

March 19, 2015

VIA ELECTRONIC FILING

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

Re: *Southwest Power Pool, Inc.*, Docket No. ER15-____-000
Submission of Tariff Revisions to Clarify Certification as a Regulation
Qualified Resource in the Integrated Marketplace

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act, 16 U.S.C. 824d (“FPA”), and Section 35.13 of the Federal Energy Regulatory Commission’s (“Commission”) Regulations, 18 C.F.R. § 35.13, Southwest Power Pool, Inc. (“SPP”) submits revisions to its Open Access Transmission Tariff (“Tariff”)¹ to include terms and conditions in Attachment AE² in order to provide the means for a generation resource that is not currently registered in the Integrated Marketplace, and is in the process of registration, to either self-certify as a Regulation Qualified Resource³, Regulation-Up Qualified

¹ Southwest Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1.

² Attachment AE of the Tariff contains the terms and conditions to the Integrated Marketplace. Capitalized terms not otherwise defined in this letter shall have the meaning ascribed by the Tariff.

³ See Tariff at Attachment AE, Section 1.1, Definitions R. Regulation Qualified Resource is defined as “[a] Resource that has met the requirements to be eligible to submit Regulation-Up Offers and Regulation-Down Offers into the Energy and Operating Reserve Markets.”

Resource⁴ or Regulation-Down Qualified Resource⁵ approved for dispatch within the Integrated Marketplace or request SPP to administer testing as an alternative to self-testing. Additionally, the Tariff revisions being proposed *infra* will clarify the current existing Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource re-certification requirements for resources currently registered in the Integrated Marketplace or when the Market Participant requests SPP to administer the re-certification testing.

SPP requests an effective date of May 19, 2015 for the proposed Tariff revisions.

I. BACKGROUND

A. SPP

SPP is a Commission-approved Regional Transmission Organization (“RTO”).⁶ It is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP has 83 Members, including 14 investor-owned utilities, 11 municipal systems, 14 generation and transmission cooperatives, 8 state agencies, 12 independent power producers, 12 power marketers, 11 independent transmission companies and 1 federal agency. As an RTO, SPP administers open access Transmission Service over approximately 48,930 miles of transmission lines covering portions of Arkansas, Kansas, Louisiana, Missouri, Nebraska, New Mexico,

⁴ See Tariff at Attachment AE, Section 1.1, Definitions R. Regulation-Up Qualified Resource is “[a] Resource that has met the requirements to be eligible to submit Regulation-Up Offers into the Energy and Operating Reserve Markets.” Regulation-Up is “[a]n Operating Reserve product procured by the Transmission Provider from qualified Resources that increase their energy output (or reduce consumption of the Demand Response Load associated with a qualified Dispatchable Demand Response Resource) in response to a Regulation Deployment instruction from the Transmission Provider.”

⁵ See Tariff at Attachment AE, Section 1.1, Definitions R. Regulation-Down Qualified Resource is “[a] Resource that has met the requirements to be eligible to submit Regulation-Down Offers into the Energy and Operating Reserve Markets.” Regulation-Down is “[a]n Operating Reserve product procured by the Transmission Provider from qualified Resources that reduce their energy output (or increase consumption of the Demand Response Load associated with a qualified Dispatchable Demand Response Resource) in response to a Regulation Deployment instruction from the Transmission Provider.”

⁶ *Southwest Power Pool, Inc.*, 109 FERC ¶ 61,009 (2004), *order on reh’g*, 110 FERC ¶ 61,137 (2005).

Oklahoma, and Texas, across the facilities of SPP's Transmission Owners;⁷ and administers the Integrated Marketplace, a centralized day ahead and real-time energy and operating reserve market with locational marginal pricing and market-based congestion management.⁸

B. *Certification as a Regulation Qualified Resources within the Integrated Marketplace*

A Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource is a resource that has met the minimal requirements to be eligible to submit offers into the Integrated Marketplace.⁹ The requirements that a resource must meet to become a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource are contained in Section 2.10.3 of Attachment AE of the Tariff. To become a Regulation Qualified Resource, Regulation-Up Qualified Resources, or Regulation-Down Qualified Resources, the resource must pass the specific regulation tests defined in Section 2.10.3 of Attachment AE. The requirements of Section 2.10.3 provide that the resource must be 100% deployable in the Integrated Marketplace if cleared for a continuous duration of sixty (60) minutes and shall provide the data required by the Market Protocols.¹⁰

Under the current Tariff, Section 2.10.3 of Attachment AE provides that a resource may become certified only after it achieves three consecutive regulation test scores of seventy-five percent (75%) or above.¹¹ Once a resource achieves certification as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource, the Market Participant must maintain the resources' compliance rating status pursuant to the Market Protocols.¹² SPP may also perform a regulation test on any Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource to verify continued certification.¹³ Section 2.10.3 also provides the terms and conditions whereby SPP may terminate

⁷ See *Sw. Power Pool, Inc.*, 89 FERC ¶ 61,084 (1999); *Sw. Power Pool, Inc.*, 86 FERC ¶ 61,090 (1999); *Sw. Power Pool, Inc.*, 82 FERC ¶ 61,267, *order on reh'g*, 85 FERC ¶ 61,031 (1998).

⁸ *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,130 (2014) (order approving the start-up and operation of the Integrated Marketplace effective March 1, 2014).

⁹ See *supra* n. 3-5.

¹⁰ See Tariff at Attachment AE, Section 2.10.3.

¹¹ *Id.* at (1).

¹² *Id.* at (7).

¹³ *Id.* at (5).

certification of a resource due to persistent failure to follow regulation deployment.¹⁴ A resource may also re-qualify as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource through a re-test.¹⁵

Since the implementation of the Integrated Marketplace SPP has experienced a considerable increase of interest in SPP membership, the fruition of such would constitute a significant expansion of SPP's footprint and the number of Market Participants that may participate in the Integrated Marketplace. For example, SPP is currently in process to integrate three new Transmission Owner's into membership, the Western Area Power Administration – Upper Great Plains Region, Basin Electric Power Cooperative, and Heartland Consumers Power District (the "IS Parties").¹⁶ Each of these new entities will become Market Participants and will bring significant resources into the market. Additionally, SPP is working with additional entities in the geographic areas surrounding the IS Parties, and also those embedded within the IS Parties, and expects multiple new Market Participants as a result of these discussions. With these entities come generation resources that will require testing and certification as Regulation Qualified Resources, Regulation-Up Qualified Resources, or Regulation-Down Qualified Resources.

Currently, the requirements of Section 2.10.3 of Attachment AE to certify a resource as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource do not allow a self-certification option for existing resources wishing to participate in the SPP Integrated Marketplace and who are already regulating in another Balancing Authority or inside other markets. SPP staff determined that a Tariff provision that provided the opportunity for self-certification of regulation qualification may be an efficient means to allow new resources to register and begin participation in the Integrated Marketplace. Additionally, such methodology was needed to facilitate the substantial growth of SPP's market footprint and influx of new Market Participants and their existing resources. To that end, SPP staff developed the initial Tariff revisions being proposed herein. The Tariff revisions include an additional process added to the current process which will allow any potential or new Market Participant that wishes to register an existing resources in the market to self-certify the resource as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource by providing historical data or self-testing.

C. *SPP Stakeholder Process and Approval of Proposed Tariff Revisions*

¹⁴ See Tariff at Attachment AE, Section 2.10.3 at (6).

¹⁵ *Id.*

¹⁶ See generally Docket Nos. ER14-2850 and ER14-2851.

The Tariff revisions proposed in this filing are the result of SPP's stakeholder process and were further developed by SPP staff and approved initially through the Market Working Group ("MWG"). The MWG supported the effort to expand SPP's footprint through the addition of new Market Participants that own resources which are already in commercial operation and are able to regulate upon entry into SPP's Integrated Marketplace. Additionally, SPP staff and stakeholders developed the Tariff revisions proposed herein to provide a streamline process for resources coming in to the Integrated Marketplace that have historical data available sufficient to certify the resource's ability to regulate as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource within the market. The MWG unanimously approved the Market Protocol revisions and endorsed the Tariff modifications at its meeting held on November 18, 2014. Shortly thereafter, the Operating Reliability Working Group ("ORWG") approved the Tariff revisions on December 18, 2014 and the Regional Tariff Working Group ("RTWG") approved the day after the ORWG. On January 13, 2015, the Markets and Operations Policy Committee approved the proposed language and recommended to the SPP Board of Directors that the Tariff revisions be approved. The SPP Board of Directors approved the proposed Tariff revisions for inclusion in the Tariff on January 27, 2015.

II. DESCRIPTION AND JUSTIFICATION FOR TARIFF REVISIONS

A. *Proposed Revisions to Section 2.10.3 of Attachment AE*

The main purpose of the Tariff revisions proposed in this filing is to provide a mechanism and streamlined process for new resources coming into the Integrated Marketplace or non-registered resources that have sufficient historical data or internal testing results to certify as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource. This instant filing will describe the clarifications to the current process before explaining the proposed revisions necessary to effectuate the new methodology for a Market Participant's self-testing of existing Resources.

First, SPP proposes to revise Section 2.10.3 of Attachment AE of the Tariff to clarify the existing rules in the following manner. First, a resource may become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource only after it achieves three regulation test scores of seventy-five percent (75%) or greater.¹⁷ This is not a change from the current process but rather a revision to the vernacular to use more descriptive phraseology (i.e., SPP is merely revising the section to state the test scores must be seventy-five (75) percent or

¹⁷ The calculation of the regulation test score is defined in the Market Protocols Section 6.1.11.3.2. The Market Protocols are posted on SPP's website at: <http://www.spp.org/section.asp?group=215&pageID=27>.

“greater” rather than “above”).¹⁸ Second, SPP is increasing the notification period that a Market Participant self-testing must provide to SPP prior to the commencement of the test. SPP will require one hundred twenty (120) minutes’ notice before the test is scheduled to begin.¹⁹ Increasing the notification period allows each necessary desk within SPP’s operations group (Reliability Unit Commitment, Real-Time Balancing Market, Balancing Authority and Reliability Coordination) sufficient time to review forecast and commitment requirements to ensure testing will not inadvertently cause reliability issues.

SPP also clarifies that it is the ultimate authority to determine whether a regulation test can be performed and reserves the right to control the timing, start time or termination.²⁰ This is not a new power being vested in SPP; rather, SPP is rewording the section to refer to its authority in the testing process with more descriptive and substantively correct wording than the current language which only references SPP’ right to make the final determination. Indeed, SPP as the administrator of the Integrated Marketplace has the final authority over the testing process and the changes reflected here reinforce that position. Fourth, SPP is adding an obligation to itself that SPP will verify test results and provide confirmation of status to the Market Participant within fourteen (14) operating days after the administration of the test or self-test. Finally, SPP retains the right to administer a regulation test on any Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource to verify continued qualification. Finally, SPP provides vernacular changes to existing language to ensure consistency with the changes being proposed herein.

Second, in this filing SPP proposes new terms and conditions be included in Section 2.10.3 of Attachment AE to apply to a resource that is not registered in the Integrated Marketplace as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource but is in the process of registering for this status. The requirements that a resource must meet to self-test are consistent with those applicable to existing Resources registered in the market that want to remain certified. Specifically, SPP proposes that a Market Participant or prospective Market Participant shall either self-test or request SPP to administer testing to the resource seeking qualification as a Regulation Qualified Resource, Regulation-Up Qualified

¹⁸ See Proposed Tariff at Attachment AE, Section 2.10.3. SPP is also removing the requirement that the tests be “consecutive.” Under the “consecutive” requirement, a resource that experiences some issue that prevented completion of its third and final test and issues the process would have to start again beginning with Test #1. To request a Resource to re-do previously successful tests based on a “consecutive” requirement unreasonably prolongs the qualification process.

¹⁹ *Id.*

²⁰ *Id.*

Resource, or Regulation-Down Qualified Resource.²¹ A Market Participant that chooses the self-testing option must make all testing data available to SPP.²² In order to qualify as a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource the resource must achieve three regulation test scores of seventy-five percent (75%) or greater,²³ as calculated pursuant to the Market Protocols.²⁴ Upon satisfaction of the minimal requirements, whether testing is performed by SPP or the Market Participant prior to registration, the resource will become a Regulation-Up Qualified Resource, Regulation-Down Qualified Resource or Regulation Qualified Resource upon entry into the Integrated Marketplace.²⁵

B. *Justification*

From a more universal perspective, the proposed process will provide ongoing to benefit all entities which desire to register and bring its operational resources into the Integrated Marketplace. As a means to streamline the process with which a new Resource must comply to certify for market regulation, the Tariff revisions being proposed herein by SPP brings significant benefits to the public and SPP customers, both existing and potential. Commission acceptance will foster participation in SPP's organized energy and transmission markets to those entities that would like to take advantage of RTO membership or are currently in the registration process. As a result, the process being proposed herein will support SPP's current effort to integrate the IS Parties into SPP membership. Commission acceptance will allow the IS Parties to provide resource self-test data to SPP and certify as a Regulation Qualified Resource, Regulation-Up Qualified Resource, or Regulation-Down Qualified Resource upon the integration date.

As the process will allow all entities that are working through registration to self-test ahead of approval to transact in the Integrated Marketplace, the Tariff revisions being proposed will add efficiency to the registration process. For those Market Participants or potential Market Participants which own operational Resources that have sufficient operational data, the proposed Tariff revisions may provide a shorter pathway to market participation at the discretion of the Market Participant. The option for SPP to certify the Market Participant's Resources are retained and is an available option at the discretion of the Market Participant. Additionally, the clarifications to the current process contained in this filing will increase transparency by what means a

²¹ See Proposed Tariff at Attachment AE, Section 2.10.3.

²² *Id.*

²³ *Id.*

²⁴ See Market Protocols at Section 6.1.11.3.2.

²⁵ See Proposed Tariff at Attachment AE, Section 2.10.3.

Market Participant may continue to maintain its current Regulation Qualified Resources, Regulation-Up Qualified Resources, or Regulation-Down Qualified Resources.

As stated previously, the Tariff revisions proposed by SPP herein are the result of the stakeholder process, and were approved by the SPP Board of Directors. While SPP recognizes that stakeholder approval does not by itself cause a filing to be just and reasonable, SPP requests that the Commission extend appropriate deference to the wishes of SPP's stakeholders, consistent with Commission precedent.²⁶ Further, the addition of this language will provide clarity to the Tariff. For these reasons, SPP requests the Commission to approve the Tariff revisions included in this filing, effective May 19, 2015.

III. EFFECTIVE DATE

SPP requests that the Commission accept the proposed revisions to the Tariff to become effective May 19, 2015, which is not less than 60 days, or more than 120 days prior to, the submission of this filing as required by the Commission.²⁷

IV. ADDITIONAL INFORMATION

A. Documents Submitted with this Filing:

In addition to this transmittal letter, the following documents are included with this filing:

Clean and Redline Tariff revisions under the Sixth Revised Volume No. 1

²⁶ The Commission has previously recognized that provisions approved through RTO stakeholder processes are due deference. *See Sw. Power Pool, Inc.*, 127 FERC ¶ 61,283, at P 33 (2009) (noting that the Commission “accord[s] an appropriate degree of deference to RTO stakeholder processes”); *New Eng. Power Pool*, 105 FERC ¶ 61,300, at P 34 (2003) (Commission approval of transmission cost allocation proposal based upon an extensive and thorough stakeholder process); Policy Statement Regarding Regional Transmission Groups, 1991-1996 FERC Stats. & Regs., Regs. Preambles ¶ 30,976, at 30,872 (1993) (the Commission will afford the appropriate degree of deference to the stakeholder approval process). The Commission’s deference to RTO stakeholder processes has been upheld by the courts. *See Pub. Serv. Comm’n of Wis. v. FERC*, 545 F.3d 1058, 1062-63 (D.C. Cir. 2008) (noting that the Commission often gives weight to RTO proposals that reflect the position of the majority of the RTO’s stakeholders) (quoting *Am.Elec. Power Serv. Corp. v. Midwest Indep. Transmission Sys. Operator, Inc.*, 122 FERC ¶ 61, 083, at P 172 (2008)).

²⁷ *See* 18 C.F.R. § 35.3 at (a) (1).

B. Service:

SPP has electronically served a copy of this filing on all its Members, Customers, and Market Participants. A complete copy of this filing will be posted on the SPP web site, www.spp.org, and is also being served on all affected state commissions.

C. Requisite Agreement:

These revisions to the SPP Tariff do not require any contracts or agreements.

D. Part 35.13 Cost of Service Support

To the extent necessary, SPP requests waiver of any provisions of section 35.13 of the Commission's regulations that may be deemed to require cost support in the form of cost-of-service statements for the enclosed revisions. The enclosed revisions contain the requirements for certification of generation resources for participation in the Integrated Marketplace and have no direct bearing on rates or costs being charged pursuant to the Tariff.

E. Communications

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

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V. CONCLUSION

For all of the foregoing reasons, SPP respectfully requests that the Commission accept the Tariff revisions proposed herein as just and reasonable, with the effective date as discussed above.

Respectfully submitted,

/s/ **Matthew Harward**

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2.10.3 Regulation Qualified Resources

A Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource must pass a specific regulation test as defined below and must be capable of deploying one hundred percent (100%) of cleared Regulation-Up and/or Regulation-Down within the Regulation Response Time for a continuous duration of sixty (60) minutes and provide telemetered output data that meets the technical requirements specified in the Market Protocols. The specific testing procedures for a Resource to become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource are described in the Market Protocols and are coordinated by the Transmission Provider.

The following requirements apply when a Resource is currently registered in the Integrated Marketplace or when a Market Participant requests that the Transmission Provider administer the test for a non-registered Resource:

- (1) A resource may become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource only after it achieves three regulation test scores of seventy-five percent (75%) or greater where the calculation of the regulation test score is defined in the Market Protocols;
- (2) The Market Participant must notify the Transmission Provider at least one hundred twenty (120) minutes before the test is scheduled to begin;
- (3) The Transmission Provider has final authority to determine whether a regulation test can be performed and reserves the right to alter the start time or terminate the test at any time;
- (4) The Transmission Provider will verify the test results and send confirmation to the Market Participant within fourteen (14) Operating Days;
- (5) The Transmission Provider may administer a regulation test on any Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource to verify continued qualification;
- (6) The Transmission Provider may disqualify a previously qualified resource for persistent failure to follow regulation deployment instructions as described in the Market Protocols. A Market Participant may request a re-test if the Resource was disqualified as a Regulation Qualified Resource, Regulation-Up Qualified

Resource or Regulation-Down Qualified Resource. The Resource must attain a test score of seventy-five percent (75%) or greater in order to be re-qualified.

- (7) After initial qualification, a compliance rating of seventy-five percent (75%) or greater must be maintained where the compliance rating calculation is defined in the Market Protocols.

The following requirements apply when a resource is not registered in the Integrated Marketplace and is in the process of being registered:

- (1) A Market Participant or prospective Market Participant shall either self-test as described in the Market Protocols or request that the Transmission Provider administer testing as an alternative to self-testing;
- (2) If the Market Participant or prospective Market Participant performs a self-test on the resource, it shall submit all testing data to the Transmission Provider;
- (3) The resource will be qualified to become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource after the resource achieves three regulation test scores of seventy-five percent (75%) or greater. The regulation test score calculation is defined in the Market Protocols. If a Market Participant achieves these passing scores before completion of registration, the resource will become a Regulation-Up Qualified Resource, Regulation-Down Qualified Resource or Regulation Qualified Resource upon entry into the Integrated Marketplace.

2.10.3 Regulation Qualified Resources

A Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource must pass a specific regulation test as defined below and must be capable of deploying one hundred percent (100%) of cleared Regulation-Up and/or Regulation-Down within the Regulation Response Time for a continuous duration of sixty (60) minutes and provide telemetered output data that meets the technical requirements specified in the Market Protocols. The specific testing procedures for a Resource to become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource are described in the Market Protocols and are coordinated by the Transmission Provider. ~~under the following guidelines:~~

The following requirements apply when a Resource is currently registered in the Integrated Marketplace or when a Market Participant requests that the Transmission Provider administer the test for a non-registered Resource:

- (1) A resource may be ~~come certified as~~ a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource only after it achieves three ~~consecutive~~ regulation test scores of seventy-five percent (75%) or ~~above greater~~ where the calculation of the regulation test score is defined in the Market Protocols;
- (2) ~~The first of these tests may be performed internally by the Market Participant. The Market Participant must notify~~ Notification to perform a regulation test must be ~~made to~~ the Transmission Provider at least one hundred twenty (120) minutes before the test is scheduled to begin;
- (3) The Transmission Provider ~~makes the final determination~~ has final authority to determine about whether a regulation test can be performed and reserves the right to alter the start time or terminate the test at any time;
- (4) ~~Only one test may be performed on a Resource each Operating Day~~ The Transmission Provider will verify the test results and send confirmation to the Market Participant within fourteen (14) Operating Days;

- (5) The Transmission Provider may ~~perform~~administer a regulation test on any Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource to verify continued ~~certification~~qualification;
- (6) The Transmission Provider may disqualify a previously qualified resource for persistent failure to follow regulation deployment instructions as described in the Market Protocols. A Market Participant may request a re-test if the Resource was disqualified as a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource. The Resource must attain a test score of seventy-five percent (75%) or greater in order to be re-qualified.
- (7) After initial ~~certification~~qualification, a compliance rating of seventy-five percent (75%) or ~~above~~greater must be maintained where the compliance rating calculation is defined in the Market Protocols.

The following requirements apply when a resource is not registered in the Integrated Marketplace and is in the process of being registered:

- (1) A Market Participant or prospective Market Participant shall either self-test as described in the Market Protocols or request that the Transmission Provider administer testing as an alternative to self-testing;
- (2) If the Market Participant or prospective Market Participant performs a self-test on the resource, it shall submit all testing data to the Transmission Provider;
- (3) The resource will be qualified to become a Regulation Qualified Resource, Regulation-Up Qualified Resource or Regulation-Down Qualified Resource after the resource achieves three regulation test scores of seventy-five percent (75%) or greater. The regulation test score calculation is defined in the Market Protocols. If a Market Participant achieves these passing scores before completion of registration, the resource will become a Regulation-Up Qualified Resource, Regulation-Down Qualified Resource or Regulation Qualified Resource upon entry into the Integrated Marketplace.