193 FERC ¶ 61,172
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Laura V. Swett, Chairman;
David Rosner, Lindsay S. See,
Judy W. Chang, and David LaCerte.

Southwest Power Pool, Inc. | Docket Nos. ER25-3105-000
ER25-3105-001

ORDER ACCEPTING TARIFF REVISIONS

(Issued November 28, 2025)

1. On August 7, 2025, as amended on September 29, 2025, pursuant to section 205 of the Federal Power Act (FPA)[1] and part 35 of the Commission's regulations,[2] Southwest Power Pool, Inc. (SPP) filed proposed revisions to Attachment V (Generator Interconnection Procedures (GIP)) of SPP's Open Access Transmission Tariff (Tariff) to outline the study requirements for performing a load assessment for electric storage resources that are subject to SPP's GIP.[3] As discussed below, we accept SPP's proposed Tariff revisions, effective October 7, 2025, as requested.[4]

I. Background

A. Order No. 2003

2. In Order No. 2003,[5] the Commission required public utilities that own, control, or operate transmission facilities to file standard generator interconnection procedures and a

[1] 16 U.S.C. § 824d.

[2] 18 C.F.R. pt. 35 (2025).

[3] Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Tariff.

[4] See Appendix for tariff records accepted in this order.

[5] *Standardization of Generator Interconnection Agreements & Procs.*, Order No. 2003, 104 FERC ¶ 61,103 (2003), *order on reh'g*, Order No. 2003-A, 106 FERC ¶ 61,220, *order on reh'g*, Order No. 2003-B, 109 FERC ¶ 61,287 (2004), *order on reh'g*,

standard agreement to provide interconnection service to generating facilities with a capacity greater than 20 MW. To this end, the Commission adopted the *pro forma* Large Generator Interconnection Procedures (LGIP) and *pro forma* Large Generator Interconnection Agreement (LGIA) and required all public utilities subject to Order No. 2003 to modify their tariffs to incorporate the *pro forma* LGIP and *pro forma* LGIA.[6]

3. The Commission permitted transmission providers to seek variations from the *pro forma* LGIP and *pro forma* LGIA if those variations were "consistent with or superior to" the terms of the *pro forma* LGIP and *pro forma* LGIA.[7] In addition, the Commission indicated that it would allow regional transmission organizations and independent system operators (RTO/ISO), such as SPP, to propose independent entity variations for pricing and non-pricing provisions, stating that RTOs/ISOs have different operating characteristics due to their sizes and locations and that an RTO/ISO is less likely to act in an unduly discriminatory manner than a transmission provider that is also a market participant.[8] The Commission found that RTOs/ISOs "shall therefore have greater flexibility to customize [their] interconnection procedures and agreements to fit regional needs."[9] Under the independent entity variation standard, an RTO/ISO must demonstrate that proposed revisions from the Commission's *pro forma* LGIP and *pro forma* LGIA are just and reasonable and not unduly discriminatory or preferential and accomplish the purposes of Order No. 2003.[10]

Order No. 2003-C, 111 FERC ¶ 61,401 (2005), *aff'd sub nom. Nat'l Ass'n of Regul. Util. Comm'rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007).

[6] Order No. 2003, 104 FERC ¶ 61,103 at PP 1-2.

[7] *Id.* PP 825-826. The Commission also permitted transmission providers to justify a variation from the *pro forma* LGIP or *pro forma* LGIA based on regional reliability requirements and required transmission providers to submit these regional reliability variations to the Commission for approval under the relevant reliability standard. *Id.* PP 824, 826.

[8] *Id.* P 827.

[9] *Id.*

[10] *See, e.g., Midcontinent Indep. Sys. Operator, Inc.*, 185 FERC ¶ 61,084, at P 11 (2023) (citing Order No. 2003, 104 FERC ¶ 61,103 at PP 26, 827).

B. Order No. 845

4. In Order No. 845,[11] the Commission amended the *pro forma* LGIP and the *pro forma* LGIA to improve certainty, promote more informed interconnection, and enhance interconnection processes.[12] As part of these reforms, the Commission modified the definition of "Generating Facility" in the *pro forma* LGIP and the *pro forma* LGIA to explicitly include electric storage resources and to allow electric storage resources to interconnect pursuant to Commission-jurisdictional large generator interconnection processes. The Commission found that the definitional change would reduce a potential barrier to large electric storage resources with a generating facility capacity above 20 MW that wish to interconnect pursuant to the terms in the *pro forma* LGIP and *pro forma* LGIA.[13]

C. Order No. 2023

5. In Order No. 2023,[14] the Commission further amended the Commission's *pro forma* LGIP and *pro forma* LGIA. The Commission adopted a comprehensive package of reforms, including reforms to incorporate technological advancements into the interconnection process. Pertinent to the instant proceeding, the Commission adopted a requirement that transmission providers, at the request of the interconnection customer, use operating assumptions in interconnection studies that reflect the proposed charging behavior of electric storage resources (whether standalone, co-located generating facilities, or part of a hybrid generating facility)—i.e., whether the interconnecting generating facility will or will not charge during peak load conditions—unless good utility practice, including applicable reliability standards, otherwise requires the use of different operating assumptions.[15]

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[11] *Reform of Generator Interconnection Procs. & Agreements*, Order No. 845, 163 FERC ¶ 61,043 (2018), *errata notice*, 167 FERC ¶ 61,123, *order on reh'g*, Order No. 845-A, 166 FERC ¶ 61,137, *errata notice*, 167 FERC ¶ 61,124, *order on reh'g*, Order No. 845-B, 168 FERC ¶ 61,092 (2019).

[12] Order No. 845, 163 FERC ¶ 61,043 at P 2.

[13] *Id.* P 275; *see pro forma* LGIP § 1 (Definitions).

[14] *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

[15] Order No. 2023, 184 FERC ¶ 61,054 at P 1509; *see also id.* PP 1509-1521 (revising sections 3.1.2, 3.2.1.2, 3.2.2.2, 3.3.1, 3.4.2, 4.4.3, 7.3, 8.2, and Appendix 1 of the *pro forma* LGIP and article 17.2 and Appendix H of the *pro forma* LGIA).

6. The Commission clarified that studying electric storage resources, at the request of the interconnection customer, according to their planned operating assumptions refers only to the operating assumptions for withdrawals of energy (e.g., the charging of an electric storage resource) in interconnection studies.[16] The Commission further clarified, however, that this reform does not require transmission providers to study charging as part of the interconnection process if they do not already do so.[17] The Commission also explained that variations from the Commission's requirements in Order No. 2023 would be reviewed under the same standard allowed by Order No. 2003.[18]

D. <u>SPP's Order No. 2023 Compliance Filing</u>

7. On May 16, 2024, SPP submitted proposed revisions to Attachment V of its Tariff to comply with the requirements of Order Nos. 2023 and 2023-A. In its compliance filing, SPP proposed not to adopt the Commission's *pro forma* LGIP and *pro forma* LGIA revisions (described above) related to the use of operating assumptions for electric storage resources. SPP explained that it was not adopting those *pro forma* provisions because, under its existing Tariff, it did not already evaluate the charging of electric storage resources as part of its interconnection process.[19] On June 26, 2025, the Commission accepted this aspect of SPP's compliance filing.[20]

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[16] *Id.* P 1524.

[17] *Id.* P 1526; *see also* Order No. 2023-A, 186 FERC ¶ 61,199 at P 585 (reiterating that, "if a transmission provider does not determine the network upgrades needed to accommodate the charging of an electric storage resource through the interconnection process (e.g., the transmission provider determines such upgrades as part of the transmission service request process), then the transmission provider must demonstrate on compliance why this reform does not apply to that particular transmission provider").

[18] Order No. 2023, 184 FERC ¶ 61,054 at P 1764 & n.3346.

[19] SPP, Compliance Filing, Docket No. ER24-2026-000, at 47-49 (filed May 16, 2024).

[20] *Sw. Power Pool, Inc.*, 191 FERC ¶ 61,230, at P 217 (2025) (finding that "the requirement that transmission providers use operating assumptions, at the request of the interconnection customer, in interconnection studies that reflect the proposed charging behavior of an electric storage resource does not apply to SPP because it does not study the charging of an electric storage resource through its interconnection process"). The Commission directed SPP to submit a further compliance filing with respect to other aspects of its proposal. *Id.* P 1. On August 25, 2025, SPP submitted its second compliance filing, which is pending with the Commission. *See* SPP, Compliance Filing, Docket No. ER24-2026-001 (filed Aug. 25, 2025).

II. **Filing**

8. SPP proposes Tariff revisions to establish a process for studying load associated with electric storage resources that are subject to its GIP. SPP argues that the proposed study process will allow SPP to maintain system reliability and comply with Order Nos. 845 and 2023 and the North American Electric Reliability Corporation's (NERC) Reliability Standard FAC-002 (Facility Interconnection Studies). SPP states that Order Nos. 845 and 2023 reduced barriers to the interconnection of electric storage resources pursuant to the Commission's *pro forma* LGIP and *pro forma* LGIA.[21] SPP contends that electric storage resources, as a form of generation, also fall within Reliability Standard FAC-002, which requires that entities coordinate and cooperate on studies assessing the reliability impact of interconnections of new or materially modified generation.[22]

9. Specifically, SPP proposes to add a new term—Electric Storage Resource Load Assessment (ESR-LA)—to the list of definitions in part I, section 1 of its Tariff,[23] section 1 (Definitions) of its GIP, and article 1 (Definitions) of its *pro forma* Generator Interconnection Agreements (GIA) and interim GIAs in GIP Appendices 6 (GIA), 8 (Interim GIA), 13, and 14.[24] SPP defines ESR-LA as:

> A study conducted by the Transmission Provider to evaluate the impacts of an Electric Storage Resource (ESR) withdrawing Energy from the Transmission System. The ESR-LA will consist of, but is not limited to, dynamic and voltage stability analyses in accordance with NERC Reliability Standards.

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[21] SPP August 7 Transmittal at 3-5 (citing Order No. 845, 163 FERC ¶ 61,043; Order No. 2023, 184 FERC ¶ 61,054 at PP 1510, 1526; Order No. 2023-A, 186 FERC ¶ 61,199 at P 576).

[22] SPP August 7 Transmittal at 5.

[23] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, pt. I, § 1 (Definitions E) (5.0.1).

[24] SPP September 29 Transmittal at 4 (citing SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 1 (Definitions) (19.0.2); *id.* attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0), art. 1 (Definitions); *id.* attach. V, app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0), art. 1 (Definitions); *id.* attach. V, app. 13 (24.1.0), art. 1 (Definitions); *id.* attach. V, app. 14 (23.1.0), art. 1 (Definitions)).

10. Further, SPP proposes to add a new paragraph to its GIP section 8.2 (Execution of Generator Interconnection Study Agreement) to revise the requirements for submitting an interconnection request. SPP states that the proposed revisions to GIP section 8.2 adopt the language in the Commission's *pro forma* LGIP section 3.4.2(v), with only minor deviations. Specifically, SPP states that, rather than require the interconnection customer to specify whether it will charge at peak load, the revisions to GIP section 8.2 will require the interconnection customer to provide the electric storage resource's "charging parameters."[25] SPP explains that it will not study electric storage resources at peak load, but rather will study all electric storage resources in off-peak conditions because it aligns with their expected charging behavior in real-time.[26] Consistent with the proposed revisions in GIP section 8.2, SPP also proposes revisions to GIP Appendix 3 (Generator Interconnection Study Agreement), Attachment B to require all interconnection requests that include electric storage resources to specify their proposed charging behavior and describe the control technologies (software and/or hardware) that will limit the operation of the generating facility to the submitted operating assumptions.[27] SPP asserts that the proposed deviations in both GIP section 8.2 and GIP Appendix 3 are just and reasonable and not unduly discriminatory or preferential, and accomplish the purposes of Order No. 2023 because they provide SPP with the information required to properly evaluate electric storage resources.[28]

11. SPP also proposes to add a new paragraph to GIP section 3.1.2 (Submission) stating that SPP must study electric storage resources at non-peak load using the operating assumptions requested by the interconnection customer, unless good utility practice, including applicable Reliability Standards, requires the use of different operating assumptions.[29] The proposed language further provides that such requests may

[25] *Id.* at 2 & n.9 (citing SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.2 (Execution of Generator Interconnection Study Agreement)). SPP notes that this proposed deviation is also consistent with the proposed revisions to GIP sections 3.1.2, 3.3, 4.4.3, and 8.10, described below. *See infra* PP 11-12, 14-15.

[26] SPP states that if an interconnection customer instead seeks to charge at peak load, it must obtain long-term service as described in SPP Business Practice 7250, section 5.5. SPP September 29 Transmittal at 2-3.

[27] *Id.* (citing SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, app. 3 (Generator Interconnection Study Agreement) (19.0.0), attach. B).

[28] *Id.* at 3.

[29] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 3 (Interconnection Requests) (26.0.0), § 3.1.2 (Submission).

also be subject to other studies at full generating facility capacity to ensure the system's safety and reliability and that the generating facility may be subject to additional control technologies and include testing and validation of the additional control technologies.[30] SPP asserts that these proposed revisions to section 3.1.2 are just and reasonable because the revisions track nearly verbatim the Commission's *pro forma* LGIP language.[31]

12. SPP states, however, that the proposed revisions to GIP section 3.1.2 omit other *pro forma* LGIP language specifying that, if the transmission provider finds that the requested operating assumptions conflict with good utility practice, the transmission provider must provide a written explanation of why the operating assumptions are insufficient or inappropriate no later than 30 calendar days before the end of the Customer Engagement Window and allow the interconnection customer to revise and resubmit operating assumptions one time at least 10 calendar days before the end of the Customer Engagement Window.[32] SPP argues that it is unnecessary to include this additional *pro forma* LGIP language because GIP section 8.3 ([Definitive Interconnection System Impact Study (DISIS)] Review Period) already requires SPP to notify an interconnection customer of deficiencies in its interconnection request and provides a time period for the interconnection customer to submit a revised request.[33] However, to align with the Commission's *pro forma* LGIP section 3.1.2, SPP proposes to revise GIP section 8.3 to require SPP to notify interconnection customers, in writing, of any deficiencies in the interconnection request.[34]

13. In addition, SPP proposes to revise GIP sections 3.2.1.2 (The Study) and 3.2.2.2 (The Study) to require SPP to study electric storage resources for Energy Resource Interconnection Service and Network Resource Interconnection Service, respectively,

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[30] *Id.*

[31] SPP August 7 Transmittal at 6 (citing *pro forma* LGIP § 3.1.2).

[32] *Id.* at 6-7 (citing *pro forma* LGIP § 3.1.2).

[33] *Id.* at 7 (citing SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (22.0.0), § 8.3 (DISIS Review Period) (providing, in relevant part, that SPP must notify the interconnection customer of any deficiencies in its interconnection request that would warrant removal from the queue and that an interconnection customer will have 15 business days from the notice to cure any deficiencies)).

[34] SPP September 29 Transmittal at 4 (citing SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.3 (DISIS Review Period)).

according to the interconnection customer's requested operating assumptions.[35] SPP asserts that these proposed revisions are just and reasonable because they adopt, without modification, the Commission's *pro forma* LGIP language.[36]

14. SPP also proposes to add language to GIP sections 3.3 (Utilization of Surplus Interconnection Service) and 4.4.3 to require SPP to study electric storage resources at non-peak load, using the interconnection customer's requested operating assumptions, as part of the surplus interconnection service process and material modification process, respectively.[37] SPP argues that the proposed revisions are just and reasonable because they track the Commission's *pro forma* LGIP language requiring transmission providers to use operating assumptions that reflect an electric storage resource's proposed charging behavior in those studies.[38]

15. Similarly, SPP proposes to revise GIP section 8.10 (Scope of Interconnection Facilities Study) to provide that the interconnection facilities study will identify any potential control equipment for requests to study an electric storage resource at non-peak load using the interconnection customer's requested operating assumptions.[39] SPP states that, unlike the *pro forma* LGIP, SPP proposes to analyze the charging of the electric storage resource during the interconnection facilities study phase of the study process—and not during the DISIS phase—because network upgrades assigned during the DISIS phase may be needed to increase available capacity on the transmission system to support the electric storage resource's charging activities. SPP states that it is not proposing to assign network upgrades to accommodate the charging of the electric storage resource; rather, SPP will establish a charging limit for the resource, representing the amount of change in MWs that can be accommodated without requiring network upgrades.
SPP asserts, therefore, that providing the interconnection customer with this information during the interconnection facilities study phase of the study process should not negatively affect an interconnection customer's ability to make timely decisions about its

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[35] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 3 (Interconnection Requests) (26.0.0), §§ 3.2.1.2 (The Study), 3.2.2.2 (The Study).

[36] SPP August 7 Transmittal at 9-10.

[37] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 3 (Interconnection Requests) (26.0.0), § 3.3 (Utilization of Surplus Interconnection Service); *id.* attach. V, § 4 (Interconnection Request Evaluation Process) (12.0.0), § 4.4.3.

[38] SPP August 7 Transmittal at 10-11.

[39] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.10 (Scope of Interconnection Facilities Study).

project. According to SPP, these revisions meet the independent entity variation standard because SPP is taking the necessary steps to evaluate the charging behavior of electric storage resources but proposes doing so at a different point in the study process.[40]

16. SPP also proposes to add a new Appendix H to GIP Appendices 6, 8, 13, and 14 to set forth the parameters for interconnecting electric storage resources.[41] SPP explains that the first two proposed paragraphs in new Appendix H provide a location for an interconnection customer to memorialize its operating assumptions. SPP states that the two opening paragraphs adopt without modification the Commission's *pro forma* LGIA language set forth in Order No. 2023.[42]

17. SPP explains that the third proposed paragraph in Appendix H limits an interconnection customer's specific off-peak energy withdrawal to the value (in MW) determined by the ESR-LA report because, SPP argues, there is no single, fixed value for all cases. SPP contends that this proposed provision enables SPP to ensure adherence to applicable reliability standards. Relatedly, the fourth proposed paragraph in Appendix H states that the interconnection customer may remove this withdrawal limit pursuant to SPP's Business Practice 7250.[43] SPP explains that, under Business Practice 7250,[44] an interconnection customer may override limitations identified in the ESR-LA by using the SPP Sponsored Upgrade process or by seeking Long-Term Service. According to SPP,

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[40] SPP September 29 Transmittal at 5.

[41] Appendices 13 and 14 contain SPP's *pro forma* GIA and *pro forma* Interim GIA, respectively, for use when Western Area Power Administration-Upper Great Plains Region is the transmission owner party to the GIA.

[42] SPP August 7 Transmittal at 13-14.

[43] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 13 (24.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 14 (23.1.0), app. H (Operating Assumptions for Generating Facility).

[44] SPP states that it is revising Business Practice 7250 (SPP's generator interconnection manual) in conjunction with the instant filing. SPP August 7 Transmittal at 15. SPP's revisions to Business Practice 7250 are not part of this filing.

either of those options—Sponsored Upgrades or Long-Term Service—would mitigate any reliability risk posed by overriding a limitation identified in an ESR-LA.[45]

18. SPP states that the fifth proposed paragraph in Appendix H gives SPP discretion to give a dispatch instruction that exceeds the withdrawal limits set forth in the GIA, if necessary for reliability or balancing purposes. SPP explains, however, that this provision also makes clear that an interconnection customer may not otherwise exceed the limitations identified by the ESR-LA, because doing so could have negative effects on the transmission system.[46]

19. The sixth and final proposed paragraph in Appendix H states that, in the event SPP provides a dispatch instruction to the interconnection customer to charge the generating facility batteries, the required energy must be taken at wholesale from the transmission system. The proposed paragraph further states that, in any event, the interconnection customer will not engage in "Self-Charging"[47] of the generating facility batteries unless the interconnection customer first obtains transmission service pursuant to the Tariff. The proposed paragraph adds that any power and energy discharged from the generating facility batteries must also be delivered at wholesale to the transmission system. SPP argues that this proposed paragraph is just and reasonable because it reflects existing rules under the Tariff requiring that: (1) electric storage resources be paid when dispatched, just like any other resource; (2) electric storage resources not engage in

[45] SPP August 7 Transmittal at 15.

[46] *Id.* at 15-16.

[47] As defined in the Tariff, "Self-Charging" is that which "[o]ccurs when [a Market Storage Resource] clears Energy withdrawals in the Day-Ahead Market or withdraws Energy in Real-Time from the Transmission System without providing a market service as described in Section 2.17.1 of this Attachment AE." SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. AE, § 1.1 (Definitions S) (14.0.0). Section 2.17.1 of Attachment AE, in turn, distinguishes between when a Market Storage Resource provides a market service and when it is Self-Charging. Market Storage Resources are subject to transmission charges when Self-Charging (as opposed to when they are providing a market service). *See* SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. AE, § 2.17 (Electric Storage Resource) (2.0.0); *id.* § 2.17.1 (Self-Charging MSRs) (0.0.0); *see also Sw. Power Pool, Inc.*, 190 FERC ¶ 61,009, at P 29 & n.51 (2025).

Self-Charging unless they obtain transmission service (as set forth in section 2.17 of Attachment AE of the Tariff); and (3) energy discharged be delivered at wholesale to the transmission system.[48]

20. Moreover, SPP proposes to add article 17.2 (Violation of Operating Assumptions for Generating Facilities) to its *pro forma* GIAs and Interim GIAs in GIP Appendices 6, 8, 13, and 14, as required in Order No. 2023.[49] Consistent with the Commission's *pro forma* LGIA, SPP's proposed article 17.2 states that SPP may consider an interconnection customer to be in breach of the GIA if the interconnection customer fails to operate its electric storage resource in accordance with the operating assumptions memorialized in Appendix H.[50]

21. Lastly, SPP proposes revisions to GIP section 5.1.1 to specify that the GIP revisions proposed in this proceeding will apply to interconnection requests submitted during the first DISIS Queue Cluster Window to open after June 26, 2025 and all subsequent clusters. In addition, SPP proposes to revise GIP section 5.1.2 to specify that the GIP revisions proposed in this proceeding will also apply to interconnection requests submitted in the DISIS-2024-001 Queue Cluster Window. SPP asserts that these revisions add clarity by specifying which interconnection requests submitted in DISIS Queue Cluster Windows will be subject to the GIP provisions filed in this proceeding.[51] SPP also proposes to add a provision to GIP section 5.1.2 to clarify that interconnection requests submitted in the DISIS-2024-001 Queue Cluster Window are not required to submit a new Generator Interconnection Study Agreement. SPP asserts that, because this cluster window is already closed and all interconnection customers in that cluster study have already submitted a Generator Interconnection Study Agreement that specifies charging parameters and control technologies for electric storage resources, the proposed

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[48] SPP August 7 Transmittal at 16-17.

[49] SPP September 29 Transmittal at 4.

[50] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0), art. 17.2 (Violation of Operating Assumptions for Generating Facilities); *id.* attach. V, app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0), art. 17.2 (Violation of Operating Assumptions for Generating Facilities); *id.* attach. V, app. 13 (24.1.0), art. 17.2 (Violation of Operating Assumptions for Generating Facilities); *id.* attach. V, app. 14 (23.1.0), art. 17.2 (Violation of Operating Assumptions for Generating Facilities).

[51] SPP August 7 Transmittal at 17-18.

revision avoids the administrative burden of requiring a new Generator Interconnection Study Agreement for interconnection requests included in this cluster.[52]

III. Notice of Filings and Responsive Pleadings

22. Notice of SPP's initial filing was published in the *Federal Register*, 90 Fed. Reg. 38779 (Aug. 12, 2025), with interventions and protests due on or before August 28, 2025.

23. Timely motions to intervene were filed by: American Electric Power Service Corporation, on behalf of its affiliates Public Service Company of Oklahoma, Southwestern Electric Power Company, AEP Oklahoma Transmission Company, Inc., and AEP Southwestern Transmission Company, Inc.; Calpine Corporation; Gridstor LLC; NextEra Energy Resources, LLC; Oklahoma Gas & Electric Company; Omaha Public Power District; Sunflower Electric Power Corporation; and Western Farmers Electric Cooperative.

24. Notice of SPP's amended filing was published in the *Federal Register*, 90 Fed. Reg. 47746 (Oct. 2, 2025), with interventions and protests due on or before October 20, 2025. None was filed.

IV. Discussion

A. Procedural Matters

25. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2025), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

B. Substantive Matters

26. For the reasons discussed below, we accept SPP's proposed Tariff revisions, effective October 7, 2025, as requested.

27. As an initial matter, because SPP's proposed revisions to GIP sections 3.2.1.2 and 3.2.2.2, as well as article 17.2 in GIP appendices 6, 8, 13, and 14, incorporate without modification the Commission's *pro forma* LGIP language adopted in Order Nos. 2023 and 2023-A,[53] we find that the proposed revisions are just and reasonable and not unduly discriminatory or preferential.

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[52] SPP September 29 Transmittal at 3-4.

[53] *See pro forma* LGIP §§ 3.2.1.2, 3.2.2.2; *pro forma* LGIA art. 17.2.

28. The remainder of SPP's proposed Tariff revisions include deviations from the Commission's *pro forma* LGIP and *pro forma* LGIA. As noted above, the Commission applies an independent entity variation standard to evaluate RTO/ISO proposals for deviations from the Commission's *pro forma* LGIP and *pro forma* LGIA established in Order Nos. 2003,[54] 845,[55] and 2023.[56] Under the independent entity variation standard, SPP must demonstrate that its proposed variations are just and reasonable and not unduly discriminatory or preferential and accomplish the purposes of the Commission's final rules on generator interconnection, including, as relevant here, Order Nos. 845 and 2023.[57] As discussed further below, we find that SPP's proposed Tariff revisions that deviate from the Commission's *pro forma* LGIP and *pro forma* LGIA are just and reasonable and not unduly discriminatory or preferential and accomplish the purposes of Order Nos. 845 and 2023.

29. SPP proposes to revise part I, section 1 of the Tariff to define a new term, ESR-LA, as a study to evaluate the impacts of an electric storage resource withdrawing energy from the transmission system, consisting of, but not limited to, dynamic and voltage stability analyses in accordance with NERC Reliability Standards.[58] SPP also proposes revisions to incorporate this new definition into its GIP and *pro forma* GIAs.[59] We find that the proposed revisions are just and reasonable and not unduly discriminatory

[54] Order No. 2003, 104 FERC ¶ 61,103 at P 827.

[55] Order No. 845, 163 FERC ¶ 61,043 at P 43.

[56] Order No. 2023, 184 FERC ¶ 61,054 at P 1764 & n.3346.

[57] *See, e.g.*, *Sw. Power Pool, Inc.*, 183 FERC ¶ 61,215, at P 30 (2023) ("Under the independent entity variation standard, SPP must demonstrate that its proposed variations are just and reasonable and not unduly discriminatory or preferential, and accomplish the purposes of the Commission's rulemakings establishing the *pro forma* generator interconnection procedures and agreements.").

[58] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, pt. I, § 1 (Definitions E) (5.0.1).

[59] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 1 (Definitions) (19.0.2); *id.* attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0), art. 1 (Definitions); *id.* attach. V, app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0), art. 1 (Definitions); *id.* attach. V, app. 13 (24.1.0), art. 1 (Definitions); *id.* attach. V, app. 14 (23.1.0), art. 1 (Definitions).

or preferential because they identify and define a new study process that will help facilitate the reliable interconnection of new electric storage resources to SPP's transmission system.[60]

30. We find that SPP's proposed revisions to GIP sections 3.1.2, 3.3, 4.4.3, 8.2, and 8.10 and Appendix 3 are also just and reasonable and not unduly discriminatory or preferential because the proposed revisions largely adopt the Commission's *pro forma* LGIP language, with some modifications.[61] Similar to the *pro forma* LGIP requirements adopted in Order No. 2023, SPP proposes revisions to require an interconnection customer to provide SPP with its electric storage resource's proposed charging parameters, together with any control technologies that will limit its operation to the proposed operating assumptions, in order to allow SPP to appropriately evaluate electric storage resources' charging activities and their effects on the transmission system. In describing the operating assumptions used in studies, SPP's proposed revisions specify that SPP will study an electric storage resource only under off-peak conditions and then assess whether any charging limitations must be imposed on that resource. We find SPP's proposed operating assumption provisions to be just and reasonable because studying the resources under off-peak conditions is based on the resource's expected real-time charging behavior, and any charging limitations will be based on the available capacity of the transmission system. Further, although SPP proposes to omit from its GIP section 3.1.2 the Commission's *pro forma* LGIP language concerning an interconnection customer's opportunity to cure insufficient or inappropriate operating assumptions within a certain period of time,[62] SPP's existing GIP already includes substantively similar

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[60] *See pro forma* LGIP § 3.1.2 ("Transmission Provider shall have *a process in place to study* Generating Facilities that include at least one electric storage resource using operating assumptions . . . that reflect the proposed charging behavior of the Generating Facility as requested by Interconnection Customer.") (emphasis added).

[61] *See* SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 3 (Interconnection Requests) (26.0.0), § 3.1.2 (Submission); *id.* attach. V, § 3 (Interconnection Requests) (26.0.0), § 3.3 (Utilization of Surplus Interconnection Service); *id.* attach. V, § 4 (Interconnection Request Evaluation Process) (12.0.0), § 4.4.3; *id.* attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.2 (Execution of Generator Interconnection Study Agreement); *id.* attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.10 (Scope of Interconnection Facilities Study); *pro forma* LGIP §§ 3.1.2, 3.3.1, 3.4.2, 4.4.3, 8.2; *id.* app. 1.

[62] *Pro forma* LGIP § 3.1.2 (stating, in relevant part, that "[i]f Transmission Provider finds Interconnection Customer's requested operating assumptions conflict with Good Utility Practice, Transmission Provider must provide Interconnection Customer an explanation in writing of why the submitted operating assumptions are insufficient or inappropriate by no later than thirty (30) Calendar Days before the end of the Customer

language in section 8.3.[63] In addition, to better align with the Commission's *pro forma* LGIP, SPP proposes to add language to its GIP section 8.3 to require "written" notification of any deficiencies in an interconnection customer's request.[64] Therefore, we find that, as revised, the Tariff language in GIP section 8.3 gives interconnection customers a reasonable opportunity to resolve any deficiencies in their requested operating assumptions for an electric storage resource.

31. Additionally, we find that SPP's proposed revisions to GIP sections 5.1.1 and 5.1.2 are just and reasonable and not unduly discriminatory or preferential because the revisions specify that the new provisions proposed in this filing regarding the use of electric storage resource operating assumptions will apply to those interconnection requests submitted in the DISIS-2024-001 Queue Cluster Window and all subsequent clusters.[65] We find that these revisions are just and reasonable and not unduly discriminatory or preferential because they provide greater certainty for future and pending interconnection requests about the applicability of these reforms.

32. We further find that SPP's proposed revisions to Appendix H in GIP Appendices 6, 8, 13, and 14 are just and reasonable and not unduly discriminatory or preferential because they provide a location for the interconnection customer to memorialize its operating

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Engagement Window and allow Interconnection Customer to revise and resubmit requested operating assumptions one time at least ten (10) Calendar Days prior to the end of the Customer Engagement Window.").

[63] *See* SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (22.0.0), § 8.3 (DISIS Review Period) ("During the DISIS Review Period, the Transmission Provider will validate Interconnection Requests. The Transmission Provider shall notify the Interconnection Customer of any deficiencies that would warrant removal from the DISIS Queue. Interconnection Customer shall have fifteen (15) Business Days from the date of the notice to cure any deficiencies, which may extend beyond the DISIS Review Period."); *see also id.* attach. V, § 1 (Definitions) (19.0.2) (defining "DISIS Review Period" as the "period following the close of the Definitive Interconnection System Impact Study Queue Cluster Window to resolve any deficiencies in the Interconnection Requests received during the Definitive Interconnection System Impact Study Queue Cluster Window.").

[64] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 8 (Definitive Planning Phase) (23.1.0), § 8.3 (DISIS Review Period).

[65] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 5 (Procedures for Interconnection Requests Submitted Prior to Effective Date of Generator Interconnection Procedures) (14.1.0), §§ 5.1.1, 5.1.2.

assumptions,[66] consistent with the Commission's *pro forma* LGIA. The new Appendix H also includes additional proposed language that: (1) limits an interconnection customer's specific off-peak energy withdrawal; (2) identifies the specific method (as further detailed in SPP's Business Practices) by which an interconnection customer may exceed that withdrawal limit; and (3) affords SPP discretion, as necessary, to exceed the electric storage resource's withdrawal limits through dispatch instructions but otherwise requires the interconnection customer to adhere to those limits (as identified in the ESR-LA). We find that these additional provisions are just and reasonable and not unduly discriminatory or preferential because they will help ensure that interconnection customers operate their electric storage resources within their studied limits and will mitigate potential negative impacts that the electric storage resources may have on SPP's transmission system. In addition, SPP proposes to include language in Appendix H stating that electric storage resources will take energy for charging at wholesale, will not engage in Self-Charging without obtaining the requisite transmission service, and will deliver any discharged energy at wholesale. We find that these further provisions are just and reasonable and not unduly discriminatory or preferential because they provide additional clarity in the GIA and are consistent with existing requirements elsewhere in the Tariff.[67]

33. Finally, we find that SPP's proposed deviations from the Commission's *pro forma* LGIP and *pro forma* LGIA, discussed above,[68] accomplish the purposes of Order

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[66] SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 13 (24.1.0), app. H (Operating Assumptions for Generating Facility); *id.* app. 14 (23.1.0), app. H (Operating Assumptions for Generating Facility).

[67] *See* SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. AE, § 2.17 (Electric Storage Resource) (2.0.0); *id.* attach. AE, § 2.17.1 (Self-Charging MSRs) (0.0.0).

[68] *See* SPP, Open Access Transmission Tariff, Sixth Revised Volume No. 1, pt. I, § 1 (Definitions E) (5.0.1); *id.* attach. V, § 1 (Definitions) (19.0.2); *id.* attach. V, § 3 (Interconnection Requests) (26.0.0), §§ 3.1.2 (Submission), 3.3 (Utilization of Surplus Interconnection Service); *id.* attach. V, § 4 (Interconnection Request Evaluation Process) (12.0.0), § 4.4.3; *id.* attach. V, § 5 (Procedures for Interconnection Requests Submitted Prior to Effective Date of Generator Interconnection Procedures) (14.1.0), §§ 5.1.1, 5.1.2; *id.* attach. V, § 8 (Definitive Planning Phase) (23.1.0), §§ 8.2 (Execution of Generator Interconnection Study Agreement), 8.10 (Scope of Interconnection Facilities Study); *id.* attach. V, app. 6 (Generator Interconnection Agreement (GIA)) (28.1.0); *id.* attach. V,

Nos. 845 and 2023 because the use of appropriate operating assumptions should result in more accurate study results for electric storage resources and avoid overestimating their impact on the transmission system, thereby reducing undue barriers to their development and promoting greater competition in the wholesale market.[69] We find, moreover, that the newly proposed Appendix H, in particular, will help ensure that new electric storage resources adhere to the applicable operating assumptions and, thus, interconnect reliably.[70]

<u>The Commission orders</u>:

SPP's filing is hereby accepted, effective October 7, 2025, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Carlos D. Clay,
Deputy Secretary.

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app. 8 (Interim Generator Interconnection Agreement (Interim GIA)) (25.1.0); *id.* attach. V, app. 13 (24.1.0); *id.* attach. V, app. 14 (23.1.0).

[69] *See* Order No. 2023, 184 FERC ¶ 61,054 at PP 1, 1510; Order No. 2023-A, 186 FERC ¶ 61,199 at P 576; Order No. 845, 163 FERC ¶ 61,043 at PP 2, 275.

[70] *See* Order No. 2023, 184 FERC ¶ 61,054 at P 1522.

Appendix – Tariff Records

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

- Definitions E, 1 Definitions E (5.0.1)
- Attachment V Section 1, Attachment V Section 1 (19.0.2)
- Attachment V Section 3, Attachment V Section 3 (26.0.0)
- Attachment V Section 4, Attachment V Section 4 (12.0.0)
- Attachment V Section 5, Attachment V Section 5 (14.1.0)
- Attachment V Section 8, Attachment V Section 8 (23.1.0)
- Attachment V Appendix 3, Attachment V Appendix 3 (19.0.0)
- Att. V Appendix 6, Attachment V Appendix 6 Generator Interconnection Agreement (28.1.0)
- Attachment V Appendix 8, Attachment V Appendix 8 Interim Generator Interconnection... (25.1.0)
- Attachment V Appendix 13, Attachment V Appendix 13 (24.1.0)
- Attachment V Appendix 14, Attachment V Appendix 14 (23.1.0)

Document Content(s)