December 12, 2019

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. ER20-_____
Compliance Filing to Include Continuous Run-Time Requirement in Attachment AA of the Tariff in Response to Order Issued in Docket No. EL19-101-000

Dear Secretary Bose:

Pursuant to Section 206 of the Federal Power Act (“FPA”), 16 U.S.C. § 824e, Southwest Power Pool, Inc. (“SPP”) submits this compliance filing to revise Attachment AA of the SPP Open Access Transmission Tariff (“Tariff”)¹ in accordance with the Federal Energy Regulatory Commission’s (“Commission”) directive in its order issued October 17, 2019.² SPP respectfully requests that the Commission accept the proposed revision as just and reasonable.

I. BACKGROUND

A. SPP

SPP is a Commission-approved Regional Transmission Organization (“RTO”).³ SPP is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP has 99 Members, including 16 investor-owned utilities, 14 municipal systems, 20 generation and transmission cooperatives, 8 state agencies, 15

¹ Southwest Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1. References in this filing to “Tariff” refer to the version of SPP’s Tariff currently in effect. “Proposed Tariff” refers to a version reflecting the revisions proposed in this filing. All capitalized terms not otherwise defined in this filing shall have the definitions assigned by the Tariff.


independent power producers, 12 power marketers, 11 independent transmission companies, 1 federal agency, and 2 large retail customers. As an RTO, SPP: (1) administers, across the facilities of SPP's Transmission Owners, open access transmission service over approximately 66,900 miles of transmission lines covering portions of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming; and (2) 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.4

B. Docket No. EL19-101-000

This proceeding arose in the context of SPP’s compliance with the Commission’s Order No. 841.5 Order No. 841 required each RTO and Independent System Operator (“ISO”) to have tariff provisions allowing an Electric Storage Resource (“ESR”) to provide capacity, energy, and ancillary services the ESR is technically capable of providing while meeting all of the RTO/ISO’s technical, operational, and performance requirements.6 In its initial compliance filing dated December 3, 2018, SPP pointed out it does not have a capacity market but does have a Resource Adequacy Requirement that Load Responsible Entities (“LREs”) meet by designating resources to supply required amounts of capacity.7 SPP also advised the Commission that SPP’s current rules would permit an ESR to be designated for meeting the Resource Adequacy Requirement as long as the ESR met the same continuous run time requirement applicable to other types of resources.8


6 Id. at P 76.


8 Id.
On April 1, 2019, the Commission requested additional information regarding various aspects of SPP’s December 2018 Compliance Filing.9 The Commission’s Data Request included questions regarding SPP’s Resource Adequacy Requirement and, in particular, the continuous run time requirement for resources used to satisfy said obligation.10 On May 1, 2019, SPP responded to the Commission’s request for additional information.11 In the Data Request Response, SPP cited the seasonal net capability rating, which is set forth in the SPP Planning Criteria and which requires a resource’s net capability to be available for a minimum of four continuous hours.12 SPP also discussed section 7.0 of Attachment AA of the Tariff, which sets forth requirements for qualifying a resource for purposes of complying with SPP’s Resource Adequacy Requirement.13

In the October 17 Order, the Commission noted that the continuous run time requirement SPP cited is set forth in the SPP Planning Criteria rather than the Tariff, and the Commission stated, as a general matter, that details regarding operational and performance requirements may be located in the SPP Planning Criteria.14 The Commission found, however, that the continuous run time requirement at issue determines whether a resource is eligible to be used for satisfaction of SPP’s Resource Adequacy Requirement and thus significantly affects rates, terms, and conditions of service.15 The Commission commenced this FPA Section 206 proceeding and directed SPP to include the minimum run-time requirement in its Tariff.16 In doing so, the Commission carved this specific issue out from the remainder of SPP’s Order No. 841

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10 Data Request at 2-3.


12 Data Request Response at 4 (citing the SPP Planning Criteria at Section 7.1.6(2)). The SPP Planning Criteria are posted on SPP’s website at: https://www.spp.org/spp-documents-filings/?id=18162.

13 Data Request Response at 4 – 5 (citing Section 7.0 of Attachment AA of the Tariff).

14 October 17 Order at P 61.

15 October 17 Order at PP 61-62.

16 Id.
compliance proceeding and directed that filings on this issue be made only in a separate docket.17

II. COMPLIANCE WITH OCTOBER 17 ORDER

In compliance with the Commission’s directive, SPP submits revisions to section 7.0 of Attachment AA of the Tariff. As SPP has discussed, that section sets forth the requirements for qualifying a resource that will be used to satisfy the Attachment AA Resource Adequacy Requirement. Section 7.0 currently contains subsections 7.1 through 7.6. Existing section 7.6 contains generally applicable language regarding confidentiality of language submitted pursuant to Attachment AA, and SPP proposes to renumber it as section 7.7 to maintain its position as the final provision of section 7.0. SPP proposes to insert the continuous run-time requirement in a new section 7.6 that reads as follows:

A resource qualified in accordance with Section 7.1, 7.2, or 7.4 of this Attachment AA shall be capable of supplying its accredited capacity, as determined in accordance with SPP Planning Criteria, for a minimum of four (4) continuous hours.18

The proposed language uses the term “accredited capacity,” which is the general term used in Attachment AA to refer to the concept that is described by various terms in the SPP Planning Criteria.19 In addition, sections 7.1, 7.2, and 7.4 are specified in the proposed language because they contain the requirements for qualification of resources that are internal to the SPP Balancing Authority and are thus subject to the existing continuous run time specified in the SPP Planning Criteria. In contrast, sections 7.3 and 7.5 discuss qualification of resources that are external to the SPP Balancing Authority and are thus subject to another Balancing Authority’s criteria. This proposed language preserves the scope of the existing continuous run-time requirement by limiting its application to resources that are subject to SPP’s Planning Criteria.

17 Id. at P 63.
18 Proposed Tariff at Attachment AA, Section 7.6.
19 See, e.g., the definitions of Deliverable Capacity and Firm Capacity in the Tariff at Attachment AA, Section 2.0. The term “accredited capacity” in Attachment AA represents the same concept described by the terms “net generating capacity” and “net capability” used in sections 7.1 and 7.1.6(2) of the SPP Planning Criteria, respectively.
The revisions proposed herein comply with the Commission’s directive in the October 17 Order and insert into the Tariff SPP’s existing continuous run time requirement that is currently set forth only in its Planning Criteria. The revisions submitted in this filing do not expand or limit that existing requirement. While SPP policy and governing document language regarding operational and performance requirements may be appropriate subjects for ongoing and future consideration, particularly with regard to integration and participation of ESRs, SPP believes such discussions and analysis are outside the narrow scope of this Section 206 proceeding and are more appropriate for consideration in the SPP stakeholder process.

III. EFFECTIVE DATE

For all the reasons discussed in this transmittal letter, SPP requests that the Commission accept the proposed revisions to the Tariff to become effective as of October 28, 2019, which is the date the Commission’s notice of this proceeding was published in the Federal Register.

IV. ADDITIONAL INFORMATION

A. Documents submitted with this filing:

In addition to this Transmittal Letter, Clean and Redlined Tariff revisions under the Sixth Revised Volume No. 1.

B. Service:

SPP has electronically served a copy of this filing on all its Members, Transmission 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. A copy of this filing has also been served on all parties on the Commission’s official service list in Docket No. EL19-101-000.
C. Communications

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

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V. CONCLUSION

For the foregoing reasons SPP respectfully requests that the Commission issue an order accepting the Tariff revisions, find that SPP has complied with the October 17 Order in this proceeding, and grant an effective date of October 28, 2019.

Respectfully submitted,

/s/ Joseph W. Ghormley
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Little Rock, AR 72223  
Telephone: (501) 614-3368  
jghormley@spp.org

Attorney for  
Southwest Power Pool, Inc.
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 Docket No. EL19-101-000.

Dated at Little Rock, AR, this 12th day of December 2019.

/s/ Michelle Harris
Michelle Harris
7.0 Qualification of Deliverable Capacity, Firm Capacity, and Firm Power

7.1 As part of the annual Workbook submission, an LRE or Generator Owner with Deliverable Capacity from resources internal to the SPP Balancing Authority Area shall qualify such capacity by: (a) registering the Resource in the Integrated Marketplace; (b) submitting, or causing to be submitted, to the Transmission Provider the current Operational Test results as performed in accordance with the SPP Planning Criteria; and (c) submitting, or causing to be submitted, to the Transmission Provider the current Capability Test results as performed in accordance with the SPP Planning Criteria.

7.2 As part of the annual Workbook submission, an LRE or Generator Owner with Firm Capacity from a resource(s) internal to the SPP Balancing Authority Area shall qualify such capacity by: (a) demonstrating the resource(s) is (i) registered in the Integrated Marketplace or (ii) listed as a Designated Resource in the Network Integration Transmission Service Agreement; (b) submitting, or causing to be submitted, to the Transmission Provider the current Operational Test results as performed in accordance with the SPP Planning Criteria; (c) submitting, or causing to be submitted, to the Transmission Provider the current Capability Test results as performed in accordance with the SPP Planning Criteria; and (d) demonstrating that there is firm transmission service from the internal resource(s) to the LRE’s load.

7.3 As part of the annual Workbook submission, an LRE or Generator Owner with Firm Capacity from a resource(s) external to the SPP Balancing Authority Area shall qualify such capacity by: (a) demonstrating ownership or contractual rights; (b) submitting, or causing to be submitted, to the Transmission Provider the current operational test results per the requirements of the Balancing Authority where the resource(s) is located; (c) demonstrating that there is firm transmission service from the external resource(s) to the LRE’s load; and (d) attesting that any external capacity being identified is not otherwise being used as capacity in any other Balancing Authority Area or in another resource adequacy construct.
7.4 As part of the annual Workbook submission, an LRE with Firm Power from a resource(s) internal to the SPP Balancing Authority Area shall qualify those purchases or sales by: (a) demonstrating the resource(s) is (i) registered in the Integrated Marketplace or (ii) listed as a Designated Resource in the Network Integration Transmission Service Agreement; (b) submitting, or causing to be submitted, to the Transmission Provider the current Operational Test results as performed in accordance with the SPP Planning Criteria; (c) submitting, or causing to be submitted, to the Transmission Provider the current Capability Test results as performed in accordance with the SPP Planning Criteria; and (d) demonstrating that there is firm transmission service from the internal resource(s) to the LRE’s load.

7.5 As part of the annual Workbook submission, an LRE with Firm Power from a resource(s) external to the SPP Balancing Authority Area shall qualify those purchases or sales by: (a) demonstrating ownership or contractual rights; (b) submitting, or causing to be submitted, to the Transmission Provider the current operational test results per the requirements of the Balancing Authority where the resource(s) is located; (c) demonstrating that there is firm transmission service from the external resource(s) to the LRE’s load; (d) demonstrating that the capacity includes planning reserves; and (e) attesting that any external capacity being identified is not otherwise being used as capacity in any other Balancing Authority Area or in another resource adequacy construct.

7.6 A resource qualified in accordance with Section 7.1, 7.2, or 7.4 of this Attachment AA shall be capable of supplying its accredited capacity, as determined in accordance with SPP Planning Criteria, for a minimum of four (4) continuous hours.

7.7 The Transmission Provider shall make all reasonable efforts to preserve the confidentiality of information received pursuant to Section 7 of this Attachment AA when such information is so designated as “confidential” and if such designation is
reasonable, except to the extent required by this Tariff, by regulatory or judicial order, by law or statute.
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7.6 A resource qualified in accordance with Section 7.1, 7.2, or 7.4 of this Attachment AA shall be capable of supplying its accredited capacity, as determined in accordance with SPP Planning Criteria, for a minimum of four (4) continuous hours.

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