

December 1, 2009

VIA HAND DELIVERY

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Southwest Power Pool, Inc.*, Docket No. ER10-_____
Submission of Revisions to Open Access Transmission Tariff to
Incorporate Resident Load Reporting Deadline

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35 of the regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"), 18 C.F.R. § 35, Southwest Power Pool, Inc. ("SPP"), as authorized by its independent Board of Directors, proposes to revise its Open Access Transmission Tariff ("OATT" or "Tariff") to incorporate a deadline for entities to report their Resident Load¹ to SPP. SPP requests an effective date of January 1, 2010 for these Tariff modifications. In support, SPP states the following:

¹ As discussed below, Resident Load under the SPP Tariff is classified as customers taking network transmission service to serve their network load, as well as bundled retail load and load being served under Grandfathered Agreements. As further discussed below, Resident Load is used by SPP to determine Base Plan Zonal Charges and Region-wide Charges.

I. Background

SPP is a Commission-approved Regional Transmission Organization (“RTO”). It is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP currently has 54 members serving more than 5 million customers and covering a geographic area of 370,000 square miles. SPP’s current membership consists of 12 investor-owned utilities, 9 municipal systems, 11 generation and transmission cooperatives, 4 state authorities, 5 independent power producers, 10 power marketers, and 3 independent transmission companies.

As a RTO, SPP is a transmission provider administering transmission service over portions of Arkansas, Kansas, Louisiana, Missouri, Nebraska, New Mexico, Oklahoma, and Texas.

II. SPP Stakeholder Process and Approval of Proposed Tariff Revisions

In this filing, SPP proposes to revise its Tariff to incorporate a deadline for entities to report the load used by SPP to calculate Base Plan Zonal Charges and Region-wide Charges. These revisions originated within SPP’s Regional Tariff Working Group (“RTWG”)² and its Billing Determinants Task Force (“BDTF”).³ On September 24, 2009 the BDTF presented its proposed deadline to the RTWG. After the BDTF’s proposal was slightly modified, the RTWG approved the modified proposal on the same day.

The RTWG forwarded the proposed revisions to SPP’s Markets and Operations Policy Committee (“MOPC”) for further review and consideration.⁴ At its October 13 – 14, 2009 meeting, the MOPC voted to recommend to the SPP Board of Directors that the revisions be approved. The recommendation was unanimously approved. Finally, on October 27, 2009, SPP’s Board of Directors granted final approval to the Tariff revisions submitted in this filing.

Thus, all of the revisions proposed in this filing have been thoroughly vetted through the SPP stakeholder process, with all entities having an interest able to

² The RTWG is responsible for the development, recommendation, overall implementation, and oversight of SPP’s regional Tariff.

³ The BDTF was formed by RTWG to review all schedules, attachments, and other relevant provisions in the SPP Tariff that use billing determinants.

⁴ The MOPC reports to the SPP Board of Directors. The representatives to the MOPC consist of an officer or employee of each SPP member. Among its responsibilities, the MOPC recommends modifications to the regional transmission service tariff.

participate in their development and approval. While SPP recognizes that such stakeholder approval by itself does not cause a filing to be just and reasonable, SPP requests that the Commission provide substantial deference to the wishes of SPP's stakeholders, consistent with its precedent.⁵

III. Description and Justification for Tariff Revisions

A. General Justification

Pursuant to Attachment J of SPP's Tariff, certain upgrades included in and constructed pursuant to the SPP Transmission Expansion Plan in order to ensure the reliability of SPP's Transmission System, as well as network upgrades identified by SPP in the Aggregate Transmission Service Study that satisfy specific criteria or are granted a waiver by SPP, are eligible for Base Plan funding.⁶ The remainder of the cost of the Base Plan Upgrade is allocated to the various SPP zones (based on each zone's incremental positive MW-mile benefits from the Base Plan Upgrade) in the form of a Base Plan Zonal ATRR in Attachment H of SPP's Tariff and a Base Plan Zonal Point-to-Point charge in Addendum 2 to Schedule 11 of SPP's Tariff.⁷

⁵ The Commission has previously recognized that provisions approved through the stakeholder processes of RTOs and ISOs are due deference. *See New Eng. Power Pool*, 105 FERC ¶ 61,300, at P 34 (2003) (Commission approving transmission cost allocation proposal based upon the extensive and thorough stakeholder process); *Policy Statement Regarding Regional Transmission Groups*, 1991-1996 FERC Stats. & Regs., Regs. Preambles ¶ 30,976, at 30,872 (1993) ("RTG Policy Statement") (the Commission will afford an appropriate degree of deference to the stakeholder approval process). The Commission's deference to RTO stakeholder processes has been upheld by the courts. *See Pub. Serv. Comm'n. of Wis. v. FERC*, 545 F.3d 1058, 1062-63 (D.C. Cir. 2008) (noting how the Commission often gives weight to a proposal that is the position of the majority of a stakeholder group of the RTO) (*quoting Am. Elec. Power Serv. Corp. v. Midwest Indep. Transmission Sys. Operator, Inc.*, 122 FERC ¶ 61,083, at P 172 (2008)).

⁶ Specifically, if the cost of a transmission upgrade that qualifies as a Base Plan Upgrade exceeds \$100,000, one third of the cost of the upgrade is allocated to the entire SPP region in the form of a Base Plan Region-Wide Annual Transmission Revenue Requirement ("ATRR") in Attachment H of SPP's Tariff. *See* SPP Tariff at Attachment J, Section III.A.2.i.

⁷ *See id.* at Attachment J, Section III.A.2.ii. If the cost of the Base Plan Upgrade is less than or equal to \$100,000, the ATRR associated with the Base Plan Upgrade is allocated to the Base Plan Zonal ATRR of the zone in which the Base Plan Upgrade is located. *See id.* at Attachment J, Section III.A.1.

Part V of SPP's Tariff provides that SPP will assess Base Plan Zonal Charges and Region-wide Charges to recover the Base Plan Zonal ATRRs and the Region-wide ATRR.⁸ These charges are determined in accordance with Schedule 11 of SPP's Tariff,⁹ and will be assessed to SPP customers taking network transmission service to serve their network load, as well as SPP Transmission Owners providing service to bundled retail and grandfathered loads for which those owners are not taking network or point-to-point transmission service.¹⁰ SPP's Tariff classifies such loads as Resident Load.¹¹

Pursuant to Schedule 11, a Network Customer's or Transmission Owner's monthly zonal Resident Load is its integrated hourly load coincident with the monthly peak of the zone where the Resident Load is physically located.¹² A Network Customer's or Transmission Owner's monthly regional Resident Load is the sum of its monthly zonal Resident Load for each zone.¹³ Therefore, in order for SPP to calculate the Base Plan Zonal Charges and Region-wide Charges, it requires Network Customers and Transmission Owners to report their integrated hourly load and monthly peaks for each SPP zone in which the Network Customer or Transmission Owner has Resident Load.

SPP's current practice is to send requests to Network Customers and Transmission Owners in early January of each year for their integrated hourly load and monthly peaks for each SPP zone in which the Network Customer or Transmission Owner has Resident Load. In order to provide Network Customers and Transmission Owners sufficient time to prepare their integrated hourly load and monthly peaks for December of the previous year, SPP requests that this information be submitted by late January of each year.¹⁴ However, there currently is no deadline by which Network Customers and Transmission Owners must supply SPP with such information. As a result, Network Customers and Transmission Owners have often taken several months to submit their information to SPP. This has caused significant delays in SPP's ability to properly calculate and bill the Base Plan Zonal Charges and Region-wide Charges, thereby hampering SPP's ability to collect the revenues necessary to pay for Base Plan

⁸ *See id.* at Section 40.

⁹ *See id.* at Schedule 11 (detailing how Base Plan Zonal Charges and Region-wide Charges are to be calculated).

¹⁰ *See id.* at Sections 41(a) and (b).

¹¹ *See id.* at Section 41(b).

¹² *See id.* at Schedule 11, Section II.A.1.

¹³ *See id.* at Schedule 11, Section II.B.1.

¹⁴ SPP calculates the Base Plan rates using 12 months worth of data.

upgrades in a timely fashion. In this filing, SPP proposes to encourage timely reporting by incorporating a deadline for Network Customers and Transmission Owners to supply SPP with the relevant information.

B. Specific Revisions to SPP Tariff

SPP proposes to revise Section 41 of its Tariff to require all entities responsible for reporting Resident Load information to SPP for the purpose of determining charges under Schedule 11 to provide such information no later than January 25 of each year for the twelve months of the prior calendar year.¹⁵ If January 25 falls on a weekend, the information must be provided no later than the immediately preceding Friday. SPP will post on its website and/or communicate to the membership of the MOPC the reporting status of the entities responsible for reporting Resident Load information.

SPP's proposed Tariff revisions are just and reasonable. SPP's establishment of a deadline for relevant entities to submit Resident Load information to SPP will provide an incentive for such entities to provide such information on a timely basis. This is necessary in order for SPP to timely fulfill its obligation under its Tariff to calculate and collect Base Plan Charges for network upgrades that qualify for such funding. Moreover, SPP's proposal to post on its website and/or communicate to the MOPC membership the reporting status of the relevant entities provides an additional incentive for timely reporting, because SPP's membership will be notified of any entities that have not timely submitted their information to SPP and are thus delaying SPP's ability to calculate and collect Base Plan Charges.¹⁶ SPP's proposed language also grants it the flexibility to publish the information to its members in a manner commensurate with the reporting response in any given year.

¹⁵ SPP is not proposing a similar deadline for transmission customers taking Point-to-Point service because, pursuant to Schedule 11 of SPP's Tariff, Base Plan Zonal Charges and Region-wide Charges for Point-to-Point service is based on Reserved Capacity. *See id.* at Schedule 11, Section I. The Reserved Capacity is the maximum amount of capacity and energy that SPP agrees to transmit for the transmission customer between the Point(s) of Receipt and Delivery. *See id.* at Section 1.39. Because SPP already has the information necessary to calculate Base Plan Zonal Charges and Region-wide Charges for Point-to-Point service, no deadline is necessary for customers to submit such information to SPP.

¹⁶ SPP's proposal to notify the membership of the MOPC is reasonable because, unlike most other SPP stakeholder committees, the MOPC's membership consists of an officer or employee of every SPP member. The MOPC thus represents the broadest point for disseminating information to SPP's membership.

The Commission has previously accepted measures that provide an incentive for entities to report necessary information in a timely manner.¹⁷ SPP's proposed Tariff revisions are thus in the public interest, and warrant Commission acceptance.¹⁸

IV. Effective Date and Request for Waiver

SPP requests that the Commission accept the Tariff revisions proposed in this filing with an effective date of January 1, 2010. Pursuant to section 35.11 of the Commission's rules and regulations, 18 C.F.R. § 35.11, SPP requests waiver of the Commission's 60-day notice requirement set forth at 18 C.F.R. § 35.3. Waiver is appropriate because the Tariff revisions submitted in this filing do not establish rates or charges for any jurisdictional services, and the Commission generally grants waiver of the notice requirement for uncontested filings that do not change rates.¹⁹ Moreover, SPP's Board of Directors did not approve the Tariff revisions submitted in this filing until Oct. 27, 2009, and SPP is submitting this filing soon thereafter.

¹⁷ See *N.Y. Indep. Sys. Operator, Inc.*, 90 FERC ¶ 61,319, at 62,064 (2000) (accepting proposed financial sanctions for installed capacity providers that do not submit required information in a timely manner, stating that “[w]ithout such penalties, installed capacity providers would have no incentive to submit the required information to the ISO, information that is necessary for the ISO to conduct operations in a safe, reliable fashion.”); see also *N.Y. Indep. Sys. Operator, Inc. Market Services Tariff* at Section 5.12.12(a) (providing for sanctions for installed capacity suppliers that fail to provide required information in a timely fashion).

¹⁸ SPP has also incorporated minor revisions into sections 40, 41, and 42 of its Tariff in order to provide consistency concerning how SPP and its Tariff are referenced, as well as to clarify that Base Plan Zonal Charges and Region-wide Charges are assessed to both network customers and grandfathered load.

¹⁹ See *Cent. Hudson Gas & Elec. Corp.*, 60 FERC ¶ 61,106, at 61,338, *reh'g denied*, 61 FERC ¶ 61,089 (1992) (“*Central Hudson*”) (stating that the Commission will generally grant waiver of the 60-day prior notice requirement for uncontested filings that do not change rates); see also *See Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, at 61,974, *order on reh'g*, 65 FERC ¶ 61,081 (1993) (interpreting *Central Hudson* to mean “waiver of notice generally will be appropriate when an uncontested filing has no rate impact”).

V. Additional Information

A. Information Required by Section 35.13 of the Commission's Regulations, 18 C.F.R. § 35.13:²⁰

(1) Documents submitted with this filing:

In addition to this transmittal letter, the following material is provided with this filing: (a) a non-redlined copy of the revised portions of SPP's Tariff, as Exhibit I; (b) a redlined copy of the revised portions of SPP's Tariff, as Exhibit II; and (c) a list of its Members and Customers served with a copy of this filing, as Exhibit III.

(2) Effective Date:

As discussed in this filing, SPP requests that the Commission accept the proposed Tariff revisions with an effective date of January 1, 2010.

(3) Service:

SPP has served a copy of this filing on all its Members and Customers. A complete copy of this filing will be posted on the SPP web site www.spp.org, and is also being served on all affected state commissions.

(4) Requisite Agreements:

SPP's Board of Directors approved this filing at its meeting on October 27, 2009.

(5) Specifically assignable facilities installed or modified:

There are none.

²⁰ Because the revisions to the SPP Tariff submitted herein do not involve any change in rates, the use of the abbreviated filing procedures as set forth in 18 C.F.R. § 35.13(a)(2)(iii) is appropriate.

B. Communications:

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

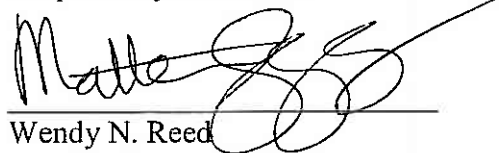
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V. Conclusion

For all of the foregoing reasons, SPP respectfully requests that the Commission accept the Tariff revisions submitted in this filing, with an effective date of January 1, 2010. SPP further requests waiver of any additional Commission regulations that the Commission may deem applicable.

Respectfully submitted,



Wendy N. Reed
Matthew K. Segers

**Attorneys for
Southwest Power Pool, Inc.**

EXHIBIT I

prior to the retail load receiving the right to choose a different supplier; and (3) its bundled load under Grandfathered Agreements. For purposes of this provision the non-rate terms and conditions are those that would apply to Network Customers. In addition, unless a Transmission Owner executes a Service Agreement under this Part III, it will not be considered as taking Network Integration Transmission Service.

V. Recovery of Costs for Base Plan Upgrades and Approved Balanced Portfolios

40. Base Plan Zonal Charge and Region-wide Charge

The Transmission Provider shall assess Base Plan Zonal Charges and Region-wide Charges specified in Schedule 11 to recover the Base Plan Zonal Annual Transmission Revenue Requirements and the Region-wide Annual Transmission Revenue Requirement.

41. Applicability to Resident Load

Base Plan Zonal Charges and Region-wide Charges shall be determined in accordance with Schedule 11 and assessed to:

- (a) Network Customers taking Network Integration Transmission Service to serve their Network Load under the Tariff; and
- (b) Transmission Owners providing transmission service to: (i) bundled retail load for which such Transmission Owners are not taking Network Integration Transmission Service or Firm Point-to-Point Transmission Service under the Tariff; and (ii) load being served under Grandfathered Agreements for which such Transmission Owners are not taking Network Integration Transmission Service or Firm Point-to-Point Transmission Service under the Tariff;

For the purposes of Schedule 11, the load defined in Sections 41(a) and (b) shall be classified as Resident Load. All entities responsible for reporting Resident Load information to the Transmission Provider, for the purpose of determining charges under Schedule 11, shall provide such information no later than January 25 of each year for the twelve months of the prior calendar year. If January 25 falls on a weekend, the information shall be provided no later than the immediately preceding Friday. The Transmission Provider shall post on its website and/or communicate to the membership of the Markets and Operations Policy Committee the reporting status of the entities responsible for reporting Resident Load information.

42. Applicability to Point-to-Point Transmission Service

Base Plan Zonal Charges and Region-wide Charges shall be determined in accordance with Schedule 11 and assessed to Transmission Customers taking Point-to-Point Transmission Service under the Tariff.

EXHIBIT II

prior to the retail load receiving the right to choose a different supplier; and (3) its bundled load under Grandfathered Agreements. For purposes of this provision the non-rate terms and conditions are those that would apply to Network Customers. In addition, unless a Transmission Owner executes a Service Agreement under this Part III, it will not be considered as taking Network Integration Transmission Service.

V. Recovery of Costs for Base Plan Upgrades and Approved Balanced Portfolios

40. Base Plan Zonal Charge and Region-wide Charge

The Transmission Provider SPP shall assess -Base Plan Zonal Charges and Region-wide Charges specified in Schedule 11 to recover the Base Plan Zonal Annual Transmission Revenue Requirements and the Region-wide Annual Transmission Revenue Requirement.

41. Applicability to Resident Load

Base Plan Zonal Charges and Region-wide Charges shall be determined in accordance with Schedule 11 and assessed to:

- (a) Network Customers taking Network Integration Transmission Service to serve their Network Load under the SPP-Tariff; and
- (b) Transmission Owners providing transmission service to: (i) bundled retail load for which such Transmission Owners are not taking Network Integration Transmission Service or Firm Point-to-Point Transmission Service under the SPP-Tariff; and (ii) load being served under Grandfathered Agreements for which such Transmission Owners are not taking Network Integration Transmission Service or Firm Point-to-Point Transmission Service under the SPP-Tariff;

For the purposes of Schedule 11, the load defined in Sections 41(a) and (b) shall be classified as Resident Load. All entities responsible for reporting Resident Load information to the Transmission Provider, for the purpose of determining charges under Schedule 11, shall provide such information no later than January 25 of each year for the twelve months of the prior calendar year. If January 25 falls on a weekend, the information shall be provided no later than the immediately preceding Friday. The Transmission Provider shall post on its website and/or communicate to the membership of the Markets and Operations Policy Committee the reporting status of the entities responsible for reporting Resident Load information.

42. Applicability to Point-to-Point Transmission Service

Base Plan Zonal Charges and Region-wide Charges shall be determined in accordance with Schedule 11 and assessed to Transmission Customers taking Point-to-Point Transmission Service under the SPP-Tariff.

EXHIBIT III

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