



SPP Revision Request Process

October 13, 2020

Market Operations and Policy Committee



Revision History

Version Number	Author	Change Description
1.0	Market Design, Erin Cathey	Initial Draft
2.0	Erin Cathey	Process updates for clarity, grammatical updates, removal of BOD as required approver for changes to RR Process, additions to Qualified Entity definition, removal of timing to appeal MOPC decision to BOD
3.0	Erin Cathey	Updating to include Criteria split to Operating and Planning Protocols
4.0	Erin Cathey	Grammatical revisions, clarifying revisions, updates to actions allowed by Primary Working Groups, Secondary Working Groups, MOPC and BOD, added RR submission timeline, added comment submission timeline, added language to more clearly prescribe hand-offs and responsibilities, added section to define table/postpone
5.0	Aaron Shipley	<p>Adding Project Cost Working Group as a Primary Working Group</p> <p>Adding Economic Studies Working Group as a Primary Working Group</p> <p>Adding the following documents to the Revision Request Process: The Minimum Transmission Design Standards for Competitive Upgrades; Revision Request Process; and ITP Manual</p> <p>Adding the following documents to the RR Process to be effective once approved by Primary Working Group and subject to MOPC appeal process: Reliability Coordinator and Balancing Authority Data Specifications (“RDS”), SPP Communications Protocols</p>
6.0	Chris Cranford	<p>Making updates as approved in RR291.</p> <p>Removing multiple references to applicable documents and replacing with single reference at the beginning of the document.</p>

		Impact Analysis change to allow normal status RRs to move forward to Secondary Working Group when approved by Primary Working Group.
7.0	Aaron Shipley	Updates per RR351 not requiring MOPC approval for RR withdrawals
8.0	Aaron Shipley	Adding section to document the purpose and requirements of the RR Master List. These updates include messaging requirements to be consistent with other approval/update actions in the process.

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SPP Revision Request Process

A request to make additions, deletions, or changes to the selected SPP documents and, unless noted their attachments, is governed by the SPP Revision Request Process outlined in this document. Any such changes are generally referred to as a Revision Request (“Revision Request” or “RR”). The SPP documents subject to this procedure will be referred to as the “SPP Revision Request Documents”. The SPP Revision Request Documents are as follows:

- SPP Tariff
- SPP Operating Criteria
- SPP Planning Criteria
- SPP Market Protocols, Except for Appendix F Settlement examples which may be updated by SPP Staff as necessary
- SPP Business Practices
- SPP Minimum Transmission Design Standards for Competitive Upgrades (“MTDS”)
- SPP Integrated Planning Manual (“ITP Manual”)
- SPP Revision Request Process

Revision Requests to these documents will be presented to the SPP Working Groups as outlined in the Revision Request Routing Criteria, which can be found on spp.org.

This section lists the documents that have been placed under the Revision Request Process to facilitate changes, which are effective upon approval by the designated Primary Working Group and only subject to being appealed to MOPC. Such changes will be effective immediately upon approval by the Primary Working Group. Documents subject to this waiver are:

- Reliability Coordinator and Balancing Authority Data Specifications (“RDS”)
- SPP Communications Protocols

Submission of a Revision Request

The following Qualified Entities may submit an RR:

- Any Market Participant;
- Transmission Customers or other entities that are parties to transactions under the Tariff;
- Any Entity that is an SPP Member;
- Any staff member of a governmental authority having jurisdiction over the SPP or any member company;
- SPP Staff;

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- SPP Market Monitor;
- Any rostered individual of an official SPP Committee, Task Force or Working Group;
- Any entity designated by a Qualified Entity to submit a Revision Request “on their behalf”.
Revision Request Procedure

A description of the process is provided in the following subsections.

Review and Posting of Revision Requests

Revision Requests (RRs) shall be submitted to SPP by completing a Revision Request Submission Form, provided at the SPP website ([RR Request/Comment Forms](#)). All RRs, except those submitted by SPP staff, are to be submitted to the SPP Request Management System (RMS). Any RRs not submitted appropriately will not be processed.

The RR shall include at least the following information:

- (1) Identification of the Submitter;
- (2) Primary SPP Revision Request Document requiring revision with a list of affected section numbers and an indication of affected documents, e.g., SPP Business Practices, SPP Operating Criteria, SPP Planning Criteria, SPP Market Protocols, ITP Manual, MTDS or SPP Open Access Transmission Tariff;
- (3) Complete and sufficient objective of the suggested change. Summary of the problem(s), proposed solution(s), and benefit(s) expected to be realized by the RR;
- (4) Proposed language changes (redlined).

SPP shall evaluate the RR for completeness and shall notify the submitter, within three (3) business days of receipt if the RR is incomplete, including the reasons for such status. SPP may provide information and assistance to the submitter to ensure it is complete. A submitter must submit a complete version of the RR with all deficiencies corrected in order for the revision to be considered. An incomplete RR will not be processed.

Revision Requests must be submitted no less than eighteen (18) business days prior to the Primary Working Group’s initial review. Upon receipt of a complete RR, SPP shall post the complete RR to the SPP website and distribute the RR to the SPP Revision Request email exploder and the Primary Working Group email exploder within three (3) business days.

The “Primary Working Group” shall mean the SPP working group responsible for the primary document being revised.

Primary Working Group governing document responsibility is as follows:

- The Market Working Group is responsible for approving and rejecting any proposed changes to the Market Protocols.
- The Operating Reliability Working Group is responsible for approving and rejecting any proposed changes to the SPP Operating Criteria.

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- The Transmission Working Group is responsible for approving and rejecting any proposed changes to the SPP Planning Criteria and ITP Manual.
- The Regional Tariff Working Group is responsible for approving and rejecting any proposed changes to the SPP Tariff.
- The Business Practices Working Group is responsible for approving and rejecting any proposed changes to the SPP Business Practices.
- The Project Cost Working Group is responsible for approving and rejecting any proposed changes to the Minimum Transmission Design Standards for Competitive Upgrades.
- The Economic Studies Working Group is responsible for approving and rejecting any proposed changes to the ITP Manual.

The “Secondary Working Group” shall mean the SPP Working Group(s) responsible for documents or sections therein that may be impacted by the RR. Secondary Working Groups have a secondary approval responsibility, however any changes made by a Secondary Working Group must be accepted by the Primary Working Group prior to the MOPC and, where appropriate, the BOD review and approval.

Routing Criteria for a Revision Request

Revision Requests upon submission to the RMS shall be routed to the appropriate internal SPP department. The Primary Staff Secretary will assign an RR number and route the RR to the appropriate Primary and Secondary Working Group(s) according to the [RR Routing Criteria](#) and internal SPP review.

Written Comments on a Revision Request

Any interested entity may submit official comments on an RR in writing. All RR comments must be submitted using the Revision Request Comment Form provided on the SPP website. Comments on RRs, except those submitted by SPP staff, should be submitted to the SPP Request Management System (RMS). Comments may be submitted at any time prior to the MOPC review. However, comments for initial Primary Working Group review must be submitted no later than five (5) business days prior to the initial Primary Working Group’s scheduled review. SPP shall evaluate the RR Comment Form for completeness and shall notify the submitter, within three (3) business days of receipt if the RR Comment Form is incomplete, including the reasons for such status. SPP may provide assistance to the submitter to ensure it is complete.

All complete comments received in the proper format will be posted to the SPP website within three (3) business days of receipt and distributed to the SPP Revision Request Email Exploder and the Primary Working Group Email Exploder. The comments shall include identification of the commenting entity. Any comments not submitted appropriately will not be processed.

Impact Analysis

SPP shall perform an Impact Analysis (IA) or indicate one is not necessary. The results of the evaluation will be documented on an IA form and posted in the applicable RR folder for review.

A Revision Request IA should assess the impact of the proposed RR on SPP systems, processes, and SPP staffing needs, and shall contain the following information:

- (1) An estimate of any cost and budgetary impacts to SPP for both implementation and on-going operations;
- (2) The estimated amount of time required to implement the revised language;
- (3) The identification of alternatives to the original proposed language that may result in more efficient implementation; and
- (4) The identification of any manual workarounds that may be used as an interim solution and estimated costs of the workaround;
- (5) Primary Working Group rank for any RRs requiring a system, process and/or staffing change; and
- (6) A list of possible SPP and Member systems impacted.

It will be at the discretion of the Primary Working Group to review and/or take action on an RR contingent upon review of a completed IA. Upon completion of the IA, the Primary Working Group may review actions taken on an RR prior to the completion of the IA and take additional action if necessary.

If the Primary Working Group approves an RR contingent upon review of an IA, SPP shall prepare an IA based on the RR Recommendation Report. A RR may be submitted for review by Secondary Working Groups while the IA is being completed. Unless a longer review period is warranted due to the complexity of the proposed RR Recommendation Report or the quantity of approved RRs, SPP shall issue the IA for the recommended RR within thirty (30) calendar days after the Primary Working Group approval of the RR. SPP shall post the results of the completed IA on the SPP website. If a longer review period is required for SPP staff to complete a full IA, SPP staff shall submit a schedule for completion of the IA to the Primary Working Group chair.

Primary Working Group Review and Action

The Primary Working Group will review timely submitted RRs during the next regularly scheduled meeting or as otherwise directed by the RR submitter. In the event an RR is submitted less than eighteen (18) business days prior to the Primary Working Group's review, the RR may be expedited following the guidelines for expediting RRs or reviewed at the next regularly scheduled Primary Working Group meeting.

Primary Working Group approved RRs will be routed through the appropriate Secondary Working Group(s), the MOPC and, when required, the BOD for review. The Primary Working Group reserves the right to recommend action to the MOPC at any time subsequent to its initial action on an RR.

The Primary Working Group may take action on an RR to:

- (1) Approve as submitted or modified. Approval may be subject to review of a IA or updated IA if such review is determined by the Primary Working Group to be necessary;
- (2) Reject. An RR shall be considered rejected if a majority of the Primary Working Group members fail to reject or approve the RR, either as submitted or modified;
- (3) Table/Postpone. To table or postpone an RR is to defer action pending some follow-up action. RRs approved by the Primary Working Group may not be tabled/postponed except by MOPC or BOD. The Primary Working Group may recommend to table/postpone a previously approved RR at any time prior to the MOPC scheduled review of the RR;
- (4) Withdrawal. The Primary Working Group may take action to withdraw a previously approved RR at any time prior to any action taken by the MOPC. See section “Withdrawal of a Revision Request” for further detail.; or
- (5) Refer the RR to another working group, committee, or task force as it deems appropriate. The RR may be referred to a task force created by the Primary Working Group and/or to one or more existing working groups or task forces of the MOPC for review and comment on the RR. Suggested modifications to an RR should be submitted as comments by the chair, or the chair’s designee, on behalf of the working group, committee, or task force for consideration by the Primary Working Group. The Primary Working Group shall retain ultimate responsibility for processing RRs related to its respective document.

Within three (3) business days after the Primary Working Group takes action, SPP shall post an RR Recommendation Report to the SPP website reflecting the Primary Working Group’s action. The Primary Working Group staff secretary shall notify Secondary Working Group staff secretaries of the posting of RR Recommendation Report and applicable IAs. An RR Recommendation Report shall contain at least the following items:

- (1) Identification of submitter;
- (2) Modified SPP Revision Request Document language proposed by the Primary Working Group;
- (3) Estimated system cost and duration if applicable;
- (4) Comments submitted;
- (5) Voting record for the Primary Working Group, Secondary Working Groups, MOPC, BOD and RSC if applicable;
- (6) Primary Working Group rank for any RRs requiring a system, process and/or SPP staff change; and
- (7) Recommended action for the MOPC from the Primary Working Group.

The Primary Working Group Chair shall provide to the MOPC RRs recommended to be approved, or tabled/postponed. For informational purposes, the Primary Working Group Chair shall provide to the MOPC any RRs that were approved for withdrawal or were rejected by the Primary Working Group. Should any Qualified Entity disagree with an action taken or recommended by the Primary Working Group, such Qualified Entity may submit an alternate recommendation to the RMS using the RR Comment

Form or such Qualified Entity may, in writing, appeal and submit an alternate recommendation to the MOPC. The appealing Qualified Entity shall send an email detailing the appeal to both the Primary Working Group and the MOPC staff secretaries.

Secondary Working Group Review and Action

A final version of the RR Recommendation Report will be submitted for posting in the background materials seven (7) calendar days prior to the Secondary Working Group(s) next meeting. However, at the discretion of the Secondary Working Group, a waiver may be granted of the seven (7) calendar day rule. The Secondary Working Group(s) shall review the recommended changes to determine if the proposed changes conflict with requirements outlined in the applicable SPP Revision Request Document being modified. In the event the Secondary Working Group(s) identifies conflicts, which have not previously been identified by the Primary Working Group, or issues regarding the proposed changes, the Secondary Working Group(s) will submit comments, using the RR Comment Form, to be considered by the Primary Working Group at its next regularly scheduled meeting, or by the MOPC and, where appropriate, the BOD. All submitted comments will be recorded in the RR Recommendation Report for working group, MOPC and, where appropriate, BOD consideration.

The Secondary Working Group may take action on the RR to:

- (1) Approve as submitted or modified. If modified the Secondary Working Group must submit comments with the modified language to the Primary Working Group within 3 business days; or
- (2) Reject. An RR shall be considered rejected if a majority of the Secondary Working Group members fail to reject or approve the RR as submitted or modified. The RR will move forward with the Secondary Working Group's rejection noted in the RR Recommendation Report;

The Primary Working Group must review and approve changes made by Secondary Working Groups. It is the responsibility of the Primary Working Group staff secretary to ensure RRs are appropriately routed through necessary Secondary Working Groups and to recommend action to the MOPC. Where an RR impacts multiple primary documents, the Primary Working Group shall be assigned based on which document has the most material impact or at the discretion of the impacted working group chairs.

All decisions of the Primary Working Group, the Secondary Working Group(s), the MOPC and the BOD with respect to any RR shall be posted to the SPP website within three (3) business days of the date of the decision. All such postings shall be maintained on the SPP website in the Open Revision Request folder until the RR is closed. An RR is considered closed if it has been implemented in the applicable SPP Revision Request Document, rejected, or withdrawn, or all relevant system or process changes are complete. Closed Revision Requests shall be maintained on the SPP website in the Closed Revision Request folder.

Should any Qualified Entity disagree on an action taken or recommended by the Secondary Working Group, such Qualified Entity may submit an alternate recommendation to the RMS using the RR Comment Form or such Qualified Entity may, in writing, appeal and submit an alternate recommendation to the MOPC. The appealing Qualified Entity shall send an email detailing the appeal to both the Primary Working Group and the MOPC staff secretaries.

Market and Operations Policy Committee Action

The MOPC shall consider RRs submitted by the Primary Working Group, for which an RR Recommendation Report has been posted on the SPP website for at least six (6) days, or those accepted for urgent treatment by the MOPC. The following information must be included for each RR considered by the MOPC:

- (1) The RR Recommendation Report and IA, if any; and
- (2) Any comments timely received in response to the RR Recommendation Report.

The MOPC shall take one of the following actions regarding the RR Recommendation Report:

- (1) Approve as recommended in the RR Recommendation Report or as modified by the MOPC;
- (2) Reject. An RR shall be considered rejected if the MOPC fails to reject or approve the RR Recommendation Report;
- (3) Table/Postpone. To table or postpone an RR is to defer action pending some follow-up action needed. In the event a tabled or postponed RR's deferral period requires additional time than originally approved by the MOPC, the Primary Working Group chair shall recommend a longer deferral period to the MOPC at their next regularly scheduled meeting;
- (4) Withdraw. The MOPC may vote to withdraw a previously approved RR; or
- (5) Remand the RR to the Primary Working Group with instructions.

The MOPC's decision regarding approval or rejection of an RR shall be posted on the SPP website with the MOPC's minutes and in the recommendation to the BOD. Should any Qualified Entity want to appeal an action taken or recommended by the MOPC, such Qualified Entity may, in writing, submit comments within three (3) business days of the posting to the MOPC staff secretary for inclusion in the BOD recommendation.

If the MOPC approves a change or changes to any SPP Revision Request Documents subject to the RR Process, such change(s) shall be incorporated into the appropriate document and posted on the SPP website as soon as practicable, but no later than one (1) day before the effective date of the changes. Within (3) business days following each MOPC meeting, a notice of action results taken by the MOPC for RRs will be sent to the Revision Request Email Exploder.

SPP Board of Directors Review and Action

If the RR requires SPP Operating Criteria, SPP Planning Criteria or SPP Tariff revisions, after an RR has been approved by the MOPC, it must be submitted to the SPP Board of Directors (BOD) for review and action. The BOD will review the RR at the next regularly scheduled meeting and take one of the following actions:

- (1) Approve the RR as recommended in the RR Recommendation Report or as modified by the SPP BOD;
- (2) Reject if the SPP BOD fail to reject or approve the RR as submitted or modified;

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- (3) **Table/Postpone.** To table or postpone an RR is to defer action pending some follow-up action needed;
- (4) **Withdraw.** The BOD may vote to withdraw a previously approved RR; or
- (5) **Remand the RR to the MOPC with instructions.**

If the BOD approves a change or changes to any SPP Revision Request Documents subject to the RR Process, such change(s) shall be incorporated into the appropriate document and posted on the SPP website as soon as practicable, but no later than one (1) day before the effective date of the changes. Within (3) business days following each BOD meeting, a notice of action results taken by the BOD for RRs will be sent to the Revision Request Email Explorer.

Tabling or Postponing a Revision Request

To table or postpone an RR is to defer action pending some follow-up action. A Primary Working Group may recommend to the MOPC that an RR be tabled or postponed. In the event a tabled or postponed RR deferral period requires additional time than originally approved by the MOPC, the Primary Working Group chair shall recommend a longer deferral period to the MOPC at their next regularly scheduled meeting.

Withdrawal of an Revision Request

Submitter Withdrawal

Upon notice to the Primary Working Group, the RR submitter may withdraw the RR at any time prior to approval of the RR by the Primary Working Group. The Primary Staff Secretary shall create a RR Recommendation Report recording the submitter's withdrawal of a RR and post on the SPP website within three (3) business days of the submitter's notice to the Primary Working Group.

Primary Working Group Withdrawal

Upon notice to the RR submitter and any Secondary Working Group having taken a prior action on an RR, a Primary Working Group may take action to withdraw a previously approved RR at any time prior to any action taken by the MOPC. A Qualified Entity may appeal this action directly to the MOPC. Absent any appeals, the RR will be considered withdrawn and an updated RR Recommendation Report reflecting the status will be posted to spp.org.

Expedited Review Requests

The party submitting an RR may request that the RR be considered for expedited review when the submitter is requesting action from the Primary Working Group on an RR that has not met the minimum comment period.

A valid motion in a regularly scheduled meeting of the Primary Working Group is required to waive the minimum comment period and treat an RR with expedited review status. If approved for expedited review by the Primary Working Group, the RR will be treated the same as one that has met the minimum comment period. If the request for expedited review is rejected, the RR will be considered by the Primary Working

Group after the minimum period; in most cases at the next regularly scheduled Primary Working Group meeting.

Urgent Action Requests

The party submitting an RR may request that the RR be considered for urgent action. Urgent action requests should be reserved for instances when existing applicable SPP Revision Request Document language is impairing or could imminently impair SPP system reliability or wholesale or retail market operations, or is causing or could imminently cause a discrepancy between any of SPP's governing documents.

The Primary Working Group shall consider the urgent action RR at its earliest regularly scheduled meeting or at a special meeting called by the Primary Working Group chair. In some cases, an Urgent Action Request will occur concurrently with an expedited review request. A valid motion and vote of the Primary Working Group are required to designate the RR for urgent action. After approval, Urgent Action RRs shall be given priority high enough to ensure implementation within the timeline necessary to mitigate concerns about SPP system reliability or market operations under the unmodified language, or any other significant issues identified in the RR.

If approved, SPP shall submit an urgent action RR Recommendation Report to the chair and staff secretary of the MOPC and the appropriate Secondary Working Groups within two (2) business days to address the urgency of the RR. The MOPC and Secondary Working Groups chairs may request action from the working groups to address the urgency of the RR.

Appeal of Decision

If the Primary Working Group rejects or withdraws an RR, any Qualified Entity eligible to submit an RR may appeal directly to the MOPC. Notice of the appeal must be submitted to SPP within ten (10) business days after the date of the relevant decision. Appeals to the MOPC shall be posted on the SPP website within three (3) business days of receipt and placed on the agenda of the next regularly scheduled MOPC meeting, provided that the appeal is received in time to meet the MOPC meeting material posting deadline of seven (7) days prior to the meeting

Should any Qualified Entity want to appeal an action taken or recommended by the MOPC, such Qualified Entity may, in writing, submit comments within three (3) business days to the MOPC staff secretary for inclusion in the BOD recommendation.

FERC Filings

In the event the FERC rejects the SPP Tariff modifications associated with an RR, the RR will be deemed rejected by the FERC action. In the event the FERC conditionally accepts with compliance requirements the SPP Tariff modifications associated with an RR, SPP staff will prepare a new RR to conform the appropriate document(s) to the FERC order. Within (3) business days following receipt of a FERC order to an RR, a notice will be sent to the Revision Request Email Exploder noting the FERC docket number and summary of the FERC actions.

Revision Request Master List

The RR Master List is an inventory of all RRs that includes pertinent data to each RR. This is a public list maintained solely by SPP Staff. The RR Master List shall contain information including, but not limited to:

- 1) RR Number
- 2) RR Title
- 3) RR Submitter Information
- 4) RR Submittal Date
- 5) Primary Working Group
- 6) Impacted Governing Documents
- 7) Timing Status (Normal, Expedited, Urgent)
- 8) Impact Assessment Information
- 9) Posting & Comment Dates
- 10) SPP Working Group Work Flow (review date and results)
- 11) Anticipated Filing Dates
- 12) FERC Data if applicable (Filing Date, Docket Number, FERC Ruling, Effective Dates)
- 13) Anticipated Implementation Dates and Status

It is the responsibility of SPP Staff to maintain the RR Master List. Once a RR has been approved for official posting, SPP Staff shall add it to the RR Master List and complete the table with all known information at the time of posting. As the RR progresses through the SPP Stakeholder Process and until such time the RR is moved to “Closed” status, any updates or modifications to data on the Master List shall be updated within three (3) business days of such change. Following SPP Stakeholder Process approval, if the RR requires a FERC filing and/or Implementation Processes, information related to these items on the RR Master List shall continue to be maintained by SPP Staff and updated accordingly within three (3) business days of any change. A notice shall be sent to the Revision Request Email Exploder within (3) business days when an RR has been implemented.