

## **Transition of Integrated System (IS) Interconnection Request to SPP Tariff**

On December 10, 2014, Southwest Power Pool, Inc. (“SPP”) submitted its compliance filing in response to the Federal Energy Regulatory Commission’s (“Commission”) November 10, 2014 order issued in Docket No. ER14-2850<sup>1</sup> related to the integration of the Integrated Systems into SPP.<sup>2</sup> In the November 10 Order, the Commission directed SPP to provide information detailing the transition process for its generator interconnection study process, among other things. SPP provided the following information related to the transition.<sup>3</sup> In addition, SPP proposed revisions to Section 5 of Attachment V to specify the application of SPP’s Generator Interconnection Procedures (“GIP”) to Interconnection Requests transferring to SPP from Western-UGP.<sup>4</sup>

The application of SPP’s GIP to Interconnection Requests transferring from Western-UGP will depend on upon which stage of the process the Interconnection Request has progressed to, as described below.<sup>5</sup> Under the process outlined in the GIP, SPP’s open window for the Generator Interconnection (“GI”) queues will close on September 30, 2015. In order to allow Interconnection Requests in the Western-UGP’s GI queue to participate in SPP’s GI studies commencing on October 1, 2015, SPP will post notification on OASIS that the study windows scheduled to close on September 30, 2015 will be extended for an additional 15 Business Days in accordance with Section 4.2.4 of the GIP.

### **1. Interconnection Requests Without Executed Western-UGP Interconnection Study Agreement**

Any Interconnection Request in Western-UGP’s GI queue without an executed Western-UGP Interconnection Study Agreement of any kind as of the close of business on September 30, 2015 shall transition to the SPP GIP and meet the applicable GIP requirements within 15 Business Days after the integration of the IS into SPP (by October 22, 2015 based upon an October 1, 2015 integration date). These Interconnection Requests may be entered into either into the SPP Interconnection Feasibility Study Queue,<sup>6</sup> Preliminary Interconnection System Impact Study (“PISIS”) Queue,<sup>7</sup> or Definitive Interconnection System Impact Study (“DISIS”)

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<sup>1</sup> *Sw. Power Pool, Inc.*, 149 FERC ¶ 61,113 (2014) (“November 10 Order”).

<sup>2</sup> Compliance Filing of Southwest Power Pool, Inc., Docket No. ER14-2850-002 (Dec. 10, 2014) (“Compliance Filing”).

<sup>3</sup> In the Compliance Filing, SPP and Western-UGP agreed to provide notice to all affected Western-UGP Interconnection Customers of the requirements for the transition process. The information will also be posted on both the SPP and Western-UGP websites.

<sup>4</sup> See Proposed Tariff at Attachment V, Section 5.1.3.1.

<sup>5</sup> The transition proposed herein is similar to the transition process accepted by the Commission in SPP’s most recent revisions to its GIP in Docket No. ER14-781-000, *et. seq.* See *Sw. Power Pool, Inc.*, 147 FERC ¶ 61,201 (2014); *see also* Compliance Filing of Southwest Power Pool, Inc., Docket No. ER14-781-003 (July 14, 2014).

<sup>6</sup> FCS-2015-004 is scheduled to complete by December 31, 2015.

<sup>7</sup> PISIS-2015-002 is scheduled to complete by February 28, 2016.

Queue<sup>8</sup> for the study that begins October 1, 2015, provided they meet the 15 Business Day deadline for transitioning into the Tariff. Each Interconnection Request entered into one of the studies listed above will be required to meet the requirements applicable to the respective study.<sup>2</sup>

For this category of Interconnection Requests, SPP determined that the 15 Business Day transition period is appropriate since these Interconnection Requests are in the early stages of the interconnection process. Given that the IS Parties' integration date coincides with the start of an SPP study window, proposing a transition period longer than 15 Business Days would not allow SPP to be able to process all previous SPP Interconnection Requests in the October 1, 2015 study windows in a timely fashion and the completion of the studies would be delayed.

## **2. Interconnection Requests With Executed Western-UGP Interconnection Feasibility Study Agreements**

For any Interconnection Request with an executed Western-UGP Interconnection Feasibility Study ("IFS") Agreement as of the close of business on September 30, 2015, where the final Western-UGP IFS report has not been completed, the IFS will be completed by Western-UGP under the terms of the Western-UGP IFS Agreement and the Interconnection Request shall be considered to be in the SPP Interconnection Feasibility Study Queue. Upon issuance of the final Western-UGP IFS report by Western-UGP, the Interconnection Request shall be considered to be fully transitioned under the SPP GIP requirements, and SPP will tender a PISIS Agreement to the Interconnection Customer. Alternatively, the Interconnection Customer will have the option to move into the DISIS and may request to be tendered a DISIS Agreement.

Interconnection Customers with executed Western-UGP IFS Agreements where the final IFS report is not complete as of the close of business on September 30, 2015, will have the option to terminate the Western-UGP IFS Agreement(s) and to enter such Interconnection Request(s) into any of the SPP GI study queues that close September 30, 2015.<sup>10</sup> Any Interconnection Request exercising this option shall be required to transition to the SPP GIP within 15 Business Days as discussed in Section 1 above.

## **3. Interconnection Requests with Executed Western-UGP Interconnection System Impact Study Agreements**

For any Interconnection Request with an executed Western-UGP Interconnection System Impact Study ("ISIS") Agreement as of the close of business on September 30, 2015, where the final ISIS report has not been completed, Western-UGP will complete the ISIS under the terms of the ISIS Agreement. In order to maintain a valid Interconnection Request under the SPP GIP

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<sup>8</sup> DISIS-2015-002 is scheduled to complete by January 31, 2016.

<sup>2</sup> See Sections 6, 7 and 8 of Attachment V to the SPP Tariff.

<sup>10</sup> Based on SPP's GIP that assigns queue priority to Interconnection Requests once they enter the Interconnection Facilities Study Queue (GIP Section 4.1.3), the Interconnection Customer may choose this option if it determines that it may be able to reach the Interconnection Facilities Study Queue and obtain an Interconnection Queue Position in a more expedient manner rather than maintaining its current study agreement arrangements with Western-UGP.

and to be included in the SPP DISIS, the Interconnection Customer is required to meet the security deposit requirements in Section 8.2 of the GIP within 60 calendar days from the transition. The Interconnection Customer's queue priority will be based on its entry into the SPP Interconnection Facilities Study Queue in accordance with Section 4.1.3 of the GIP.

Upon issuance of the final ISIS report by Western-UGP, the Interconnection Request shall be considered to be fully transitioned under the SPP GIP requirements, and SPP will tender an Interconnection Facilities Study Agreement to the Interconnection Customer. Interconnection Customers with executed Western-UGP ISIS Agreements where the final ISIS report is not complete as of the close of business on September 30, 2015, will have the option to terminate the ISIS Agreement(s) and to enter such Interconnection Request(s) into any of the SPP GI study queues that close September 30, 2015.<sup>11</sup> Any Interconnection Request exercising this option shall be required to transition to the SPP GIP within 15 Business Days as discussed in Section 1 above.

#### **4. Interconnection Requests with Executed Western-UGP Interconnection Facilities Study Agreements**

For any Western-UGP Interconnection Request with an executed Western-UGP Interconnection Facilities Study Agreement as of the close of business on September 30, 2015, where the final Western-UGP Interconnection Facilities Study report has not been completed, Western-UGP will complete the Interconnection Facilities Study under the terms of the Western-UGP Interconnection Facilities Study Agreement.

In order to maintain a valid Interconnection Request under the SPP GIP and to be included in the Interconnection Facilities Study Queue, the Interconnection Customer will be required to meet the security deposit requirements in Sections 8.2 and 8.9 of GIP within 60 calendar days from the transition. The Interconnection Customer's queue priority for cost assignment purposes will be based its queue position within the Western-UGP GI Queue provided it makes the required payments within 60 calendar days.

Upon issuance of the final Western-UGP Interconnection Facilities Study report by Western-UGP, the Interconnection Request shall be considered to fully transitioned to the SPP GIP and SPP will tender a GIA to the Customer in accordance with Section 11 of the GIP.

#### **5. Interconnection Requests with Completed Western-UGP Interconnection Facilities Studies**

For any Western-UGP Interconnection Request where the Interconnection Customer has received the final Western-UGP Interconnection Facilities Study report but does not have an executed Western-UGP Generator Interconnection Agreement at the close of business on

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<sup>11</sup> *Id.*

September 30, 2015, SPP will tender a GIA to the Interconnection Customer in accordance with Section 11 of the GIP.

## **6. Proposed Tariff Revisions**

Due to the nature of the GI study process, the transition of the GI queue will vary depending upon the status of each Interconnection Request. As a result, SPP determined that the applicability of the transition process should be specified in the GIP. Accordingly, SPP proposes to add a new Section 5.1.3.1 to Attachment V of the SPP Tariff to reflect the transition of the Interconnection Requests in the Western-UGP GI queue to the SPP GI queue described above. The transition described herein and in the proposed Section 5.1.3.1 of Attachment V is based upon the transition to the revised GIP accepted by the Commission in Docket No. ER14-781-000, *et. seq.*<sup>12</sup>

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<sup>12</sup> See supra n. 4.