

SOUTHWEST POWER POOL, INC.
Western Markets Executive Committee & Western Markets Working Group Joint
Meeting
September 2, 2020
12:00 p.m. – 2:00 p.m. CPT
Net-Conference

SUMMARY OF MOTIONS AND ACTION ITEMS

MOTIONS:

1. **Agenda Item 1 – Agenda**

WMEC Motion: Dan Walter (TSGT) motioned to approve the agenda. Tom Christensen (BEPC) provided the second. Motion carried unanimously.

2. **Agenda Item 2 – WRR6 WEIS Transmission Availability (Issue 1) WMWG Comments 082820**

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified. Valerie Weigel (BEPC) provided the second.

WMWG Motion: Mike Mason (TSGT) motioned to amend the motion to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified to include modifications made during the September 2nd, 2020 joint WMWG/WMEC meeting. Chris Powell (WAPA) provided the second. Motion carried unanimously.

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified during the August 28th, 2020 joint WMWG/WMEC meeting and the September 2nd, 2020 joint WMWG/WMEC meeting. Valerie Weigel (BEPC) provided the second. Motion carried unanimously.

WMEC Motion: Clay MacArthur (Deseret) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) as approved by the WMWG. Dan Walter (TSGT) provided the second. Motion carried unanimously.

ACTION ITEMS:

Action Item: SPP will create a WEIS Tariff definition for Market Operator and will use the historical NERC definition for Market Operator as guidance.

MINUTES

AGENDA ITEM 1 – ADMINISTRATIVE ITEMS

Tim Vigil (CRSP WAPA) called the meeting to order at 12:00 p.m.. Tim Vigil (CRSP WAPA) reviewed the agenda with the group.

The following WMEC members were in attendance or represented by proxy:

- Tim Vigil (Chair), CRSP WAPA
- Dan Walter (Vice Chair), TSGT
- Bradley Hans, MEAN
- Clay MacArthur, Deseret Power
- David Neumayer, WAPA
- Lori Frisk, WAPA
- Rosemary Henry, WMPA
- Tom Christensen, BEPC

The following WMWG members were in attendance or represented by proxy:

- Valerie Weigel (Chair), BEPC
- Jeff Lindsay (Vice Chair), MEAN
- Chris Powell, WAPA
- Lorrie Bliss, Deseret Power
- Mike Mason, TSGT
- Neil Lindgren, WAPA UGPM
- Rosemary Henry, WMPA
- Shane Messano, WAPA

WMEC Motion: Dan Walter (TSGT) motioned to approve the agenda. Tom Christensen (BEPC) provided the second. Motion carried unanimously.

AGENDA ITEM 2 – WRR6 WEIS TRANSMISSION AVAILABILITY (ISSUE 1) WMWG COMMENTS 082820

WRR6 WMWG Comments 082820

Valerie Weigel reminded the WMWG that a motion to approve WRR 6 (WEIS Transmission Availability (Issue1)) as modified was postponed until this meeting and that the motion to approve WRR6 as modified in on the floor. David Kelley (SPP) refreshed the group on the objective of WRR6 (WEIS Transmission Availability (Issue 1)), explaining the WRR was reviewed

and modified during the August 28th joint WMWG and WMEC meeting. He reminded the WMWG that modifications were made to the language in Attachment D to better clarify the intent of how Joint Dispatch Transmission Service would be used by the WEIS Market.

The group discussed WRR6 and proposed additional modifications to Section 1.2.11 to state that the Joint Dispatch Transmission Service Provider will communicate the transmission capacity to SPP, through their participating Balancing Authority (BA), and to clarify that SPP is acting in its capacity as the WEIS Market Operator. The group also agreed that a definition for Market Operator will be added to the Tariff and the definition will use the historical NERC definition for Market Operator as guidance.

The WMEC discussed that the Tariff language sets up the policy at the appropriate level and that there will need to be more details in the WEIS Market Protocols and business practices to describe the inputs and Market use of Transmission availability. Black Hills shared concerns about there not being a timing requirement for the submission of transmission capacity by Market Participants, Joint Dispatch Transmission Service Providers, and participating BAs. SPP responded that the Tariff language allows for the updating of transmission information as close to real-time as possible such that the market can accommodate the various agreements and contracts in existence that govern transmission information. SPP added that additional clarification can also be included in the WEIS Market Protocols and business practices.

PSCo noted they did not have any additional concerns with the Tariff language for WRR6, however they are interested in working with SPP and WEIS Participants on an approach to addressing any issues that may occur after the market starts.

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified. Valerie Weigel (BEPC) provided the second.

WMWG Motion: Mike Mason (TSGT) motioned to amend the motion to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified to include modifications made in the September 2nd, 2020 joint WMWG/WMEC meeting. Chris Powell (WAPA) provided the second. Motion carried unanimously.

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified during the 8/28/2020 meeting and the 9/2/2020 meeting. Valerie Weigel (BEPC) provided the second. Motion carried unanimously.

WMEC Motion: Clay MacArthur (Deseret) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) as approved by the WMWG. Dan Walter (TSGT) provided the second. Motion carried unanimously.

AGENDA ITEM 3 – NEW ACTION ITEMS

Action Item: SPP will create a WEIS Tariff definition for Market Operator and will use the historical NERC definition for Market Operator as guidance.

AGENDA ITEM 4 – ADJOURNMENT

Tim Vigil (CRSP WAPA) adjourned the meeting at 12:57 p.m., CPT.

Respectfully Submitted – Daniel Harless, WMWG Staff Secretary, and David Kelley, WMEC Staff Secretary

		Western Markets Working Group & Western Markets Executive Committee Joint Meeting September 2, 2020 Attendance
P	= By Phone	
*	= By Proxy	

WMWG Representatives			
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Day 1	Full Name	Company	E-mail
P	Valerie Weigel (Chair)	Basin Electric Power Co.	vweigel@bepec.com
P	Jeff Lindsay (Vice-Chair)	Municipal Energy Agency of Nebraska	jlindsay@nmppenergy.org
P	Daniel Harless (Secretary)	SPP	dharless@spp.org
P	Chris Powell	Western Area Power Administration	powell@wapa.gov
P	Lorrie Bliss	Deseret Power	lbliss@deseretpower.com
P	Michael Mason	Tri-State Generation & Transmission Association	mmason@tristategt.org
P	Neil Lindgren	WAPA UGPM	lindgren@wapa.gov
P	Rosemary Henry	Wyoming Municipal Power Agency	rosemary@wmpa.org
P	Shane Messano	Western Area Power Administration	smessano@wapa.gov

WMEC Representatives			
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P	Timothy Vigil (Chair)	CRSP WAPA	tvigil@wapa.gov
P	Dan Walter (Vice-Chair)	Tri-State Generation & Transmission Association	dwalter@tristategt.org
P	David Kelley (Secretary)	SPP	dkelley@spp.org
P	Bradley Hans	MEAN	bhans@nmppenergy.org
P	Clay MacArthur	Deseret Power	cmacarthur@deseretpower.com
P	David Neumayer	Western Area Power Administration	neumayer@wapa.gov
P	Lori Frisk	Western Area Power Administration	frisk@wapa.gov
P	Rosemary Henry	Wyoming Municipal Power Agency	rosemary@wmpa.org
P	Tom Christensen	Basin Electric Power Co.	tomc@bepec.com

Attendees			
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P	Adam Arellano	WAPA	jarellano@wapa.gov
P	Alycia Kramer	BEPC	akramer@bepec.com
P	Amy Cut	WAPA CRSP	cut@wapa.gov
P	Brian Sadler	WAPA CRSP	sadler@wapa.gov
P	Carrie Dixon	Xcel Energy	carrie.e.dixon@xcelenergy.com
P	Chris Bultsma	WAPA	bultsma@wapa.gov
P	Chris Nolen	Southwest Power Pool	cnolen@spp.org
P	Claire Douthit	WAPA	douthit@wapa.gov
P	David Boyd	University of St. Thomas	dboyd@stthomas.edu
P	Dennis Reed	Midwest Regulatory Consulting	dennis.reed@mwregcon.com
P	Don Martin	Southwest Power Pool	dmartin@spp.org
P	Doug Clark	Southwest Power Pool	dclark@spp.org
P	Eric Egge	Black Hills	eric.megge@blackhillscorp.com
P	Farrokh Rahimi	OATI	farrokh.rahimi@oati.net
P	Gary Cate	Southwest Power Pool	gcate@spp.org
P	Ian Wren	SPP MMU	iwren@spp.org
P	Jason Mazigian	BEPC	jmazigian@bepec.com
P	Jason Smith	Lincoln Clean	jsmith@lincolnclean.com
P	Jeff Pace	TEA	jpace@teainc.org
P	Jeremy West	Tri-State Generation & Transmission Association	jeremy.west@tristategt.org
P	Jill Jones	MEAN	jjones@nmppenergy.org
P	Jim Gonzalez	Southwest Power Pool	jgonzalez@spp.org
P	Jodi Woods	SPP MMU	jwoods@spp.org
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P	Jonathan Aust	WAPA	aust@wapa.gov
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P	Katie Southworth		katherine.southworth@gmail.com
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P	Michelle Harris	Southwest Power Pool	mharris@spp.org
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P	Nick Detmer	Xcel Energy	nick.detmer@xcelenergy.com
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P	Steve Davis	Southwest Power Pool	sdavis@spp.org
P	Steve Johnson	Southwest Power Pool	sjohnson@spp.org
P	Steve Sanders	WAPA-UGP	sanders@wapa.gov
P	Steve Szablya	Xcel Energy	steve.szablya@xcelenergy.com
P	Steve White	Southwest Power Pool	swhite@spp.org
P	Tom Kleckner	RTO Insider	tom.kleckner@rtoinsider.com
P	Will Nipper	Southwest Power Pool	wnipper@spp.org
P	Zea Flores	WAPA	zflores@wapa.gov

**SOUTHWEST POWER POOL, INC.
WESTERN MARKETS EXECUTIVE COMMITTEE
AND WESTERN MARKETS WORKING GROUP JOINT MEETING
September 2nd, 2020
12:00 p.m.-2:00 p.m. CDT
Net Conference**

AGENDA

1. Administrative Items..... Tim Vigil/David Kelley
 - A. Call to Order, Attendance, Agenda Review
2. WRR6 – WEIS Transmission Availability (Issue 1) WMWG Comments 082820 (Approval Item)..... David Kelley/Daniel Harless
3. New Action ItemsDavid Kelley
4. Adjournment Tim Vigil

***Antitrust:** SPP strictly prohibits use of participation in SPP activities as a forum for engaging in practices or communications that violate the antitrust laws. Please avoid discussion of topics or behavior that would result in anti-competitive behavior, including but not limited to, agreements between or among competitors regarding prices, bid and offer practices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that might unreasonably restrain competition.*

WEIS Revision Request Comment Form

WRR #: 6	Date: 8/28/2020
WRR Title: WEIS Transmission Availability (Issue 1)	
SUBMITTER INFORMATION	
Name: Daniel Harless (SPP) on behalf of the WMWG	Company: SPP
Email: dharless@spp.org	Phone: 501.688.8303
OBJECTIVE OF REVISION	
<p>Objectives of WEIS Revision Request:</p> <p><i>Describe the problem/issue this revision request will resolve.</i></p> <p>In Paragraph 42 of the order rejecting SPP's filing in dockets ER20-1059/ER20-1060, the Commission provided guidance on the issue of non-participant transmission by stating:</p> <p style="padding-left: 40px;">"Any future proposal for the SPP WEIS Market should include the mechanisms or agreements that will ensure that the SPP WEIS Market respects the transmission capacity of non-participating entities with appropriate constraints in the SCED. If SPP is not able to reach an arrangement with non-participating entities to use their transmission capacity, SPP must include constraints in its market model to appropriately respect the transmission rights of non-participating entities when calculating the market solution."</p> <p>This revision request incorporates changes to the WEIS Tariff to provide that SPP will include constraints in the WEIS Market's economic dispatch to use the combined transmission capability made available by Market Participants and participating Balancing Authorities on transmission facilities within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.</p> <p><i>Describe the benefits that will be realized from this revision.</i></p> <p>This revision request ensures SPP follows FERC's guidance in the Rejection Order from Docket Nos. ER20-1059/ER20-1060.</p>	
COMMENTS	
<p>These comments are written on WRR6 SPP Comments 082420 and WRR6 SPP Comments 082720. WRR6 SPP Comments 082420 highlighted yellow. WRR6 SPP Comments 082720 are highlighted blue. The comments proposed in this document are highlighted green.</p> <p>Overview of SPP Comments 082420 = In Section 1.2.11 below, the language was reorganized from the previous posted language to clarify the obligations of SPP to constrain dispatch the WEIS Market, Market Participant's obligation to communicate transmission capacity, and the Balancing Authority's obligation to communicate transmission capacity. The remaining language in Section 4.3 and Attachment D is unchanged from previous posted version.</p> <p>Overview of SPP Comments 082720 = In these updated comments, SPP is proposing to incorporate certain modifications as a result of the comments to WRR6 submitted by XES and Black Hills. Specifically, changes have been made to Section 1.2.11 to include the role of the Joint Dispatch Transmission Service Provider in communicating information to their participating BA regarding transmission capacity that has been made available to Market Participants. Additional clarifying edits were adopted from Black Hills' comments to Attachment D.</p> <p>Overview of WMWG Comments 082820 = During the review of WRR6 at the August 28, 2020 joint meeting of the WMEC and WMWG, it was identified that additional clarifying edits to Attachment D would better describe the intent of how Joint Dispatch Transmission Service would be used by the WEIS Market. These additional edits make it clear that Joint Dispatch Transmission Service is subject to the limitations described in Section 1.2.11(3) of Attachment A.</p>	

PROPOSED REVISION(S)

In the appropriate sections below, provide proposed revisions to the WEIS Revision Request for which you are providing comments. Use the language from the WEIS Revision Request Submission Form or the Recommendation Report, whichever is more recent.

1. Open the document containing the language you would like to edit, e.g., WRR Submission Form or WRR Recommendation Report
2. Ensure Track Changes is turned off on both the forward looking protocols and this WRR Submission Form. Track Changes is located on Review tab above.
3. While in the document containing the language you are proposing edits to, select and copy the language you would like to edit
4. Paste the language to this Comment Form
5. Turn on Track Changes and make the edits you would like to propose

WEIS Tariff

Attachment A

1.2.11 WEIS Market Transmission Capacity Availability for use by WEIS Market

1. SPP Obligation to Constrain the WEIS Market's Economic Dispatch

SPP will create and maintain constraints in the WEIS Market's Security Constrained Economic Dispatch based on the transmission capacity communicated by Market Participant's, Joint Dispatch Transmission Service Providers, and participating Balancing Authorities in Sections 1.2.11(2) and (3), and (4) below. The WEIS Market's Security Constrained Economic Dispatch will be constrained in accordance with WEIS Market Protocols and approved WEIS business practices.

2. Market Participant Obligation to Communicate Transmission Capacity

For SPP to constrain the WEIS Market dispatch, Market Participants must communicate, and accurately represent, to SPP and their participating Balancing Authority the Market Participant's: ~~Unless otherwise prohibited by law, regulation or contract, Market Participants shall make available to SPP for purposes of operating the WEIS Market their:~~

- ~~reserved but unused, and otherwise available, rights to transmission capacity~~ ~~ability on transmission facilities located within a participating Balancing Authority Area;~~
- ~~reserved but unused, and otherwise available, rights to transmission capacity~~ ~~on transmission facilities used to transfer energy between participating Balancing Authorities;~~
- ~~rights to transmission capacity~~ ~~ability in accordance with agreements it has entered with third parties which that permit the Market Participant's WEIS Market's use of third another party's transmission system within a participating Balancing Authority Area; and~~
- ~~rights to~~ ~~on transmission capacity in accordance with agreements that permit the Market Participant's use of another party's transmission facilities used to transfer energy between participating Balancing Authority~~ ~~ies Areas.~~

3. Joint Dispatch Transmission Service Provider Obligation to Communicate Transmission Capacity

For SPP to constrain the WEIS Market dispatch, Joint Dispatch Transmission Service Providers must communicate, and accurately represent, to SPP and their participating Balancing Authority the Market Participant's transmission capacity:

- i. transmission capacity that has been made available to Market Participants as Joint Dispatch Transmission Service on facilities within the participating Balancing Authority Area if the Market Participant is a Transmission Service Provider, as defined by North American Electric Reliability Corporation ("NERC"), administering transmission service within a participating Balancing Authority Area; and
- ii. transmission capacity that has been made available to Market Participants as Joint Dispatch Transmission Service on transmission facilities used to transfer energy between participating Balancing Authority Areas.

34. Participating Balancing Authority Obligation to Communicate Transmission Capacity

For SPP to constrain the WEIS Market Dispatch, Participating Balancing Authorities shall must communicate make available to SPP the transmission capacity that represents the combination of:

- i. any transmission capacity capability in accordance with agreements it has entered with third parties which that permit the WEIS Market's Balancing Authority's use of third another party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities; and
- ii. transmission capacity communicated to participating Balancing Authorities by Market Participants and Joint Dispatch Transmission Service Providers pursuant to Section 1.2.11(2) and (3).

For SPP to constrain the WEIS Market dispatch, participating Balancing Authorities shall communicate to SPP any changes to the transmission capacity communicated to SPP pursuant to this Section 1.2.11(34) as soon as practicable before such change becomes effective in the next Dispatch Interval.

Market Participants shall communicate and accurately represent to its participating Balancing Authority and to SPP, its transmission capability described in Sections 1.2.11(a). Market Participants shall communicate to its participating Balancing Authority and SPP any changes to this information as soon as practicable before such changes become effective. Market Participants may communicate this information to SPP through their participating Balancing Authority.

Participating Balancing Authorities shall provide to SPP data and information in accordance with the WEIS Market Protocols and approved WEIS business practices to facilitate the creation and maintenance of constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability in Sections 1.2.11(a) and (b).

Using the data and information provided by participating Balancing Authorities, SPP will create and maintain transmission constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability described in Section 1.2.11(a) and (b).

4.3 Coordination of Market Operations under *Transmission Operations and SPP Congestion Management*

(1) SPP will incorporate the data *provided by* reliability coordinators and ~~transmission operators-participating Balancing Authorities~~ for congestion management in the dispatch solution.

This data includes:

- (a) Out-of-Merit Dispatch instructions
- (b) Binding transmission constraints
- (c) Changes in import and export transactions associated with the WEIS Market.

(2) SPP will continuously activate constraints in the SCED to constrain the least cost dispatch to the transmission capability made available for use in the WEIS Market in accordance with Section 1.2.11 of Attachment A of this Tariff. SPP will update these constraints as soon as practicable when information is received from Market Participants and participating Balancing Authorities regarding changes to the transmission capability that is available for use in the WEIS Market. SPP will maintain a list on its public website of the constraints activated in the SCED pursuant to this Section 4.3(2).

ATTACHMENT D JOINT DISPATCH TRANSMISSION SERVICE

Service pursuant to Attachment D to this Tariff shall be applicable to i) Joint Dispatch Transmission Service Providers that have provided within their open access transmission tariff, a transmission service schedule for energy dispatched at the rate specified in Schedule 2 of this Tariff for Joint Dispatch Transmission Service on an intra-hour non-firm, as-available basis with the lowest curtailment priority and ii) Joint Dispatch Transmission Service Customers receiving Energy Imbalance Service pursuant to Schedule 1 to this Tariff.

Limited Joint Dispatch Transmission Service Provider Responsibilities. The Joint Dispatch Transmission Service Provider shall subject to the requirements of Section 1.2.11(3) of Attachment A, have the obligation to make available the otherwise unused physical capability of ~~the~~ transmission system-facilities under their tariff for purposes of providing Joint Dispatch Transmission Service to support delivery of Imbalance Energy and to operate its transmission system- the facilities under their tariff in accordance with Good Utility Practice. For purposes of Joint Dispatch Transmission Service,

the Joint Dispatch Transmission Service Provider shall have no obligation to plan, construct, or maintain its transmission system for the benefit of any Joint Dispatch Transmission Service Customer.

Restrictions on Use of Service. The Joint Dispatch Transmission Service Customer shall not use Joint Dispatch Transmission Service for (i) off-system sales of capacity or energy or (ii) direct or indirect provision of transmission service by the Joint Dispatch Transmission Service Customer to any third party. Joint Dispatch Transmission Service may be used only for receipt or delivery of energy dispatched within a Balancing Authority Area in the WEIS Market on an intra-hour, non-firm basis to serve wholesale or retail native load. Energy produced within a Resource's Operating Tolerance and in response to WEIS Market dispatch instruction is considered delivered utilizing Joint Dispatch Transmission Service.

Conditions Precedent for Receiving Service. Subject to the terms and conditions of this Attachment D of the Tariff, and related schedules and attachments, the Joint Dispatch Transmission Service Provider will provide Joint Dispatch Transmission Service to any Joint Dispatch Transmission Service Customer. Joint Dispatch Transmission Service is provided commensurate with energy dispatched within the WEIS Market pursuant to the provisions of this Tariff. As such, the Joint Dispatch Transmission Customer is not required to separately request or make application for Joint Dispatch Transmission Service. A Joint Dispatch Transmission Service Provider that also takes Joint Dispatch Transmission Service under a tariff agrees to provide comparable service that it is capable of providing to all Joint Dispatch Transmission Service Providers on similar terms and conditions over facilities used for the transmission of electric energy in interstate commerce owned, controlled or operated by Joint Dispatch Transmission Service Providers.

WEIS Revision Request Comment Form

WRR #: 6	Date: 8/26/2020
WRR Title: WEIS Transmission Availability (Issue 1)	
SUBMITTER INFORMATION	
Name: Eric Egge	Company: Black Hills Energy
Email: eric.m.egge@blackhillscorp.com	Phone: 605-721-2646
OBJECTIVE OF REVISION	
<p>Objectives of WEIS Revision Request: <i>Describe the problem/issue this revision request will resolve.</i> In Paragraph 42 of the order rejecting SPP’s filing in dockets ER20-1059/ER20-1060, the Commission provided guidance on the issue of non-participant transmission by stating:</p> <p style="padding-left: 40px;">“Any future proposal for the SPP WEIS Market should include the mechanisms or agreements that will ensure that the SPP WEIS Market respects the transmission capacity of non-participating entities with appropriate constraints in the SCED. If SPP is not able to reach an arrangement with non-participating entities to use their transmission capacity, SPP must include constraints in its market model to appropriately respect the transmission rights of non-participating entities when calculating the market solution.”</p> <p>This revision request incorporates changes to the WEIS Tariff to provide that SPP will include constraints in the WEIS Market’s economic dispatch to use the combined transmission capability made available by Market Participants and participating Balancing Authorities on transmission facilities within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.</p> <p><i>Describe the benefits that will be realized from this revision.</i> This revision request ensures SPP follows FERC’s guidance in the Rejection Order from Docket Nos. ER20-1059/ER20-1060.</p>	
COMMENTS	
<p>Black Hills Power, Inc. and Cheyenne Light, Fuel and Power (collectively “Black Hills”) have attempted to provide comments and proposed tariff edits in response to WRR #6, however Black Hills is concerned that the expedited WRR process which is being utilized (a 5-6 business day turn-around between release and proposed vote) is hindering a full and complete analysis of the issues and concerns raised by FERC, in its order rejecting the tariff, and a similarly full and complete analysis of the consequences and impacts of SPP’s proposed solutions.</p> <p>Black Hills Power, Inc. And Cheyenne Light, Fuel and Power believe that that the language in 1.2.11.3 considered together with recent communications from WAPA, appears intended to circumvent FERC’s clear directive that non-market participant transmission rights be protected or that non-participants be compensated for use of their transmission. Specifically, the broad language of the WRR, general comments by WAPA about a planned (but yet to be provided) new section in the currently under discussion pro forma WAPA BA Agreement related to transmission usage, and comments at the WMEC meeting relating to transmission rights in BA Agreements, taken together give rise to a real concern that SPP and WAPA are inappropriately trying to avoid FERC’s clear direction by having a non-jurisdictional participating BA make access to uncompensated use of non-participant transmission a condition of receiving BA services. This is despite the fact that SPP and WAPA also seek to charge the non-participant for administrative and implementation costs of a market in which the non-participant has elected not to join. It is impossible to evaluate the scope and breadth of the proposed tariff language and whether it protects non-participant’s transmission rights as WAPA has only verbally discussed that it will be proposing additional language regarding use of</p>	

BA Customer transmission and has not supplied any language in writing. Black Hills has included language to the proposed WRR that clearly identifies that the dispatch should be constrained to the transmission service procured by MPs over transmission contract paths and not based upon flow. This is important to meet the requirements of the FERC order as the western interconnection transmission service is contract path based and not flow based. Per the explanation provided at the 8/21 WMEC meeting, Black Hills is concerned SPP's proposal to constrain transmission rights based upon generation shift factors does not adequately protect non-participating transmission providers. In addition, Black Hills has added marginal comments noting its concern that SPP has not explained how JDTS can work in a jointly operated system like the CUS, where one of the CUS members is a Market Participant and two are not.

At this point, Black Hills cannot support SPP's proposed WEIS filing SPP has not fully addressed the issues identified by Black Hills in its original protests or by FERC in its order. Black Hills has reviewed the comments on this WRR filed by XES, supports those comments and incorporates them herein.

The comments were written on WRR6 SPP Comments 082420 and are highlighted below.

PROPOSED REVISION(S)

In the appropriate sections below, provide proposed revisions to the WEIS Revision Request for which you are providing comments. Use the language from the WEIS Revision Request Submission Form or the Recommendation Report, whichever is more recent.

1. *Open the document containing the language you would like to edit, e.g., WRR Submission Form or WRR Recommendation Report*
2. *Ensure Track Changes is turned off on both the forward looking protocols and this WRR Submission Form. Track Changes is located on Review tab above.*
3. *While in the document containing the language you are proposing edits to, select and copy the language you would like to edit*
4. *Paste the language to this Comment Form*
5. *Turn on Track Changes and make the edits you would like to propose*

WEIS Tariff

Attachment A

1.2.11 WEIS Market Transmission Use Capacity Availability for use by WEIS Market

1. SPP Obligation to Constrain the WEIS Market's Economic Dispatch

SPP will create and maintain constraints in the WEIS Market's Security Constrained Economic Dispatch based on the transmission capacity service rights over transmission contract paths communicated by Market Participant's and participating Balancing Authorities in Sections 1.2.11(2) and (3) below. The WEIS Market's Security Constrained Economic Dispatch will be constrained in accordance with WEIS Market Protocols and approved WEIS business practices.

2. Market Participant Obligation to Communicate Transmission Capacity Service Rights

For SPP to constrain the WEIS Market dispatch, Market Participants must communicate, and accurately represent, to SPP and their participating Balancing Authority the Market Participant's: ~~Unless otherwise prohibited by law, regulation or contract, Market Participants shall make available to SPP for purposes of operating the WEIS Market their:~~

- i. reserved but unused, and otherwise available, rights to transmission capacity/service capability on across transmission facilities/paths located within a participating Balancing Authority Area;
- ii. reserved but unused, and otherwise available, rights to transmission capacity/service or on across transmission facilities/paths used to transfer energy between participating Balancing Authorities;
 - rights to transmission capacity/service capability in accordance with agreements it has entered with third parties which that permit the Market Participant's WEIS Market's use of third/another party's transmission system within a participating Balancing Authority Area;
 - rights to or on transmission capacity in accordance with agreements that permit the Market Participant's use of another party's transmission facilities used to transfer energy between participating Balancing Authorities Areas;
- iii. transmission capacity/service that has been made available to Market Participants as Joint Dispatch Transmission Service on facilities within the participating Balancing Authority Area if the Market Participant is a Transmission Service Provider, as defined by North American Electric Reliability Corporation ("NERC"), administering transmission service within a participating Balancing Authority Area; and
- iv. transmission capacity/service that has been made available to Market Participants as Joint Dispatch Transmission Service on transmission facilities used to transfer energy between participating Balancing Authority Areas.

3. Participating Balancing Authority Obligation to Communicate Transmission Capacity

~~For SPP to constrain the WEIS Market Dispatch, participating Balancing Authorities shall must communicate make available to SPP, any transmission capacity/service capability in accordance with agreements it has entered with third parties which that permit the WEIS Market's Balancing Authority's use of third/another party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.~~

~~For SPP to constrain the WEIS Market dispatch, participating Balancing Authorities shall communicate to SPP any changes to the Section 1.2.11(3) as soon as practicable.~~

- ~~Market Participants shall communicate and accurately represent to its participating Balancing Authority and to SPP, its transmission capability described in Sections 1.2.11(a). Market Participants shall communicate to its participating Balancing Authority and SPP any changes to this information as soon as practicable before such changes become effective. Market Participants may communicate this information to SPP through their participating Balancing Authority.~~
- ~~Participating Balancing Authorities shall provide to SPP data and information in accordance with the WEIS Market Protocols and approved WEIS business practices to facilitate the creation and maintenance of constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability in Sections 1.2.11(a) and (b).~~
- ~~Using the data and information provided by participating Balancing Authorities, SPP will create and maintain transmission constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability described in Section 1.2.11(a) and (b).~~

4.3 Coordination of Market Operations under *Transmission Operations and SPP Congestion Management*

(1) SPP will incorporate the data *provided by* reliability coordinators, transmission operators and ~~transmission operators-participating Balancing Authorities~~ for congestion management in the dispatch solution. This data includes:

- (a) Out-of-Merit Dispatch instructions
- (b) Binding transmission constraints
- (c) Changes in import and export transactions associated with the WEIS Market.

(2) SPP will continuously activate constraints in the SCED to constrain the least cost dispatch to the transmission ~~capability~~service made available over transmission contract paths for use in the WEIS Market in accordance with Section 1.2.11 of Attachment A of this Tariff. SPP will update these constraints as soon as practicable when information is received from Market Participants and ~~participating Balancing Authorities~~ regarding changes to their transmission ~~capability~~service rights that ~~is~~are available for use in the WEIS Market. SPP will maintain a list on its public website of the constraints activated in the SCED pursuant to this Section 4.3(2).

ATTACHMENT D JOINT DISPATCH TRANSMISSION SERVICE

Service pursuant to Attachment D to this Tariff shall be applicable to i) Joint Dispatch Transmission Service Providers that is a Transmission Service Provider, as defined by the North American Reliability Corporation (“NERC”), that have provided within their open access transmission tariff, a transmission service schedule for energy dispatched at the rate specified in Schedule 2 of this Tariff for Joint Dispatch Transmission Service on an intra-hour non-firm, as-available basis with the lowest curtailment priority and ii) Joint Dispatch Transmission Service Customers receiving Energy Imbalance Service pursuant to Schedule 1 to this Tariff.

Limited Joint Dispatch Transmission Service Provider Responsibilities. The Joint Dispatch Transmission Service Provider shall have the obligation to make available the otherwise unused physical capability of ~~its the~~ transmission ~~facilities under their tariff system~~ for purposes of providing Joint Dispatch Transmission Service to support delivery of Imbalance Energy and to operate ~~the~~

~~facilities under their tariff its transmission system~~ in accordance with Good Utility Practice. For purposes of Joint Dispatch Transmission Service, the Joint Dispatch Transmission Service Provider shall have no obligation to plan, construct, or maintain ~~its the~~ transmission ~~facilities under their tariff system~~ for the benefit of any Joint Dispatch Transmission Service Customer.

Restrictions on Use of Service. The Joint Dispatch Transmission Service Customer shall not use Joint Dispatch Transmission Service for (i) off-system sales of capacity or energy or (ii) direct or indirect provision of transmission service by the Joint Dispatch Transmission Service Customer to any third party. Joint Dispatch Transmission Service may be used only for receipt or delivery of energy dispatched within a Balancing Authority Area in the WEIS Market on an intra-hour, non-firm basis to serve wholesale or retail native load. Energy produced within a Resource's Operating Tolerance and in response to WEIS Market dispatch instruction is considered delivered utilizing Joint Dispatch Transmission Service.

Conditions Precedent for Receiving Service. Subject to the terms and conditions of this Attachment D of the Tariff, and related schedules and attachments, the Joint Dispatch Transmission Service Provider will provide Joint Dispatch Transmission Service to any Joint Dispatch Transmission Service Customer. Joint Dispatch Transmission Service is provided commensurate with energy dispatched within the WEIS Market pursuant to the provisions of this Tariff. As such, the Joint Dispatch Transmission Customer is not required to separately request or make application for Joint Dispatch Transmission Service. A Joint Dispatch Transmission Service Provider that also takes Joint Dispatch Transmission Service under a tariff agrees to provide comparable service that it is capable of providing to all Joint Dispatch Transmission Service Providers on similar terms and conditions over facilities used for the transmission of electric energy in interstate commerce owned, controlled or operated by Joint Dispatch Transmission Service Providers.

WEIS Revision Request Comment Form

WRR #: 6	Date: 8/24/2020
WRR Title: WEIS Transmission Availability (Issue 1)	
SUBMITTER INFORMATION	
Name: David Kelley	Company: Southwest Power Pool
Email: dkelley@spp.org	Phone: 501.688.1671
OBJECTIVE OF REVISION	
<p>Objectives of WEIS Revision Request:</p> <p><i>Describe the problem/issue this revision request will resolve.</i></p> <p>In Paragraph 42 of the order rejecting SPP's filing in dockets ER20-1059/ER20-1060, the Commission provided guidance on the issue of non-participant transmission by stating:</p> <p style="padding-left: 40px;">"Any future proposal for the SPP WEIS Market should include the mechanisms or agreements that will ensure that the SPP WEIS Market respects the transmission capacity of non-participating entities with appropriate constraints in the SCED. If SPP is not able to reach an arrangement with non-participating entities to use their transmission capacity, SPP must include constraints in its market model to appropriately respect the transmission rights of non-participating entities when calculating the market solution."</p> <p>This revision request incorporates changes to the WEIS Tariff to provide that SPP will include constraints in the WEIS Market's economic dispatch to use the combined transmission capability made available by Market Participants and participating Balancing Authorities on transmission facilities within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.</p> <p><i>Describe the benefits that will be realized from this revision.</i></p> <p>This revision request ensures SPP follows FERC's guidance in the Rejection Order from Docket Nos. ER20-1059/ER20-1060.</p>	
COMMENTS	
<p>In Section 1.2.11 below, the language was reorganized from the previous posted language to clarify the obligations of SPP to constrain dispatch the WEIS Market, Market Participant's obligation to communicate transmission capacity, and the Balancing Authority's obligation to communicate transmission capacity. The remaining language in Section 4.3 and Attachment D is unchanged from previous posted version.</p>	
PROPOSED REVISION(S)	
<p><i>In the appropriate sections below, provide proposed revisions to the WEIS Revision Request for which you are providing comments. Use the language from the WEIS Revision Request Submission Form or the Recommendation Report, whichever is more recent.</i></p> <ol style="list-style-type: none"> 1. <i>Open the document containing the language you would like to edit, e.g., WRR Submission Form or WRR Recommendation Report</i> 2. <i>Ensure Track Changes is turned off on both the forward looking protocols and this WRR Submission Form. Track Changes is located on Review tab above.</i> 3. <i>While in the document containing the language you are proposing edits to, select and copy the language you would like to edit</i> 4. <i>Paste the language to this Comment Form</i> 5. <i>Turn on Track Changes and make the edits you would like to propose</i> 	

WEIS Tariff

Attachment A

1.2.11 WEIS Market Transmission Capacity Availability for use by WEIS Market

1. SPP Obligation to Constrain the WEIS Market's Economic Dispatch

SPP will create and maintain constraints in the WEIS Market's Security Constrained Economic Dispatch based on the transmission capacity communicated by Market Participant's and participating Balancing Authorities in Sections 1.2.11(2) and (3) below. The WEIS Market's Security Constrained Economic Dispatch will be constrained in accordance with WEIS Market Protocols and approved WEIS business practices.

2. Market Participant Obligation to Communicate Transmission Capacity

For SPP to constrain the WEIS Market dispatch, Market Participants must communicate, and accurately represent, to SPP and their participating Balancing Authority the Market Participant's: ~~Unless otherwise prohibited by law, regulation or contract, Market Participants shall make available to SPP for purposes of operating the WEIS Market their:~~

- i. ~~reserved but unused, and otherwise available, rights to transmission capacity~~ ~~on transmission facilities located within a participating Balancing Authority Area;~~
- ii. ~~reserved but unused, and otherwise available, rights to transmission capacity~~ ~~or on transmission facilities used to transfer energy between participating Balancing Authorities;~~
- iii. ~~rights to transmission capacity~~ in accordance with agreements ~~it has entered with third parties which that~~ permit the ~~Market Participant's WEIS Market's~~ use of ~~third another~~ party's transmission system within a participating Balancing Authority Area;
- iv. ~~rights to or on~~ transmission capacity in accordance with agreements that permit the Market Participant's use of another party's transmission facilities used to transfer energy between participating Balancing Authority ~~ies~~ Areas;
- v. transmission capacity that has been made available to Market Participants as Joint Dispatch Transmission Service on facilities within the participating Balancing Authority Area ~~if the Market Participant is a Transmission Service Provider, as defined by North American Electric Reliability Corporation ("NERC"), administering transmission service within a participating Balancing Authority Area;~~ and
- vi. transmission capacity that has been made available to Market Participants as Joint Dispatch Transmission Service on transmission facilities used to transfer energy between participating Balancing Authority Areas.

3. Participating Balancing Authority Obligation to Communicate Transmission Capacity

For SPP to constrain the WEIS Market Dispatch, ~~P~~participating Balancing Authorities ~~shall~~ ~~must~~ communicate ~~make available~~ to SPP, any transmission ~~capacity~~ ~~capability~~ in accordance with agreements ~~it has entered with third parties which~~ that permit the WEIS Market's ~~Balancing Authority's~~ use of ~~third another~~ party's transmission system within a participating Balancing

Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.

For SPP to constrain the WEIS Market dispatch, participating Balancing Authorities shall communicate to SPP any changes to the Section 1.2.11(3) as soon as practicable.

~~Market Participants shall communicate and accurately represent to its participating Balancing Authority and to SPP, its transmission capability described in Sections 1.2.11(a). Market Participants shall communicate to its participating Balancing Authority and SPP any changes to this information as soon as practicable before such changes become effective. Market Participants may communicate this information to SPP through their participating Balancing Authority.~~

~~Participating Balancing Authorities shall provide to SPP data and information in accordance with the WEIS Market Protocols and approved WEIS business practices to facilitate the creation and maintenance of constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability in Sections 1.2.11(a) and (b).~~

~~Using the data and information provided by participating Balancing Authorities, SPP will create and maintain transmission constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability described in Section 1.2.11(a) and (b).~~

4.3 Coordination of Market Operations under *Transmission Operations and SPP* Congestion Management

(1) SPP will incorporate the data *provided* by reliability coordinators and ~~transmission operators participating Balancing Authorities~~ for congestion management in the dispatch solution.

This data includes:

- (a) Out-of-Merit Dispatch instructions
- (b) Binding transmission constraints
- (c) Changes in import and export transactions associated with the WEIS Market.

(2) ~~SPP will continuously activate constraints in the SCED to constrain the least cost dispatch to the transmission capability made available for use in the WEIS Market in accordance with Section 1.2.11 of Attachment A of this Tariff. SPP will update these constraints as soon as practicable when information is received from Market Participants and participating Balancing Authorities regarding changes to the transmission capability that is available for use in the WEIS Market. SPP will maintain a list on its public website of the constraints activated in the SCED pursuant to this Section 4.3(2).~~

ATTACHMENT D JOINT DISPATCH TRANSMISSION SERVICE

Service pursuant to Attachment D to this Tariff shall be applicable to i) Joint Dispatch Transmission Service Providers that have provided within their open access transmission tariff, a transmission service schedule for energy dispatched at the rate specified in Schedule 2 of this Tariff for Joint Dispatch Transmission Service on an intra-hour non-firm, as-available basis with the lowest curtailment priority and ii) Joint Dispatch Transmission Service Customers receiving Energy Imbalance Service pursuant to Schedule 1 to this Tariff.

Limited Joint Dispatch Transmission Service Provider Responsibilities. The Joint Dispatch Transmission Service Provider shall have the obligation to make available the otherwise unused physical capability of its transmission system for purposes of providing Joint Dispatch Transmission Service to support delivery of Imbalance Energy and to operate its transmission system in accordance with Good Utility Practice. For purposes of Joint Dispatch Transmission Service, the Joint Dispatch Transmission Service Provider shall have no obligation to plan, construct, or maintain its transmission system for the benefit of any Joint Dispatch Transmission Service Customer.

Restrictions on Use of Service. The Joint Dispatch Transmission Service Customer shall not use Joint Dispatch Transmission Service for (i) off-system sales of capacity or energy or (ii) direct or indirect provision of transmission service by the Joint Dispatch Transmission Service Customer to any third party. Joint Dispatch Transmission Service may be used only for receipt or delivery of energy dispatched within a Balancing Authority Area in the WEIS Market on an intra-hour, non-firm basis to serve wholesale or retail native load. Energy produced within a Resource's Operating Tolerance and in response to WEIS Market dispatch instruction is considered delivered utilizing Joint Dispatch Transmission Service.

Conditions Precedent for Receiving Service. Subject to the terms and conditions of this Attachment D of the Tariff, and related schedules and attachments, the Joint Dispatch Transmission Service Provider will provide Joint Dispatch Transmission Service to any Joint Dispatch Transmission Service Customer. Joint Dispatch Transmission Service is provided commensurate with energy dispatched within the WEIS Market pursuant to the provisions of this Tariff. As such, the Joint Dispatch Transmission Customer is not required to separately request or make application for Joint Dispatch Transmission Service. A Joint Dispatch Transmission Service Provider that also takes Joint Dispatch Transmission Service under a tariff agrees to provide

comparable service that it is capable of providing to all Joint Dispatch Transmission Service Providers on similar terms and conditions over facilities used for the transmission of electric energy in interstate commerce owned, controlled or operated by Joint Dispatch Transmission Service Providers.

SPP WEIS Revision Request Form

WRR Title: WEIS Transmission Availability (Issue 1)	Date: 8/20/2020
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SPP STAFF TO COMPLETE THIS SECTION

WRR #: 6

Impact Analysis Required? No Yes | **If no, but system or process changes are needed please explain why an Impact Assessment will not be performed: These changes will be included**

System Changes No Yes | **If yes, summarize expected changes:**

Process Changes? No Yes | **If yes, summarize expected changes:**

SUBMITTER INFORMATION

Name: David Kelley	Company: Southwest Power Pool
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Email: dkelley@spp.org	Phone: 501.688.1671
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Only Qualified Entities may submit WEIS Revision Requests.
Please select at least one applicable option below, as it applies to the named submitter(s).

<input type="checkbox"/> Signatory of the Western Joint Dispatch Agreement <input type="checkbox"/> Any staff member of a governmental authority having jurisdiction over the SPP Western Market Services or any WEIS Market Participant <input type="checkbox"/> Any rostered individual of an official SPP WMEC organizational group <input type="checkbox"/> Any entity designated by a Qualified Entity to submit a WEIS Revision Request "on their behalf"	<input type="checkbox"/> Any WEIS Market Participant <input type="checkbox"/> SPP Western Transmission Customers or other entities that are parties to transactions under the SPP WEIS Tariff <input type="checkbox"/> SPP Market Monitor <input checked="" type="checkbox"/> SPP Staff
--	--

SPP WEIS REVISION REQUEST DETAILS

Requested Resolution Timing: Normal Expedited Urgent Action

Reason for Expedited/Urgent Resolution: This WEIS Revision Request requires expedited treatment, because this WRR is in response to FERC's rejection of the WEIS Tariff filing (ER20-1059-000/ER20-1060-000) and requires a time sensitive refiling.

Type of WEIS Revision Request (select all that apply):

<input type="checkbox"/> Correction (i.e., correcting language that is incorrect) <input type="checkbox"/> Clarification (i.e., revising existing language to better represent the intent/purpose, no changes to functionality) <input type="checkbox"/> Enhancement (i.e., revising existing language to expand upon intent or functionality) <input checked="" type="checkbox"/> New Methodologies impacting SPP Western Markets (i.e, new language to accommodate new functionality or rules not existing today)	<input type="checkbox"/> NERC Standard Impact (Specifically state if revision relates to/or impacts NERC Standards, list standard(s)) <input type="checkbox"/> FERC Mandate (List order number(s))
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REVISION REQUEST RISK DRIVERS

Are there existing risks to one or more SPP Western Market Participants or the BES driving the need for this WRR?

Yes No

If yes, provided details to explain the risk and timelines associated:

Compliance (Tariff, WEIS Protocols, Other)

Reliability/Operations

Financial

SPP WEIS Revision Request Documents Requiring Revisions:

Please select your primary intended document(s) as well as all others known that could be impacted by the requested modification request

<input type="checkbox"/> WEIS Market Protocols	Section(s):	Document Version:
<input checked="" type="checkbox"/> WEIS Tariff	Section(s): <ul style="list-style-type: none"> • Attachment A – 1.2.11 (new), 4.3 • Attachment D 	Document Version:
<input type="checkbox"/> WEIS Revision Request Process	Section(s):	Document Version:
<input type="checkbox"/> [NAME OF DOCUMENT]	Section(s):	Document Version:

OBJECTIVE OF MODIFICATION

Objectives of WEIS Revision Request:

Describe the problem/issue this revision request will resolve.

In Paragraph 42 of the order rejecting SPP’s filing in dockets ER20-1059/ER20-1060, the Commission provided guidance on the issue of non-participant transmission by stating:

“Any future proposal for the SPP WEIS Market should include the mechanisms or agreements that will ensure that the SPP WEIS Market respects the transmission capacity of non-participating entities with appropriate constraints in the SCED. If SPP is not able to reach an arrangement with non-participating entities to use their transmission capacity, SPP must include constraints in its market model to appropriately respect the transmission rights of non-participating entities when calculating the market solution.”

This revision request incorporates changes to the WEIS Tariff to provide that SPP will include constraints in the WEIS Market’s economic dispatch to use the combined transmission capability made available by Market Participants and participating Balancing Authorities on transmission facilities within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.

Describe the benefits that will be realized from this revision.

This revision request ensures SPP follows FERC’s guidance in the Rejection Order from Docket Nos. ER20-1059/ER20-1060.

REVISIONS TO SPP WEIS REVISION REQUEST PROCESS DOCUMENTS

In the appropriate sections below, please provide the language from the document(s) for which you are requesting modification(s), with all edits redlined using Track Changes on from the Review tab above.

These instructions can be applied to any WRR Process Document:

- 1. Open the forward looking version of the WEIS Market Protocols (.a)*
- 2. Ensure Track Changes is turned off on both the forward looking protocols and this WRR Submission Form*
- 3. While in the forward looking protocols, select and copy the language you would like to edit*
- 4. Paste the language to this Submission form*
- 5. Turn on Track Changes and make the edits you would like to propose*

WEIS Tariff Attachment A

1.2.11 Transmission Availability for use by WEIS Market

- (a) Unless otherwise prohibited by law, regulation or contract, Market Participants shall make available to SPP for purposes of operating the WEIS Market their:
- i. reserved but unused, transmission capability on transmission facilities located within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities;
 - ii. transmission capability in accordance with agreements it has entered with third parties which permit the WEIS Market's use of third party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities;
 - iii. Joint Dispatch Transmission Service on facilities within the participating Balancing Authority Area if the Market Participant is a Transmission Service Provider, as defined by North American Electric Reliability Corporation ("NERC"), administering transmission service within a participating Balancing Authority Area.
- (b) Participating Balancing Authorities shall make available to SPP, any transmission capability in accordance with agreements it has entered with third parties which permit the WEIS Market's use of third party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.
- (c) Market Participants shall communicate and accurately represent to its participating Balancing Authority and to SPP, its transmission capability described in Sections 1.2.11(a). Market Participants shall communicate to its participating Balancing Authority and SPP -any changes to this information as soon as practicable before such changes become effective. Market Participants may communicate this information to SPP through their participating Balancing Authority.
- (d) Participating Balancing Authorities shall provide to SPP data and information in accordance with the WEIS Market Protocols and approved WEIS business practices to facilitate the creation and maintenance of constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability in Sections 1.2.11(a) and (b).
- (e) Using the data and information provided by participating Balancing Authorities, SPP will create and maintain transmission constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability described in Section 1.2.11(a) and (b).

4.3 Coordination of Market Operations under *Transmission Operations and SPP* Congestion Management

(1) SPP will incorporate the data *provided by* reliability coordinators and ~~transmission operators~~ participating Balancing Authorities for congestion management in the dispatch solution. This data includes:

- (a) Out-of-Merit Dispatch instructions
- (b) Binding transmission constraints
- (c) Changes in import and export transactions associated with the WEIS Market.

(2) SPP will continuously activate constraints in the SCED to constrain the least cost dispatch to the transmission capability made available for use in the WEIS Market in accordance with Section 1.2.11 of Attachment A of this Tariff. SPP will update these constraints as soon as practicable when information is received from Market Participants and participating Balancing Authorities regarding changes to the transmission capability that is available for use in the WEIS Market. SPP will maintain a list on its public website of the constraints activated in the SCED pursuant to this Section 4.3(2).

ATTACHMENT D JOINT DISPATCH TRANSMISSION SERVICE

Service pursuant to Attachment D to this Tariff shall be applicable to i) Joint Dispatch Transmission Service Providers that have provided within their open access transmission tariff, a transmission service schedule for energy dispatched at the rate specified in Schedule 2 of this Tariff for Joint Dispatch Transmission Service on an intra-hour non-firm, as-available basis with the lowest curtailment priority and ii) Joint Dispatch Transmission Service Customers receiving Energy Imbalance Service pursuant to Schedule 1 to this Tariff.

Limited Joint Dispatch Transmission Service Provider Responsibilities. The Joint Dispatch Transmission Service Provider shall have the obligation to make available the otherwise unused physical capability of its transmission system for purposes of providing Joint Dispatch Transmission Service to support delivery of Imbalance Energy and to operate its transmission system in accordance with Good Utility Practice. For purposes of Joint Dispatch Transmission Service, the Joint Dispatch Transmission Service Provider shall have no obligation to plan, construct, or maintain its transmission system for the benefit of any Joint Dispatch Transmission Service Customer.

Restrictions on Use of Service. The Joint Dispatch Transmission Service Customer shall not use Joint Dispatch Transmission Service for (i) off-system sales of capacity or energy or (ii) direct or indirect provision of transmission service by the Joint Dispatch Transmission Service Customer to any third party. Joint Dispatch Transmission Service may be used only for receipt or delivery of energy dispatched within a Balancing Authority Area in the WEIS Market on an intra-hour, non-firm basis to serve wholesale or retail native load. Energy produced within a Resource's Operating Tolerance and in response to WEIS Market dispatch instruction is considered delivered utilizing Joint Dispatch Transmission Service.

Conditions Precedent for Receiving Service. Subject to the terms and conditions of this Attachment D of the Tariff, and related schedules and attachments, the Joint Dispatch Transmission Service Provider will provide Joint Dispatch Transmission Service to any Joint Dispatch Transmission Service Customer. Joint Dispatch Transmission Service is provided commensurate with energy dispatched within the WEIS Market pursuant to the provisions of this Tariff. As such, the Joint Dispatch Transmission Customer is not required to separately request or make application for Joint Dispatch Transmission Service. A Joint Dispatch Transmission Service Provider that also takes Joint Dispatch Transmission Service under a tariff agrees to provide comparable service that it is capable of providing to all Joint Dispatch Transmission Service Providers on similar terms and conditions over facilities used for the transmission of electric energy in interstate commerce owned, controlled or operated by Joint Dispatch Transmission Service Providers.

WEIS Revision Request Comment Form

WRR #: 6	Date: 8/25/2020
WRR Title: WEIS Transmission Availability (Issue 1)	
SUBMITTER INFORMATION	
Name: Nick Detmer	Company: Xcel Energy
Email: nick.detmer@xcelenergy.com	Phone: 720.201.5788
OBJECTIVE OF REVISION	
<p>Objectives of WEIS Revision Request:</p> <p><i>Describe the problem/issue this revision request will resolve.</i></p> <p>In Paragraph 42 of the order rejecting SPP’s filing in dockets ER20-1059/ER20-1060, the Commission provided guidance on the issue of non-participant transmission by stating:</p> <p style="padding-left: 40px;">“Any future proposal for the SPP WEIS Market should include the mechanisms or agreements that will ensure that the SPP WEIS Market respects the transmission capacity of non-participating entities with appropriate constraints in the SCED. If SPP is not able to reach an arrangement with non-participating entities to use their transmission capacity, SPP must include constraints in its market model to appropriately respect the transmission rights of non-participating entities when calculating the market solution.”</p> <p>This revision request incorporates changes to the WEIS Tariff to provide that SPP will include constraints in the WEIS Market’s economic dispatch to use the combined transmission capability made available by Market Participants and participating Balancing Authorities on transmission facilities within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.</p> <p><i>Describe the benefits that will be realized from this revision.</i></p> <p>This revision request ensures SPP follows FERC’s guidance in the Rejection Order from Docket Nos. ER20-1059/ER20-1060.</p>	
COMMENTS	
<p>XES provides these comments and redlines to SPP’s proposed WEIS Tariff changes in the interest continued dialogue and making progress.</p> <p>In general, XES appreciates that SPP appears to be altering its proposal to address FERC’s order relating to use of transmission rights of non-participants for market dispatch.</p> <p>However, XES is concerned that SPP’s proposed tariff changes do not fully capture important elements of SPP’s plans for market dispatch and XES is very concerned that SPP’s current plans, as XES understands them, may signal an intention to use transmission rights of non-participants for market operations. Further, XES is concerned that SPP’s plans do not fully address concerns that it and others have raised about SPP’s planned market operations. While this list is not exhaustive, the following enumerates XES’s key concerns about what it has heard to date about SPP’s current plans to operate the market. Specifically,</p> <p>Based on SPP staff’s discussion during webcasts last week, it appears that SPP plans to apply constraints managed by shift factors to determine whether sufficient transmission rights are available to accommodate the market flow. SPP has also stated on many occasions that parallel flow impacts will not be considered in SPP’s use of transmission for WEIS market flows. In our view, SPP’s proposed methodology, as we understand it, could result in higher usage of transmission rights than is allowed under the contract path methodology resulting in harm to non-participant entity rights. The PJM-MISO and MISO-SPP JOAs were developed in part to address the impact of parallel flows transmission rights resulting from the transition from contract path congestion management to market dispatch. Similar</p>	

arrangements between SPP and non-market participants are needed to ensure that parallel flows do not unfairly impact non-participants in the WEIS. It would be useful for SPP to provide us with an example to determine the amount of flow that can be accommodated for WEIS transactions while respecting ATC and non-participant transmission rights. Further, how SPP's methodology will respect transmission priorities used by the market dispatch, which we explain in bullet 2.

We are not aware that SPP has developed a mechanism to ensure that WEIS market flow is curtailed according to transmission priority or that SPP has plans to identify schedule feasibility of the WEIS transactions. To the contrary, we are concerned that firm transactions will be curtailed prior to curtailment of untagged, lower priority market flows. The JDA parties implemented business practices to ensure lower priority JDA market flows were not being dispatched ahead of firm transactions and the CAISO has schedule feasibility tests, including congestion rent mechanisms to allocate costs to parties contributing to congestion. XES requests SPP explain how the WEIS Market will evaluate the feasibility of WEIS Market transactions and ensure that lower priority market flow transactions are curtailed ahead of firm transactions.

SPP has developed no mechanism that we are aware of that would ensure that contingency reserve transactions can flow. These transactions are considered firm by agreement of the NWPP participants even though they are tagged on an after-the-fact basis. SPP must address how its market dispatch will accommodate contingency reserve deployments.

We do not agree with SPP's position that FERC's order does not require execution of seams agreements such as that executed between BPA and the CAISO EIM. We have been attempting to coordinate a seams arrangement with SPP for a number of weeks/months. We first raised our concerns with SPP as early as the Fall 2019. We remain committed to coordinating seams discussions and arrangements with SPP and continue to be willing to make personnel available for needed discussions.

At this juncture XES is not in a position to support SPP's proposed upcoming WEIS filing as XES does not believe that SPP has fully addressed the issues identified by XES in its original protest or by FERC in its order. Further, SPP's proposed use of transmission distribution factors, information that was not available to us prior to last week, raises further significant concerns both about use of such factors and about lack of detail about SPP's plans that could have further negative implications for non-participants.

XES's more specific comments on this particular RR are provided below.

Summary of changes

1. 1.2.11, a., iii, was deleted and added as subpart (b) and made applicable to Transmission Service Providers. JDTS is a Transmission Service Provider service, not a Market Participant service. Also, a Participating Balancing Authority does not have authority to offer transmission service – that is generally the role of a Transmission Service Provider. Therefore, the language has been modified to clarify that Transmission Service Providers with available service that has been expressly been made available for the WEIS Market within Participating BAs shall provide that information to SPP.
2. Various locations, "Transmission Service Provider" was added to identify the entity responsible for providing the transmission capability available for the WEIS Market to use. Participating BAs may have several Transmission Service Providers, some that are participating in the WEIS Market, and others that are not, therefore, it's not appropriate for the Participating BA to be responsible for this information.
3. 1.2.11(b) and in Attachment D: XES has added the phrase "expressly permitted" in order to clarify that even if unused transmission capability is available within the participating BA, the transmission can only be used by the WEIS Market if that capability has been expressly been granted to the WEIS Market for its use. For example, a JDTS service provider cannot offer unused capability to the WEIS Market from transmission service capability reserved but not being used by a non-participating transmission customer. If a transmission customer has a dynamic schedule using reserved transmission service on a TSP providing JDTS, the JDTS service provider cannot offer the "unused" portion of that dynamic schedule to the WEIS Market without express permission of the transmission customer.

1.2.11(c) – XES has general concerns about the oversight of this requirement and the timing necessary to prevent harm to non-participant entities.

Comments are highlighted below.

PROPOSED REVISION(S)

In the appropriate sections below, provide proposed revisions to the WEIS Revision Request for which you are providing comments. Use the language from the WEIS Revision Request Submission Form or the Recommendation Report, whichever is more recent.

1. *Open the document containing the language you would like to edit, e.g., WRR Submission Form or WRR Recommendation Report*
2. *Ensure Track Changes is turned off on both the forward looking protocols and this WRR Submission Form. Track Changes is located on Review tab above.*
3. *While in the document containing the language you are proposing edits to, select and copy the language you would like to edit*
4. *Paste the language to this Comment Form*
5. *Turn on Track Changes and make the edits you would like to propose*

WEIS Tariff

1.2.11 Transmission Availability for use by WEIS Market

(a) Unless otherwise prohibited by law, regulation or contract, Market Participants shall make available to SPP for purposes of operating the WEIS Market their:

- i. reserved but unused, transmission capability on transmission facilities located within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities;
- ii. transmission capability in accordance with agreements it has entered with third parties which permit the WEIS Market's use of third party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities;

~~Joint Dispatch Transmission Service on facilities within the participating Balancing Authority Area if the Market Participant is a Transmission Service Provider, as defined by North American Electric Reliability Corporation ("NERC"), administering transmission service within a participating Balancing Authority Area.~~

(b) Transmission Service Providers offering Joint Dispatch Transmission Service associated with the WEIS ("JDTS") within participating Balancing Authorities shall make available to SPP any the transmission capability in accordance with agreements it has entered with third parties which that has been expressly permitted for use by the WEIS Market. 's use of third party's transmission system within a participating Balancing Authority Area or on transmission facilities used to transfer energy between participating Balancing Authorities.

(c) Market Participants shall communicate and accurately represent to its Transmission Service Provider(s) and participating Balancing Authority and to SPP, its transmission capability described in Sections 1.2.11(a). Market Participants shall communicate to its participating Balancing Authority and SPP any changes to this information as soon as practicable but at least thirty (30) minutes before such changes become effective. Market Participants may

communicate this information to SPP through their participating Balancing Authority.

~~(a)~~(d) Transmission Service Providers offering JDTS within pP Participating Balancing Authorities shall provide to SPP data and information in accordance with the WEIS Market Protocols and approved WEIS business practices to facilitate the creation and maintenance of constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability in Sections 1.2.11(a) and (b).

~~(b)~~(e) Using the data and information provided by participating Balancing Authorities, SPP will create and maintain transmission constraints that ensure the WEIS Market's economic dispatch is constrained to the combined transmission capability described in Section 1.2.11(a) and (b).

4.3 Coordination of Market Operations under *Transmission Operations and SPP* Congestion Management

(1) SPP will incorporate the data *provided by* reliability coordinators, transmission service providers, and ~~transmission operators~~ participating Balancing Authorities for congestion management in the dispatch solution. This data includes:

- (a) Out-of-Merit Dispatch instructions
- (b) Binding transmission constraints
- (c) Changes in import and export transactions associated with the WEIS Market.

(2) SPP will continuously activate constraints in the SCED to constrain the least cost dispatch to the transmission capability made available for use in the WEIS Market in accordance with Section 1.2.11 of Attachment A of this Tariff. SPP will update these constraints as soon as practicable when information is received from Transmission Service Providers, Market Participants and participating Balancing Authorities regarding changes to the transmission capability that is available for use in the WEIS Market. SPP will maintain a list on its public website of the constraints activated in the SCED pursuant to this Section 4.3(2).

ATTACHMENT D JOINT DISPATCH TRANSMISSION SERVICE

Service pursuant to Attachment D to this Tariff shall be applicable to i) Joint Dispatch Transmission Service Providers that have provided within their open access transmission tariff, a transmission service schedule for energy dispatched at the rate specified in Schedule 2 of this Tariff for Joint Dispatch Transmission Service on an intra-hour non-firm, as-available basis with the lowest curtailment priority and ii) Joint Dispatch Transmission Service Customers receiving Energy Imbalance Service pursuant to

Schedule 1 to this Tariff.

Limited Joint Dispatch Transmission Service Provider Responsibilities. The Joint Dispatch Transmission Service Provider shall have the obligation to make available ~~the otherwise unused~~ the transmission capability specified in Section 1.2.11(a) of Attachment A ~~physical capability of its transmission system~~ for purposes of providing Joint Dispatch Transmission Service to support delivery of Imbalance Energy and to operate its transmission system in accordance with Good Utility Practice. For purposes of Joint Dispatch Transmission Service, the Joint Dispatch Transmission Service Provider shall have no obligation to plan, construct, or maintain its transmission system for the benefit of any Joint Dispatch Transmission Service Customer.

Restrictions on Use of Service. The Joint Dispatch Transmission Service Customer shall not use Joint Dispatch Transmission Service for (i) off-system sales of capacity or energy or (ii) direct or indirect provision of transmission service by the Joint Dispatch Transmission Service Customer to any third party. Joint Dispatch Transmission Service may be used only for receipt or delivery of energy dispatched within a Balancing Authority Area in the WEIS Market on an intra-hour, non-firm basis to serve wholesale or retail native load. Energy produced within a Resource's Operating Tolerance and in response to WEIS Market dispatch instruction is considered delivered utilizing Joint Dispatch Transmission Service.

Conditions Precedent for Receiving Service. Subject to the terms and conditions of this Attachment D of the Tariff, and related schedules and attachments, the Joint Dispatch Transmission Service Provider will provide Joint Dispatch Transmission Service to any Joint Dispatch Transmission Service Customer. Joint Dispatch Transmission Service is provided commensurate with energy dispatched within the WEIS Market pursuant to the provisions of this Tariff. As such, the Joint Dispatch Transmission Customer is not required to separately request or make application for Joint Dispatch Transmission Service. A Joint Dispatch Transmission Service Provider that also takes Joint Dispatch Transmission Service under a tariff agrees to provide comparable service that it is capable of providing to all Joint Dispatch Transmission Service Providers on similar terms and conditions over facilities used for the transmission of electric energy in interstate commerce owned, controlled or operated by Joint Dispatch Transmission Service Providers.

SOUTHWEST POWER POOL
Western Markets Executive Committee & Western Markets Working Group Joint
Meeting
September 2, 2020
Net-Conference

SUMMARY OF MOTIONS AND ACTION ITEMS

MOTIONS:

1. **Agenda Item 1 – Agenda**

WMEC Motion: Dan Walter (TSGT) motioned to approve the agenda. Tom Christensen (BEPC) provided the second. Motion carried unanimously.

2. **Agenda Item 2 – WRR6 WEIS Transmission Availability (Issue 1) WMWG Comments 082820**

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified. Valerie Weigel (BEPC) provided the second.

WMWG Motion: Mike Mason (TSGT) motioned to amend the motion to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified to include modifications made during the September 2nd, 2020 joint WMWG/WMEC meeting. Chris Powell (WAPA) provided the second. Motion carried unanimously.

WMWG Motion: Mike Mason (TSGT) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) SPP Comments 082720 as modified during the August 28th, 2020 joint WMWG/WMEC meeting and the September 2nd, 2020 joint WMWG/WMEC meeting. Valerie Weigel (BEPC) provided the second. Motion carried unanimously.

WMEC Motion: Clay MacArthur (Deseret) motioned to approve WRR6 (WEIS Transmission Availability (Issue 1)) as approved by the WMWG. Dan Walter (TSGT) provided the second. Motion carried unanimously.

ACTION ITEMS:

Action Item: SPP will create a WEIS Tariff definition for Market Operator and will use the historical NERC definition for Market Operator as guidance.

FUTURE MEETINGS AND TOPICS:

No future joint meetings are scheduled at this time.

Respectfully Submitted – Daniel Harless, WMWG Staff Secretary on behalf of David Kelley,
WMEC Staff Secretary