

June 1, 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. ER15-1152-____
Compliance Filing of Southwest Power Pool, Inc.

Dear Secretary Bose:

Pursuant to the Commission's May 1, 2015, order in this proceeding (the "May 1 Order")¹ and section 206 of the Federal Power Act ("FPA"), 16 U.S.C. § 824e, Southwest Power Pool, Inc. ("SPP") submits revisions to SPP's Open Access Transmission Tariff ("Tariff")² in compliance with the May 1 Order. SPP requests an effective date of May 1, 2015, for the Tariff revision submitted in this filing, which is consistent with the effective date established in the May 1 Order.

I. BACKGROUND

On March 2, 2015, SPP submitted proposed Tariff revisions (the "March 2 Filing")³ that would allow implementation of an interim Auction Revenue Right ("ARR") allocation (the "Transitional ARR Allocation") by which ARRs could be

¹ *Sw. Power Pool, Inc.*, 151 FERC ¶ 61,087 (2015).

² Southwest Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1.

³ Submission of Tariff Revisions Regarding a Transitional Process for Allocation of Auction Revenue Rights of Southwest Power Pool, Inc., Docket No. ER15-1152-000 (Mar. 2, 2015).

allocated to (1) transmission owners in the process of incorporating existing transmission facilities into SPP's system and (2) certain other entities with firm transmission service on such existing facilities. The Commission conditionally accepted the March 2 Filing subject to a compliance filing that would allow transmission owners to request a Transitional ARR Allocation regardless of whether they are new or existing market participants.⁴

II. DESCRIPTION OF COMPLIANCE REVISION

As indicated in the documents included with this filing, the Commission's directives on compliance are accomplished by deletion of the word "new" that previously appeared before "Market Participant" in Section 7.11 of Attachment AE to the Tariff.⁵

III. ADDITIONAL INFORMATION

A. Documents Submitted With This Filing

In addition to this transmittal letter, a Clean and Redline Tariff revision under the Sixth Revised Volume No. 1. is included with this filing.

B. Effective Date

SPP requests that the Commission accept the Tariff revision proposed herewith effective May 1, 2015, consistent with the effective date approved in the May 1 Order.

⁴ See the May 1 Order P 16.

⁵ The proposed revision reads as follows:

7.11 Transitional ARR Allocation

A Transmission Owner joining the Integrated Marketplace as a ~~new~~ Market Participant may request the Transmission Provider perform a Transitional ARR Allocation to the extent that the Transmission Owner is incorporating existing transmission facilities into the SPP Transmission System under the Tariff and the timing of such incorporation does not allow participation in the annual ARR allocation process described under Section 7.2 of this Attachment AE. Eligible Entities with firm transmission service on that Transmission Owner's facilities may participate in the allocation. . . .

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C. Service

SPP has served a copy of this filing on all parties designated on the official service list compiled by the Secretary in this proceeding, as well as SPP's Members, Customers, Market Participants, and all affected state commissions. A complete copy of this filing will be posted on the SPP website, www.spp.org.

IV. CONCLUSION

SPP respectfully requests that the Commission accept the Tariff revision submitted in this filing as just and reasonable and compliant with the May 1 Order, effective as discussed above.

Respectfully submitted,

/s/ Joseph W. Ghormley

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Little Rock, Arkansas, this 1st day of June, 2015.

/s/ Michelle Harris
Michelle Harris

7.11 Transitional ARR Allocation

A Transmission Owner joining the Integrated Marketplace as a Market Participant may request the Transmission Provider perform a Transitional ARR Allocation to the extent that the Transmission Owner is incorporating existing transmission facilities into the SPP Transmission System under the Tariff and the timing of such incorporation does not allow participation in the annual ARR allocation process described under Section 7.2 of this Attachment AE. Eligible Entities with firm transmission service on that Transmission Owner's facilities may participate in the allocation. The Transmission Provider shall conduct the Transitional ARR Allocation consistent with the processes described under Section 7.1 and Section 7.2 of this Attachment AE, provided that:

- (1) The Transitional ARR Allocation shall be performed in a single round;
- (2) At a minimum, the Transitional ARR Allocation must include the winter and spring season and align with the other annual ARR periods; and
- (3) All TCRs previously awarded in the annual TCR auction and all remaining ARRs not accounted for in the annual TCR auction (as defined in Section 7.6 of this Attachment AE) for the applicable study period are modeled as fixed injections at the specified sources and fixed withdrawals at the specified sinks. To the extent that these fixed injections and withdrawals are no longer feasible, the Transmission Provider will make the minimum adjustments necessary to the ratings of the applicable transmission facilities in the model in order to allow the model to produce a feasible solution solely for the purpose of assessing transitional ARR feasibility.

7.11 Transitional ARR Allocation

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- (1) The Transitional ARR Allocation shall be performed in a single round;
- (2) At a minimum, the Transitional ARR Allocation must include the winter and spring season and align with the other annual ARR periods; and
- (3) All TCRs previously awarded in the annual TCR auction and all remaining ARRs not accounted for in the annual TCR auction (as defined in Section 7.6 of this Attachment AE) for the applicable study period are modeled as fixed injections at the specified sources and fixed withdrawals at the specified sinks. To the extent that these fixed injections and withdrawals are no longer feasible, the Transmission Provider will make the minimum adjustments necessary to the ratings of the applicable transmission facilities in the model in order to allow the model to produce a feasible solution solely for the purpose of assessing transitional ARR feasibility.