC issued a letter order accepting the agreement, effective July 31, 2014 as requested.

This order constitutes final agency action.

ER14-2684

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Associated Electric Cooperative, Inc. ("AECI") as Network Customer, and Oklahoma Gas and Electric Company ("OG&E") as Host Transmission Owner

On October 15, 2014, FERC issued a letter order accepting the agreement, effective July 1, 2014 as requested.

This order constitutes final agency action.

ER14-2739

Generator Interconnection Agreement ("GIA") between Pawnee Wind Farm, LLC ("Pawnee Wind") as Interconnection Customer and Omaha Public Power District ("OPPD") as Transmission Owner

On October 21, 2014, FERC issued a letter order accepting the agreement, effective June 12, 2014 as requested.

This order constitutes final agency action.

ER14-2753

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Sunflower Electric Power Corporation ("Sunflower") as Network Customer and Sunflower, Midwest Energy, Inc. ("Midwest"), ITC Great Plains, Inc. ("ITC"), and Mid-Kansas Electric Company, LLC ("Mid-Kansas") as

Regulatory Status Report

Host Transmission Owners

On October 28, 2014, FERC issued a letter order accepting the agreement, effective August 1, 2014 as requested.

This order constitutes final agency action.

ER14-2770

Generator Interconnection Agreement ("GIA") between Steele Flats Wind Project, LLC ("Steele Flats") as Interconnection Customer and Nebraska Public Power District ("NPPD") as Transmission Owner

On October 28, 2014, FERC issued a letter order accepting the agreement, effective May 23, 2014 as requested.

This order constitutes final agency action.

ER14-2850

Submission of Tariff Revisions to Facilitate the Integration of Western Area Power Administration - Upper Great Plains Region ("Western-UGP"), Basin Electric Power Cooperative ("Basin Electric"), and Heartland Consumers Power District ("Heartland") (collectively the "IS Parties"), which Jointly Own and Operate the Integrated System, into the SPP Regional Transmission Organization ("RTO")

On October 2, 2014, Nebraska Public Power District filed a Motion to Intervene and Protest.

NPPD stated it supports the inclusion of the IS Parties as new Transmission Owner-Members of SPP, and that its Protest is limited to SPP's failure to provide Western-UGP's Statutory Load Obligation located in SPP's existing zones the same "Federal Service Exemption" available to Statutory Load Obligations located in the new Zone 19 and points external to the SPP system. NPPD also stated it protests SPP's proposal to limit access to the "Co-Supplier" tariff revisions to co-suppliers of preference customers located in the new Zone 19 and to co-suppliers at points external to the SPP system. NPPD further stated that it fully supports the approval of the Federal Service Exemption and Co-Supplier provisions and requests the Commission to make clear such provisions will be made available in NPPD Zone 17.

Numerous parties filed Motions to Intervene.

On October 8, 2014, Heartland Consumers Power District filed a Motion to Intervene and Comments in support of SPP's September 11, 2014 Filing.

On October 9, 2014, Western Area Power Administration filed a Motion to Intervene and Comments in Support of SPP's September 11, 2014 Filing.

On October 9, 2014, Montana Consumer Counsel filed a Motion to Intervene and Protest. MCC requested that the Commission require SPP and the IS Parties to analyze, quantify and demonstrate remediation of any adverse impact of their proposed migration from the Midcontinent Independent System Operator, Inc. to SPP on wholesale and transmission costs affecting the retail costs of Montana retail electric customers.

On October 9, 2014, Montana-Dakota Utilities Co. filed a Motion to Intervene and Comments. MDU requested that the Commission confirm that Western UGP's and Basin Electric's use of MDU's transmission system would allow MDU to receive credits under Section 30.9 of SPP's Tariff, without the imposition of any new requirements or conditions not supported by the

Regulatory Status Report

existing SPP Tariff or which are otherwise intended to compel MDU to effectively become a transmission owning member of SPP for all or part of its system.

On October 9, 2014, Basin Electric Power Cooperative filed a Motion to Intervene and Comments in support of SPP's September 11, 2014 Filing.

On October 9, 2014, Otter Tail Power Company filed a Motion to Intervene and Comments.

Otter Tail requested that the Commission condition its approval of SPP's proposed tariff revisions on a requirement that SPP will: (i) not assess Otter Tail any new charges for serving Otter Tail's load within the expanded SPP footprint as it concerns the Integrated Transmission System jointly developed and owned by Otter Tail and Central Power Electric Cooperative; and (ii) provide for service to Otter Tail's native load customers within the Western Balancing Authority without exposure to discriminatory SPP pricing.

On October 9, 2014, Missouri River Energy Services filed a Motion for Leave to Intervene, Provisional Request for Technical Conference, and Protest.

MRES stated:

- 1) the proposal will significantly disrupt long standing transmission and power supply arrangements and require appropriate accommodations;
- 2) grandfathered agreement 496 should be converted from an exempt to a carved-out transaction;
- 3) the Co-Supply arrangement must be amended to accommodate the possibility of two Co-Suppliers at a delivery point;
- 4) the IS Parties' integration into SPP will cause differential rate impacts on IS customers and will cause a timing dilemma for potential requests for SPP Network Integration Transmission Service ("NITS");
- 5) the Upper Missouri Zone requires additional detail;
- 6) the IS integration perpetuates pancaked rates for MRES and its members;
- 7) MRES must be permitted to use its maximum SPP NITS load for purposes of meeting its Midcontinent Independent System Operator, Inc.'s must offer requirement if MRES retains MISO load as part of its SPP NITS; and
- 8) the Commission should affirmatively condition any approval of SPP's revisions to its Governing Documents on the changes proposed herein.

On October 9, 2014, the Public Utility Commission of Texas filed Comments.

The PUCT stated that SPP has not provided sufficient evidence to support its claim that the proposal to facilitate the membership of the IS is supported by all stakeholders or that the proposal is in the public interest. The PUCT requested that the Commission order SPP to revise the tariff language so that the membership of the IS does not result in inequitable impacts to existing members of SPP and ratepayers within the SPP footprint, including Texas. Should the Commission approve the proposed filings, the PUCT recommended that such action be taken with particular note that the process used for integrating the IS and the changes to SPP's governing documents, including the tariffs, are specific to these facts and should not be viewed as precedential for future membership proposals.

On October 9, 2014, the North Dakota Public Service Commission filed a Notice of Intervene and Comments. NDPSC stated that it supports the comments filed by Montana-Dakota Utilities Co. and Otter Tail Power Company because of the significant impact the planned integration could have on the utility customers of MDU and Otter Tail located in North Dakota

Regulatory Status Report

and whose retail rates are under the jurisdiction of the NDPSC.

On October 9, 2014, the Municipal Energy Agency of Nebraska filed a Motion to Intervene and Comments.

MEAN stated it supports the integration of the IS into SPP, but seeks certain clarifications and minor modifications with respect to SPP's filing:

- 1) use of the Federal Service Exemption Transfer Point by preference customers within SPP but outside of the Upper Missouri Zone should be clarified;
- 2) SPP must similarly facilitate arrangements for preference customers located outside of SPP;
- 3) MEAN's deliveries to Rockford, Iowa should be accommodated; and
- 4) SPP should be required to clarify when it will start processing transmission service requests that would utilize the IS facilities.

On October 9, 2014, the State Corporation Commission of the State of Kansas filed a Motion to Intervene and to Consolidate Proceedings and Protest.

The KCC stated that the proposed Tariff changes are unjust, unreasonable, and unduly discriminatory, in part, because SPP has not demonstrated that these Tariff changes will result in just and reasonable rates, particularly for Kansas ratepayers for the following reasons:

- 1) SPP has not submitted sufficient worksheets and supporting explanations to justify that the proposed Tariff language and cost allocation methodologies in the Filings are just and reasonable;
- 2) the Filings propose unduly discriminatory Tariff provisions which would result in unjust, unreasonably, and unduly discriminatory transmission rates for the IS Members, as compared with all other SPP members;
- 3) the Filings propose unduly discriminatory Federal Service Exemption Tariff provisions for Western-UGP which would unjustly and unreasonably: (a) exempt Western-UGP from cost allocation for third party transmission facilities; and (b) grant Western-UGP unjust, unreasonable, and unduly preferential rights to use the entire SPP transmission system; and (c) establish Western-UGP as an inequitable "free rider"; and
- 4) the proposed Tariff changes would establish inequitable precedent that entities desiring to join an RTO can negotiate "sweetheart deals" with an RTO in exchange for reducing the RTO's administrative rates.

On October 9, 2014, South Dakota Public Utilities Commission filed a Motion to Intervene and Comments.

The SDPUC stated that it supports Montana-Dakota Utilities Co.'s proposal that Western-UGP's and Basin Electric's use of MDU's transmission system should be appropriately accounted for either through credits for Network Customer owned transmission facilities pursuant to Section 30.9 of SPP's Tariff or some similar crediting mechanism or exemption/exception.

The SDPUC stated it also supports the comments of Otter Tail Power Company requesting protections to Otter Tail's customers from the assessment charges under SPP's Tariff.

On October 9, 2014, Midcontinent Independent System Operator, Inc. filed a Motion to Intervene and Limited Protest.

MISO stated:

Regulatory Status Report

- 1) the proposed regional cost allocation for Basin Electric's projects is unjust and unreasonable because it is inconsistent with SPP's cost allocation methodology;
- 2) the proposed inclusion of Basin Electric's Schedule 2 projects in regional cost allocation is contrary to the Commission's cost causation precedent; and
- 3) to the extent the Commission decides to accept SPP's proposal, it should clarify such acceptance would not prejudge the issue of whether any of Basin Electric's upgrade costs can be passed through to MISO under the SPP Service Agreement.

On October 22, 2014, Entergy Services, Inc. filed a Motion to File Limited Protest Out of Time and Limited Protest.

Entergy stated it fully supports and adopts the arguments raised in the Protest filed by the Midcontinent Independent System Operator, Inc.

Entergy also stated it protests the proposed use of a flexible new type of Network Integration Transmission Service to allow Basin Electric and Heartland to serve Western-UGP's load. Entergy stated that SPP does not offer to MISO, on comparable terms and conditions, the flexibility proposed for Basin Electric and Heartland to designate and undesignate loads on a daily basis and thereby minimize MISO's transmission charges.

On October 24, 2014, Basin Electric Power Cooperative filed an answer in response to comments and protests.

Basin Electric stated:

- 1) the Commission should accept SPP's answer and accept SPP's filings as initially submitted;
- 2) the Commission should dismiss the issues raised in Otter Tail Power Company's Comments; and
- 3) Montana-Dakota's concerns relating to the interconnection and common use agreement are valid.

On October 24, 2014, Western Area Power Administration filed an answer in response to comments and protests.

Western stated it supports SPP's Answer.

Western addressed several issues that were protested which are critical to enabling Western-UGP to join SPP. Namely, Western-UGP's authority, the Federal Service Exemption, Schedule 11 Region-wide charges, Congestion and Loss charges, Co-Supply, Operating withing the Upper Missouri Zone, Comparable Benefit, and the SPP Stakeholder Process.

On October 24, 2014, SPP filed an answer in response to comments and protests filed in this proceeding.

SPP stated:

- 1) criticisms of SPP or the stakeholder process in the development of the proposal are unfounded and not based on factual evidence;
- 2) the Commission should reject Midcontinent Independent System Operator, Inc.'s ("MISO") and Entergy Services, Inc.'s ("Entergy") attempts to inject issues that are beyond the scope of this proceeding;
- 3) SPP's proposed treatment of certain Basin Electric transmission projects is consistent with

Regulatory Status Report

SPP's current and past practices and is just and reasonable;

- 4) contrary to MISO and Entergy, SPP's proposed clarification of the Basin Upgrades as Base Plan Upgrades is consistent with the Commission's cost causation precedent;
- 5) non-SPP Market Participants are not entitled to be held harmless or to a seams mitigation procedure;
- 6) the Co-Supply arrangement is narrowly construed to preserve the status quo within the IS Parties' footprint;
- 7) the Federal Service Exemption is constructed to allow Western-UGP to meet its Statutory Load Obligations within the RTO construct and design of the Integrated Marketplace;
- 8) rate pancaking is outside the scope of this proceeding;
- 9) Missouri River Energy Services' request for carve out status for grandfathered agreement #496 should be rejected as already settled in a previous docket;
- 10) the North and South Dakota Commission's comments will be resolved by future action on Montana-Dakota Utilities Co.'s requests;
- 11) concerns about details of IS Parties' transmission service or speculative issues need not be addressed in the September 11 Filing.

SPP also addressed Montana-Dakota Utilities Co.'s concerns regarding receipt of SPP Network Integration Transmission Service, SPP Membership and Section 30.9 credits.

On October 24, 2014, Nebraska Public Power District filed an answer in response to the protests filed by the Kansas Corporation Commission and Missouri River Energy Services.

NPPD stated:

- 1) the Federal Service Exemption is not unduly discriminatory but should be extended to all SPP Zones; and
- 2) the Co-Supplier Tariff provision should be extended to all SPP Zones.

On October 24, 2014, Heartland Consumers Power District filed an answer in response to comments and protests.

Heartland stated it has reviewed all the comments and protests submitted and continues to maintain that all SPP's proposed revisions to the Tariff and Governing Documents are just and reasonable. Heartland requested that the Commission accept SPP's filings to allow the IS Parties sufficient time to transition into SPP.

Heartland also stated its full support for the arguments and requests for relief in SPP's Answer and urges the Commission to adopt them.

On October 29, 2014, Minnesota Public Utilities Commission filed a Motion to File Comments Out of Time and Comments in support of Otter Tail Power Company's comments filed on October 9, 2014.

ER14-2851

Submission of Bylaws and Membership Agreement ("Governing Documents") Revisions to Facilitate the Integration of Western Area Power Administration - Upper Great Plains Region ("Western-UGP"), Basin Electric Power Cooperative ("Basin Electric"), and Heartland Consumers Power District ("Heartland") (collectively the "IS Parties"), which Jointly Own and Operate the Integrated System, into the SPP Regional Transmission Organization ("RTO")

Numerous parties filed Motions to Intervene.

On October 2, 2014, Nebraska Public Power District filed a Motion to Intervene and Protest.

Regulatory Status Report

NPPD stated it supports the inclusion of the IS Parties as new Transmission Owner-Members of SPP, and that its Protest is limited to SPP's failure to provide Western-UGP's Statutory Load Obligation located in SPP's existing zones the same "Federal Service Exemption" available to Statutory Load Obligations located in the new Zone 19 and points external to the SPP system. NPPD also stated it protests SPP's proposal to limit access to the "Co-Supplier" tariff revisions to co-suppliers of preference customers located in the new Zone 19 and to co-suppliers at points external to the SPP system. NPPD further stated that it fully supports the approval of the Federal Service Exemption and Co-Supplier provisions and requests the Commission to make clear such provisions will be made available in NPPD Zone 17.

On October 8, 2014, Heartland Consumers Power District filed a Motion to Intervene and Comments in support of SPP's September 11, 2014 Filing.

On October 9, 2014, Montana-Dakota Utilities Co. filed a Motion to Intervene and Comments. MDU requested that the Commission confirm that Western UGP's and Basin Electric's use of MDU's transmission system would allow MDU to receive credits under Section 30.9 of SPP's Tariff, without the imposition of any new requirements or conditions not supported by the existing SPP Tariff or which are otherwise intended to compel MDU to effectively become a transmission owning member of SPP for all or part of its system.

On October 9, 2014, Montana Consumer Counsel filed a Motion to Intervene and Protest. MCC requested that the Commission require SPP and the IS Parties to analyze, quantify and demonstrate remediation of any adverse impact of their proposed migration from the Midcontinent Independent System Operator, Inc. to SPP on wholesale and transmission costs affecting the retail costs of Montana retail electric customers.

On October 9, 2014, Western Area Power Administration filed a Motion to Intervene and Comments in Support of SPP's September 11, 2014 Filing.

On October 9, 2014, South Dakota Public Utilities Commission filed a Motion to Intervene and Comments.

The SDPUC stated that it supports Montana-Dakota Utilities Co.'s proposal that Western-UGP's and Basin Electric's use of MDU's transmission system should be appropriately accounted for either through credits for Network Customer owned transmission facilities pursuant to Section 30.9 of SPP's Tariff or some similar crediting mechanism or exemption/exception.

The SDPUC stated it also supports the comments of Otter Tail Power Company requesting protections to Otter Tail's customers from the assessment charges under SPP's Tariff.

On October 9, 2014, the State Corporation Commission of the State of Kansas filed a Motion to Intervene and to Consolidate Proceedings and Protest.

The KCC stated that the proposed Tariff changes are unjust, unreasonable, and unduly discriminatory, in part, because SPP has not demonstrated that these Tariff changes will result in just and reasonable rates, particularly for Kansas ratepayers for the following reasons:

- 1) SPP has not submitted sufficient worksheets and supporting explanations to justify that the proposed Tariff language and cost allocation methodologies in the Filings are just and reasonable;
- 2) the Filings propose unduly discriminatory Tariff provisions which would result in unjust,

Regulatory Status Report

unreasonably, and unduly discriminatory transmission rates for the IS Members, as compared with all other SPP members;

3) the Filings propose unduly discriminatory Federal Service Exemption Tariff provisions for Western-UGP which would unjustly and unreasonably: (a) exempt Western-UGP from cost allocation for third party transmission facilities; and (b) grant Western-UGP unjust, unreasonable, and unduly preferential rights to use the entire SPP transmission system; and (c) establish Western-UGP as an inequitable "free rider"; and

4) the proposed Tariff changes would establish inequitable precedent that entities desiring to join an RTO can negotiate "sweetheart deals" with an RTO in exchange for reducing the RTO's administrative rates.

On October 9, 2014, the Municipal Energy Agency of Nebraska filed a Motion to Intervene and Comments.

MEAN stated it supports the integration of the IS into SPP, but seeks certain clarifications and minor modifications with respect to SPP's filing:

1) use of the Federal Service Exemption Transfer Point by preference customers within SPP but outside of the Upper Missouri Zone should be clarified;

2) SPP must similarly facilitate arrangements for preference customers located outside of SPP;

3) MEAN's deliveries to Rockford, Iowa should be accommodated; and

4) SPP should be required to clarify when it will start processing transmission service requests that would utilize the IS facilities.

On October 9, 2014, the North Dakota Public Service Commission filed a Notice of Intervene and Comments. NDPSC stated that it supports the comments filed by Montana-Dakota Utilities Co. and Otter Tail Power Company because of the significant impact the planned integration could have on the utility customers of MDU and Otter Tail located in North Dakota and whose retail rates are under the jurisdiction of the NDPSC.

On October 9, 2014, the Public Utility Commission of Texas filed Comments.

The PUCT stated that SPP has not provided sufficient evidence to support its claim that the proposal to facilitate the membership of the IS is supported by all stakeholders or that the proposal is in the public interest. The PUCT requested that the Commission order SPP to revise the tariff language so that the membership of the IS does not result in inequitable impacts to existing members of SPP and ratepayers within the SPP footprint, including Texas. Should the Commission approve the proposed filings, the PUCT recommended that such action be taken with particular note that the process used for integrating the IS and the changes to SPP's governing documents, including the tariffs, are specific to these facts and should not be viewed as precedential for future membership proposals.

On October 9, 2014, Missouri River Energy Services filed a Motion for Leave to Intervene, Provisional Request for Technical Conference, and Protest.

MRES stated:

1) the proposal will significantly disrupt long standing transmission and power supply arrangements and require appropriate accommodations;

2) grandfathered agreement 496 should be converted from an exempt to a carved-out transaction;

3) the Co-Supply arrangement must be amended to accommodate the possibility of two Co-Suppliers at a delivery point;

Regulatory Status Report

- 4) the IS Parties' integration into SPP will cause differential rate impacts on IS customers and will cause a timing dilemma for potential requests for SPP Network Integration Transmission Service ("NITS");
- 5) the Upper Missouri Zone requires additional detail;
- 6) the IS integration perpetuates pancaked rates for MRES and its members;
- 7) MRES must be permitted to use its maximum SPP NITS load for purposes of meeting its Midcontinent Independent System Operator, Inc.'s must offer requirement if MRES retains MISO load as part of its SPP NITS; and
- 8) the Commission should affirmatively condition any approval of SPP's revisions to its Governing Documents on the changes proposed herein.

On October 9, 2014, Otter Tail Power Company filed a Motion to Intervene and Comments.

Otter Tail requested that the Commission condition its approval of SPP's proposed tariff revisions on a requirement that SPP will: (i) not assess Otter Tail any new charges for serving Otter Tail's load within the expanded SPP footprint as it concerns the Integrated Transmission System jointly developed and owned by Otter Tail and Central Power Electric Cooperative; and (ii) provide for service to Otter Tail's native load customers within the Western Balancing Authority without exposure to discriminatory SPP pricing.

On October 9, 2014, Basin Electric Power Cooperative filed a Motion to Intervene and Comments in support of SPP's September 11, 2014 Filing.

On October 9, 2014, Midcontinent Independent System Operator, Inc. filed a Motion to Intervene and Limited Protest.

MISO stated:

- 1) the proposed regional cost allocation for Basin Electric's projects is unjust and unreasonable because it is inconsistent with SPP's cost allocation methodology;
- 2) the proposed inclusion of Basin Electric's Schedule 2 projects in regional cost allocation is contrary to the Commission's cost causation precedent; and
- 3) to the extent the Commission decides to accept SPP's proposal, it should clarify such acceptance would not prejudice the issue of whether any of Basin Electric's upgrade costs can be passed through to MISO under the SPP Service Agreement.

On October 22, 2014, Entergy Services, Inc. filed a Motion to File Limited Protest Out of Time and Limited Protest.

Entergy stated it fully supports and adopts the arguments raised in the Protest filed by the Midcontinent Independent System Operator, Inc.

Entergy also stated it protests the proposed use of a flexible new type of Network Integration Transmission Service to allow Basin Electric and Heartland to serve Western-UGP's load. Entergy stated that SPP does not offer to MISO, on comparable terms and conditions, the flexibility proposed for Basin Electric and Heartland to designate and undesignate loads on a daily basis and thereby minimize MISO's transmission charges.

On October 24, 2014, Basin Electric Power Cooperative filed an answer in response to comments and protests.

Basin Electric stated:

- 1) the Commission should accept SPP's answer and accept SPP's filings as initially

Regulatory Status Report

submitted;

2) the Commission should dismiss the issues raised in Otter Tail Power Company's Comments; and

3) Montana-Dakota's concerns relating to the interconnection and common use agreement are valid.

On October 24, 2014, Heartland Consumers Power District filed an answer in response to comments and protests.

Heartland stated it has reviewed all the comments and protests submitted and continues to maintain that all SPP's proposed revisions to the Tariff and Governing Documents are just and reasonable. Heartland requested that the Commission accept SPP's filings to allow the IS Parties sufficient time to transition into SPP.

Heartland also stated its full support for the arguments and requests for relief in SPP's Answer and urges the Commission to adopt them.

On October 24, 2014, SPP filed an answer in response to comments and protests filed in this proceeding.

SPP stated:

- 1) criticisms of SPP or the stakeholder process in the development of the proposal are unfounded and not based on factual evidence;
- 2) the Commission should reject Midcontinent Independent System Operator, Inc.'s ("MISO") and Entergy Services, Inc.'s ("Entergy") attempts to inject issues that are beyond the scope of this proceeding;
- 3) SPP's proposed treatment of certain Basin Electric transmission projects is consistent with SPP's current and past practices and is just and reasonable;
- 4) contrary to MISO and Entergy, SPP's proposed clarification of the Basin Upgrades as Base Plan Upgrades is consistent with the Commission's cost causation precedent;
- 5) non-SPP Market Participants are not entitled to be held harmless or to a seams mitigation procedure;
- 6) the Co-Supply arrangement is narrowly construed to preserve the status quo within the IS Parties' footprint;
- 7) the Federal Service Exemption is constructed to allow Western-UGP to meet its Statutory Load Obligations within the RTO construct and design of the Integrated Marketplace;
- 8) rate pancaking is outside the scope of this proceeding;
- 9) Missouri River Energy Services' request for carve out status for grandfathered agreement #496 should be rejected as already settled in a previous docket;
- 10) the North and South Dakota Commission's comments will be resolved by future action on Montana-Dakota Utilities Co.'s requests;
- 11) concerns about details of IS Parties' transmission service or speculative issues need not be addressed in the September 11 Filing.

SPP also addressed Montana-Dakota Utilities Co.'s concerns regarding receipt of SPP Network Integration Transmission Service, SPP Membership and Section 30.9 credits.

On October 24, 2014, Nebraska Public Power District filed an answer in response to the protests filed by the Kansas Corporation Commission and Missouri River Energy Services.

NPPD stated:

- 1) the Federal Service Exemption is not unduly discriminatory but should be extended to all

Regulatory Status Report

SPP Zones; and
2) the Co-Supplier Tariff provision should be extended to all SPP Zones.

On October 24, 2014, Western Area Power Administration filed an answer in response to comments and protests.

Western stated it supports SPP's Answer.

Western addressed several issues that were protested which are critical to enabling Western-UGP to join SPP. Namely, Western-UGP's authority, the Federal Service Exemption, Schedule 11 Region-wide charges, Congestion and Loss charges, Co-Supply, Operating withing the Upper Missouri Zone, Comparable Benefit, and the SPP Stakeholder Process.

On October 29, 2014, Minnesota Public Utilities Commission filed a Motion to File Comments Out of Time and Comments in support of Otter Tail Power Company's comments filed on October 9, 2014.

ER14-2852

Westar Energy, Inc.'s ("Westar") Compliance Filing Revising Formula Rate Protocols

On October 2, 2014, Kansas Power Pool and Missouri Joint Municipal Electric Utility Commission filed Motions to Intervene.

On October 2, 2014, Kansas Electric Power Cooperative, Inc. filed a Protest. KEPCO requested that the Commission (i) reject the Westar Compliance Filing to the extent that it seeks to make changes to the protocols that diminish the rights of affected parties, including those changes noted in the body of this pleading, as such filing both violates the FERC Show Cause Order and Federal Power Act Section 205; (ii) cure the unduly discriminatory and preferential treatment of affected parties (in the current and filed protocols) by providing that affected parties and Westar must be afforded equal time to detect errors and have them corrected; and (iii) make such other changes as may be warranted by the facts and circumstances noted herein.

On October 2, 2014, the State Corporation Commission of the State of Kansas filed a Motion to Intervene and Protest.

The KCC stated that Westar has not provided sufficient documentary evidence in its filing to justify all of the proposed changes.

On October 2, 2014, FERC issued a Notice Granting Extension of Time to file comments. Comments are now due on October 22, 2014.

On October 17, 2014, Westar Energy, Inc. filed an answer in response to the Protests filed by the State Corporation Commission of the State of Kansas and Kansas Electric Power Cooperative, Inc.

Westar stated:

- 1) Westar's Compliance Filing is squarely within the scope of the Commission's Order;
- 2) KEPCO's reliance on the terms of a previous settlement agreement is misplaced;
- 3) many of the arguments made by KEPCO and the KCC are directly contrary to Commission precedent;
- 4) KEPCO's and the KCC's suggestion that Westar is curtailing customers' rights is unfounded; and

Regulatory Status Report

5) there is no need for the Commission to set this proceeding for hearing.

On October 21, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments. The MoPSC requested that the Commission require Westar to make changes proposed in these Comments.

On October 30, 2014, Westar Energy, Inc. filed an answer in response to the protest filed by Kansas Electric Power Cooperative, Inc. filed on October 2, 2014.

ER14-2882

The Empire District Electric Company's ("Empire") Compliance Filing Revising Formula Rate Protocols

On October 3, 2014, FERC issued a Notice Granting Extension of Time to file comments. Comments are now due on October 27, 2014.

On October 9, 2014, the Empire Cities filed a Limited Protest.

The Cities stated that the Commission should require Empire to restore the protocols provision enabling the appointment of a Discovery Master to resolve discovery disputes in the course of an annual update proceeding. The Cities also stated that the Commission should clarify that no provision in the revised protocols limits the ability of an Interested Party to bring an action under the Federal Power Act to "challenge the inputs to, or the implementation of, the formula at whatever time they discover errors in the inputs or the implementation of the formula."

On October 24, 2014, The Empire District Electric Company filed an answer in response to the Empire Cities' Limited Protest.

On October 27, 2014, the Kansas Corporation Commission filed a Motion to Intervene and Protest.

KCC stated that Empire has not provided sufficient documentary evidence to justify the changes. The KCC is concerned that the three areas of concern identified by the Commission in its July 17, 2014 Order issued in EL14-73 have not all been adequately resolved. In particular, the KCC believes that Empire has unjustly and unreasonably reduced the procedural rights of interested parties, including the KCC, to investigate and to effectively participate in transmission formula rate reviews.

On October 27, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments.

The MoPSC stated that the Commission should not take a "one size fits all" approach to evaluation of the SPP Transmission Owner's Tariffs. The MoPSC also stated that it objects to Empire's changes that go beyond what is necessary for compliance with the Commission's July 17, 2014 Order issued in EL14-73. The MoPSC suggested several proposed changes to the protocols.

ER14-2884

Kansas City Power & Light Company's ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") Compliance Filing Revising Formula Rate Protocols

On October 3, 2014, City of Independence, Missouri and Missouri Joint Municipal Electric Utility Commission filed Motions to Intervene.

On October 3, 2014, FERC issued a Notice Granting Extension of Time to file comments. Comments are now due on October 27, 2014.

Regulatory Status Report

On October 27, 2014, the Kansas Corporation Commission filed a Motion to Intervene and Protest.

KCC stated that KCP&L has not provided sufficient documentary evidence to justify the changes. The KCC is concerned that the three areas of concern identified by the Commission in its July 17, 2014 Order issued in EL14-74 have not all been adequately resolved. In particular, the KCC believes that KCP&L has unjustly and unreasonably reduced the procedural rights of interested parties, including the KCC, to investigate and to effectively participate in transmission formula rate reviews.

On October 27, 2014, the Missouri Public Service Commission filed a Notice of Intervention and Comments.

The MoPSC stated that the Commission should not take a "one size fits all" approach to evaluation of the SPP Transmission Owner's Tariffs. The MoPSC suggested several proposed changes to the protocols.

ER14-2887

Submission of Tariff Revisions to Modify Section 2.2 and Attachment F to Clarify Reservation Priority for Existing Firm Service Customers

On October 6, 2014, TDU Intervenors filed a Motion to Intervene.

ER15-10

Submission of Tariff Amendments to Revise Interest Due on Certain Refunds and Other Payments

On October 1, 2014, SPP submitted Tariff revisions to replace the requirement to pay interest at the rate specified in the Commission's Regulations with a requirement to pay interest based on the actual interest earned in Tariff sections where the requirement to pay the Commission's specified interest rate could impose a financial burden on SPP, its members, and customers.

An effective date of December 1, 2014 was requested.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 8, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC filed a Motion to Intervene.

On October 22, 2014, the American Wind Energy Association and the Wind Coalition filed a Protest of SPP's October 1, 2014 Filing. The parties requested that the Commission reject SPP's proposed Tariff revisions, or in the alternative, accept and suspend the proposed revisions for the maximum period allowed of five months, subject to hearing and refund.

On October 22, 2014, Western Farmers Electric Cooperative filed a Motion to Intervene and Comments in support of SPP's October 1, 2014 Filing.

ER15-20

Submission of Tariff Revisions to Correct the Notice Requirement for Proposed Market Repricing Incidents

On October 2, 2014, SPP submitted revisions to Attachment AE Section 8.4 of the Tariff to correct the notice requirement for proposed market repricing incidents.

An effective date of March 1, 2014 was requested.

On October 7, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company,

Regulatory Status Report

LLC filed a Motion to Intervene.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 8, 2014, South Central Municipal-Cooperative Network, LLC filed a Motion to Intervene.

ER15-21

Submission of Tariff Revisions Regarding Review for and Reporting of Physical Withholding

On October 2, 2014, SPP submitted revisions to Attachment AG Section 4 of the Tariff necessary to focus and thereby improve SPP's process for monitoring and reporting Physical Withholding of Resource Capacity.

An effective date of March 1, 2014 was requested.

On October 3, 2014, Exelon Corporation filed a Motion to Intervene.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 7, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC filed a Motion to Intervene.

On October 23, 2014, Flat Ridge 2 Wind Energy LLC filed a Motion to Intervene.

On October 23, 2014, the TDU Intervenors filed a Motion to Intervene and Protest.

The parties stated:

- 1) applying SPP's market impact test to physical withholding has not been shown to be just and reasonable; and
- 2) SPP should be required to continue reporting all potential instances of physical withholding to the Commission.

ER15-42

Informational Filing to Notify the Commission of Implementation of Year-Three Reallocation of Revenue Requirements Pursuant to Attachments J and O for the Balanced Portfolio

On October 3, 2014, SPP filed an informational filing to notify the Commission of SPP's implementation of the year-three reallocation of revenue requirements in accordance with the Balanced Portfolio process described in Attachments J and O of the Tariff. SPP implemented the year-three reallocation of revenue requirements on October 1, 2014, which is consistent with the Commission's order in Docket No. ER12-2387, wherein the Commission approved an October 1st effective date for the initial reallocation of revenue requirements and for all subsequent reallocations for years two through five.

On October 7, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC filed a Motion to Intervene.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 9, 2014, Western Farmers Electric Cooperative filed a Motion to Intervene.

On October 24, 2014, Golden Spread Electric Cooperative, Inc. and Midwest Energy, Inc. filed Motions to Intervene.

On October 24, 2014, Mid-Kansas Electric Company, LLC, Midwest Energy, Inc., Sunflower

Regulatory Status Report

Electric Power Corporation, and Western Farmers Electric Cooperative filed Comments.

The parties stated while they are not protesting SPP's continued implementation of the Balanced Portfolio process in this docket, they do wish to be on record that they continue to have concerns, not yet addressed by SPP, with implementation of the Balanced Portfolio process, the resulting adverse impacts to transmission-owning utilities in the SPP region and any "unintended consequences" review that may have occurred since SPP implemented the Balanced Portfolio.

ER15-45 **Submission of Tariff Revisions to Revise Day-Ahead and Reliability Unit Commitment Make-Whole Payment ("MWP") Amounts**

On October 6, 2014, SPP submitted tariff revisions to revise Day-Ahead and Reliability Unit Commitment make-whole payment amounts.

An effective date of December 5, 2014 was requested.

On October 7, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC filed a Motion to Intervene.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 8, 2014, South Central Municipal-Cooperative Network, LLC filed a Motion to Intervene.

ER15-47 **Submission of Tariff Revisions to Specify the Minimum Operating Limits of a Non-Dispatchable Variable Energy Resource ("VER")**

On October 6, 2014, SPP submitted tariff revisions to specify the minimum operating limits that a Non-Dispatchable Variable Energy Resource must include when submitting Resource Offers into the Day-Ahead Market solution.

An effective date of December 5, 2014 was requested.

On October 7, 2014, American Electric Power Service Corporation filed a Motion to Intervene.

On October 7, 2014, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC filed a Motion to Intervene.

ER15-72 **Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Kaw Valley Electric Cooperative ("Kaw Valley") as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner**

On October 10, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, Kaw Valley Electric Cooperative, as Network Customer, as well as a NOA with Westar Energy, Inc. as Host Transmission Owner. SPP Service Agreement No. Third Revised 1976.

An effective date of August 1, 2014 was requested.

ER15-77 **Firm Point-To-Point Transmission Service Agreement between SPP as Transmission Provider and Kansas City Board of Public Utilities ("KCBPU") as Transmission Customer**

On October 14, 2014, SPP submitted an executed service agreement for Firm Point-To-Point

Regulatory Status Report

Transmission Service between SPP as Transmission Provider and Kansas City Board of Public Utilities as Transmission Customer. SPP Service Agreement No. Third Revised 2041.

An effective date of August 1, 2014 was requested.

ER15-158

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, KCP&L Greater Missouri Operations Company ("KCPL-GMO") as Network Customer and Host Transmission Owner, and Westar Energy, Inc. ("Westar") as Host Transmission Owner

On October 22, 2014, SPP submitted 1) an executed NITSA between SPP as Transmission Provider and KCP&L Greater Missouri Operations Company as Network Customer; and 2) an executed NOA between SPP as Transmission Provider, KCPL-GMO as both Network Customer and Host Transmission Owner, and Westar Energy, Inc. as Host Transmission Owner. SPP Service Agreement No. Eleventh Revised 1765.

An effective date of August 1, 2014 was requested.

ER15-162

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, City of Chanute, KS ("Chanute") as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner

On October 22, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, City of Chanute, KS as Network Customer, as well as a NOA with Westar Energy, Inc. as Host Transmission Owner. SPP Service Agreement No. First Revised 2881.

An effective date of August 1, 2014 was requested.

ER15-164

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Kansas Electric Power Cooperative, Inc. ("KEPCO") as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner

On October 23, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, Kansas Electric Power Cooperative, Inc. as Network Customer, as well as a NOA with Westar Energy, Inc. as Host Transmission Owner. SPP Service Agreement No. Thirteenth Revised 1636.

An effective date of August 1, 2014 was requested.

ER15-205

Transmission Interconnection Agreement Between Sunflower Electric Power Corporation ("Sunflower") and ITC Great Plains, LLC ("ITC"), with SPP as Signatory

On October 27, 2014, SPP filed a Transmission Interconnection Agreement between Sunflower Electric Power Corporation and ITC Great Plains, LLC, with SPP as signatory. SPP Service Agreement No. First Revised 2403.

An effective date of the date of acceptance by the Commission was requested.

On October 31, 2014, ITC Great Plains, LLC filed a Motion to Intervene.

ER15-206

Generator Interconnection Agreement ("GIA") between Cottonwood Wind Project, LLC ("Cottonwood") as Interconnection Customer and Nebraska Public Power District ("NPPD") as Transmission Owner

Regulatory Status Report

On October 28, 2014, SPP submitted an executed GIA between SPP as Transmission Provider, Cottonwood Wind Project, LLC as Interconnection Customer, and Nebraska Public Power District as Transmission Owner. SPP Service Agreement No. Third Revised 2252.

An effective date of October 14, 2014 was requested.

On October 29, 2014, NextEra Energy Resources, LLC filed a Motion to Intervene.

ER15-211

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Nemaha-Marshall Electric Cooperative ("Nemaha-Marshall") as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner

On October 29, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, Nemaha-Marshall Electric Cooperative as Network Customer, as well as a NOA with Westar Energy, Inc as Host Transmission Owner. SPP Service Agreement No. Fifth Revised 1977.

An effective date of August 1, 2014 was requested.

ER15-212

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Kansas Municipal Energy Agency ("KMEA") as Network Customer, and Midwest Energy, Inc. ("Midwest") and Westar Energy, Inc. ("Westar") as Host Transmission Owners

On October 29, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, Kansas Municipal Energy Agency as Network Customer, as well as a NOA with Midwest Energy, Inc. and Westar Energy, Inc. as Host Transmission Owners. SPP Service Agreement No. First Revised 2900.

An effective date of August 1, 2014 was requested.

ER15-228

Generator Interconnection Agreement ("GIA") between Rattlesnake Creek Wind Project, LLC ("Rattlesnake") as Interconnection Customer and Nebraska Public Power District ("NPPD") as Transmission Owner

On October 29, 2014, SPP submitted an executed GIA between SPP as Transmission Provider, Rattlesnake Creek Wind Project, LLC as Interconnection Customer, and Nebraska Public Power District as Transmission Owner. SPP Service Agreement No. Substitute Original 2880.

An effective date of April 9, 2014 was requested.

ER15-232

Network Integration Transmission Service Agreement ("NITSA") and Network Operating Agreement ("NOA") between SPP, Kansas Municipal Energy Agency ("KMEA") as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner

On October 29, 2014, SPP submitted an executed NITSA between SPP as Transmission Provider, Kansas Municipal Energy Agency as Network Customer, as well as a NOA with Westar Energy, Inc. as Host Transmission Owner. SPP Service Agreement No. Third Revised 2415.

An effective date of August 1, 2014 was requested.

ER15-279

Submission of Tariff Revisions to Implement a Stated Rate to Accommodate Recovery of the Annual Transmission Revenue Requirements ("ATRR") for The Central Nebraska Public Power & Irrigation District ("Central")

On October 31, 2014, SPP submitted tariff revisions to implement a stated rate to accommodate the recovery of the Annual Transmission Revenue Requirements for SPP Member The Central Nebraska Public Power and Irrigation District to be included in the Nebraska Public Power District Zone 17 pricing under the Tariff. Central is a Transmission Owner and Transmission Using Member of SPP and has transferred functional control of only certain of its transmission facilities to SPP for purposes of rate recovery under the Tariff.

An effective date of January 1, 2015 was requested.

ER15-307

Submission of Tariff Revisions to Stipulate that Base Plan Upgrades Approved for Construction After June 19, 2010 Shall be Considered in the Three-Year Review of the Highway/Byway Cost Allocation Methodology Pursuant to Section III.D of Attachment J

On October 31, 2014, SPP submitted tariff revisions to stipulate that Base Plan Upgrades approved for construction after June 19, 2010 shall be considered in the three-year review of Highway/Byway cost allocation methodology pursuant to Section III.D of Attachment J. Such clarification is necessary to allow SPP's review of the Highway/Byway cost allocation methodology to remain consistent with SPP's intent in light of SPP's implementation of Order No. 1000 processes for regional planning.

An effective date of January 1, 2015 was requested.

RM05-5

Standards for Business Practices and Communication Protocols for Public Utilities

On October 3, 2014, FERC issued an Errata Notice correcting text of the incorporated standards listed in Order No. 676-H.

On October 20, 2014, the New York Independent System Operator, Inc. filed a Request for Rehearing of Order No. 676-H. NYISO asked that the Commission reverse its unexplained rejection of the ISO/RTO Council's request that Transmission Providers be given 24 months to come into compliance with the new Public Key Infrastructure standards in WEQ-012 of the newly accepted WEQ Version 003 standards.

On October 20, 2014, the Edison Electric Institute filed a Request for Clarification or, in the Alternative, Request for Rehearing of certain aspects of Order No. 676-H.

RM10-17

Demand Response Compensation in Organized Wholesale Energy Markets

On October 20, 2014, the U.S. Court of Appeals issued an order granting FERC's motion to stay issuance of mandate. The Clerk was directed to withhold the mandate through December 16, 2014.

On October 22, 2014, the NRG Companies filed a Motion on Remand of EPSCA v. FERC and Comments in Opposition on Complaint. The NRG Companies stated that they urge the Commission to promptly respond to the Electric Power Supply Association v. FERC, Case No. 11-1486 decision, and the related Complaint filed by FirstEnergy Services Company against PJM Interconnection, L.L.C., on May 23, 2014, and amended September 9, 2014.

Regulatory Status Report

RM14-1 Reliability Standard for Geomagnetic Disturbance Operations (Order No. 797)

On October 16, 2014, FERC issued Order No. 797-A, Order Denying Rehearing of Order No. 797 issued on June 19, 2014.

RM14-2 Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities

On October 15, 2014, FERC issued a Notice of Filing. On September 29, 2014, the North American Electric Standards Board filed a report with the Commission describing modifications to the NAESB Wholesale Gas Quadrant (WEQ) Business Practice Standards that were adopted in response to the NOPR issued on March 20, 2014 to support the coordination of gas and electric industry scheduling processes. Comments are due by November 28, 2014.

Regulatory Status Report

FERC or State Jurisdiction: State of Arkansas

12-008-U

In the Matter of Southwestern Electric Power Company's Petition for a Declaratory Order Finding that Installation of Environmental Controls at the Flint Creek Power Plant is in the Public Interest

SWEPCO continues to file the Monthly Report of Independent Monitor concerning the Flint Creek Power Plant environmental retrofit project pursuant to the requirements of Order No. 14.

FERC or State Jurisdiction: State of Kansas

14-SPPE-563-SHO

In the Matter of the General Investigation of Southwest Power Pool, Inc. to Show Cause Why the Costs Associated With the Proposed Membership of Western Area Power Administration - Upper Great Plains Region, Basin Electric Power Cooperative, and Heartland Consumers Power District ("Integrated System") are in the Public Interest of Kansas Electric Retail Customers

On October 6, 2014, Staff filed its Report and Recommendation.

Staff recommended that the Commission:

- 1) close this proceeding and defer any determinations regarding the public interest of Kansas electric retail customers related to Integrated System membership in SPP until after orders are issued in FERC Docket Nos. ER14-2850 and ER14-2851;
- 2) file interventions and protests in the FERC dockets;
- 3) consider initiating a future docket investigating the potential value of requiring annual reports by SPP addressing benefits to Kansas utilities afforded by continued SPP membership; and
- 4) consider initiating a future docket investigating the potential value of requiring annual reports by regulated Kansas SPP member Transmission Owners addressing utility specific benefits to each utility's retail ratepayers afforded by continued SPP membership.

On October 7, 2014, the KCC issued an Order Closing Docket.

The Commission concluded that a general investigation docket shall be opened for the limited purpose of investigating whether annual or periodic reporting by the Commission and Kansas utilities that participate in SPP is in the public interest.

The Commission closed this docket and deferred the determination regarding the public interest of Kansas electric retail customers related to the Integrated System membership in SPP until after orders are issued by FERC in Docket Nos. ER14-2850 and ER14-2851.

Regulatory Status Report

FERC or State Jurisdiction: State of LA - New Orleans

UD-11-01

Initiating Investigation of the Potential Costs and Benefits of Entergy New Orleans, Inc. and Entergy Louisiana, LLC Joining a Regional Transmission Organization Versus the Continuation of the Entergy Independent Coordinator of Transmission with Enhancements

On October 1, 2014, Charles Rice, Jr. submitted Supplemental Direct Testimony on behalf of Entergy New Orleans, Inc.

FERC or State Jurisdiction: State of Louisiana

R-33253 Rulemaking Docket Regarding the United States Environmental Protection Agency's ("EPA") Proposed Rule on Carbon Dioxide Emissions from Existing Fossil-Fuel Fired Electric Generating Units under Section 111(d) of the Clean Air Act

On October 2, 2014, the Midcontinent Independent System Operator, Inc. submitted a copy of its analysis on the Clean Power Plan.

Certain parties filed Reply Comments in response to Comments filed on August 25, 2014.

On October 14, 2014, SPP submitted Comments attaching its comments filed at the EPA, as well as a copy of SPP's reliability impact assessment of the proposed rule.

U-32675 Joint Application of Entergy Louisiana, LLC and Entergy Gulf States Louisiana, L.L.C. (Collectively "Entergy") Regarding Transfer of Functional Control of Certain Transmission Assets to the Midwest Independent Transmission System Operator, Inc. ("MISO") Regional Transmission Organization, for an Accounting Order Deferring Related Implementation Costs and Request for Timely Treatment

On October 6, 2014, LPSC Staff filed a Report of July 29, 2014 Technical Conference Regarding MISO.

On October 16, 2014, the LPSC issued a Notice of Technical Conference to be held on November 14, 2014 to discuss issues related to integration by Entergy, Cleco Power LLC and other entities that have opted to participate in the Midcontinent Independent System Operator, Inc.

Regulatory Status Report

FERC or State Jurisdiction: State of Missouri

EW-2012-0065

In the Matter of an Investigation of the Cost to Missouri's Electric Utilities Resulting from Compliance with Federal Environmental Regulations (Environmental Protection Agency or "EPA")

On October 13, 2014, SPP filed Supplemental Responsive Comments attaching its comments filed at the EPA, as well as a copy of SPP's reliability impact assessment of the proposed rule.

Regulatory Status Report

FERC or State Jurisdiction: State of Texas

42636

Commission Comments on Proposed EPA Rule on Greenhouse Gas Emissions for Existing Generating Units

On October 14, 2014, SPP submitted a copy of the comments filed at the EPA on October 9, 2014, as well as a copy of SPP's reliability impact assessment of the proposed rule.

Regulatory Status Report

FERC or State Jurisdiction: U.S. Environmental Protection Agency

EPA-HQ-OAR-2013-0602 Environmental Protection Agency's ("EPA") Proposed Rule Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units ("Clean Power Plan" or "CPP")

On October 9, 2014, SPP submitted comments on the proposed rule on "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units."