

Member Impacting Project Overview Integrated Marketplace Regulatory Workstream

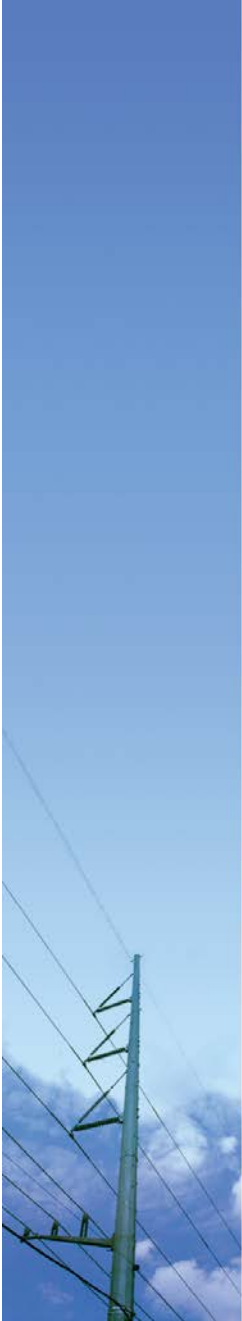


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Version Control

| Version | Date | Author | Change Description |
|---------------------|---------------------------|-----------------------------|--|
| 1.0 | 7/18/2011 | Beth Miller | Initial Version |
| 2.0 | 4/15/2013 | Beth Miller | Added definitions section explaining milestones, updated timeline with new items involving SPP Regulatory, Compliance, and CBASC. Updated timeline slide with new dates. Added additional compliance filings for 2013. |
| | | | |

Executive Summary

The Regulatory/Tariff and Compliance Workstream scope includes creating and managing all necessary NERC, FERC and state documents and filings related to the Integrated Marketplace and the Consolidated Balancing Authority ("CBA"). It is responsible for coordinating revisions to all SPP Governing documents and continually reviewing documents to ensure consistency and compliance. It also ensures all appropriate approvals from FERC, NERC, and state regulatory authorities, including CBA Registration and Certification, are secured for timely implementation and participation. Additionally, the Regulatory Staff provides communication and education outreach for market participants and regulatory authorities.

As part of planning for the Integrated Marketplace changes, an ad-hoc task force was created with senior representatives for the MWG and RTWG to help develop the initial draft language, review it, communicate it across the stakeholder groups and support it through the stakeholder process.

This MIPO will focus on the changes being made to the language in SPPs governing documents that may impact member business processes or systems. The workplan includes the process of developing, revising and approving draft language for SPPs Governing documents, which include; the SPP Tariff, Membership Agreement, and Business Practices. It encompasses overseeing the revised draft language as it moves through the stakeholder process, through MOPC and BOD approval, and through the FERC lifecycle until final approval.

[Version 2.0 of this MIPO includes updates to the timeline for SPPs approvals and associated filings, identifying filings that have been made to date, orders received from FERC and additional filings due through 2013.](#)

Business Impact

The impact is to the members that need to revise their business processes or systems based on the governing document changes of the Integrated Marketplace.

Users Impacted
TBD

Business Functions Impacted
TBD

Technical Impact

SPP Systems/Processes Impacted

This workplan does not have direct oversight of the system changes that ~~will be required~~ [are required](#) based on the Integrated Marketplace implementation; however, it provides the timeline of the Regulatory filings that need to be made in order for a member to participate in the Integrated Marketplace.

The primary change is to Attachment AE which replaces the EIS Market with the Integrated Marketplace.

For CBA related system changes, please see the CBA MIPO
http://www.spp.org/publications/MIPO_PR20070038_IM_CBA_V2_1.pdf

Anticipated Member Systems/Processes Impacted
 Not Applicable

Member Requirements

Testing

Not Applicable

Training

TBD

Implementation/Back-out Plan

Not Applicable

Summary of Timeline

| Estimated-Start Date | Estimated Complete Date | Responsible Party | Action | Description | Status |
|----------------------|-------------------------|-------------------|--|--|----------|
| 7/29/2011 | 7/29/2011 | JMTTF | JMTTF completes reviews of revised draft language, excluding CBA, Credit, and Membership Agreement | Tariff language for Marketplace filing reviewed and submitted to RTWG, MWG | Complete |
| 8/4/2011 | 8/4/2011 | SPP Regulatory | Post revised draft OATT language, excluding CBA, Credit, Reserve Sharing, and the Membership Agreement to the stakeholder groups' (MWG and RTWG) website for review | OATT Language posted for review | Complete |
| 8/23/2011 | 8/23/2011 | RTWG/MWG | JMTTF begins presenting revised draft language to the working groups. This joint meeting will walk through all of Attachment AE, and other Tariff revisions for Integrated Marketplace | Joint working group meetings to review JMTTF approved tariff language | Complete |
| 8/25/2011 | 8/25/2011 | RTWG | 1st Tariff Review Meeting - Attachment AE: Obligations, Pre-Day-Ahead, Day-Ahead, and Real Time | Review Attachment AE language | Complete |
| 9/8/2011 | 9/8/2011 | RTWG | Conference Call for Review, Clean-up and tentative approval - Attachment AE: Obligations, Pre-Day-Ahead, Day-Ahead, Real-Time | Review Attachment AE language | Complete |
| 9/15/2011 | 9/15/2011 | RTWG | Conference Call for Review, Clean-up and approval - Attachment AE: Obligations, Pre-Day-Ahead, Day-Ahead, | Review Attachment AE language | Complete |

| Estimated-Start Date | Estimated Complete Date | Responsible Party | Action | Description | Status |
|---------------------------|--|---|--|--|--|
| | | | Real-Time | | |
| 9/19/2011 | 9/19/2011 | SPP Regulatory | Release of Tariff Revisions for MOPC Review - Attachment AE: Obligations, Pre-Day-Ahead, Day-Ahead, Real-Time | Provide tariff revisions for MOPC Review | Complete |
| 9/29/2011 | 9/30/2011 | RTWG | 2nd Tariff Review Meeting - Attachment AE: ARR/TCR, Settlements, Body of Tariff & Affected Attachments | Review Attachment AE language | Complete |
| 10/5/2011 | 7/5/3125/2012 | SPP Regulatory/ Compliance/ CBA staff | Conduct Member meetings with BA's to build registration tool(s) | Joint effort to determine what type of registration tools (legal agreements, CFRs) will be utilized in the CBA and work to develop the tools | In Progress Complete |
| 10/11/2011 | 10/11/2011 | SPP Regulatory/ MOPC | MOPC Update - Regular Quarterly Meeting- Pre-MOPC workshop will review tariff modification process and roadmap | Review Attachment AE language | Complete |
| 10/14/2011 | 10/14/2011 | RTWG | Tentative follow-up Conference Call for Review, Clean-up and tentative approval - Attachment AE: ARR/TCR, Settlements, Body of Tariff & Affected Attachments | Review Attachment AE language | Complete |
| 10/20/2011 | 10/20/2011 | RTWG | Tentative follow-up Conference Call for Review, Clean-up and approval - Attachment AE: ARR/TCR, Settlements, Body of Tariff & Affected Attachments | Review Attachment AE language | Complete |
| 10/24/2011 | 10/24/2011 | SPP Regulatory | Release of Tariff Revisions for MOPC Review- Attachment AE: ARR/TCR, Settlements, Body of Tariff & Affected Attachments | Review Attachment AE language | Complete |
| 11/3/2011 | 11/4/2011 | RTWG | 3rd Tariff Review Meeting - Credit Policy, Balancing Authority Agreement, Reserve Sharing Agreement, Definitions (Att AE and Tariff) | Review Attachment AE language | Complete |
| 11/17/2011 | 11/18/2011 | RTWG | Conference Call for Review, Clean-up and approval - Credit Policy, Balancing Authority Agreement, Reserve Sharing Agreement, Definitions (Att AE and Tariff) | Review Attachment AE language | Complete |
| 11/21/2011 | 11/21/2011 | SPP Regulatory | Release of Tariff Revisions for MOPC Review - All Integrated Marketplace Tariff changes | Review Attachment AE language | Complete |
| 12/6/2011 | 12/6/2011 | SPP Regulatory/M OPC | MOPC Meeting - Special meeting for review and approval | Review Attachment AE language | Complete |
| 12/8/2011 | 12/8/2011 | RTWG | Post MOPC Review Meeting | Review Attachment AE language | Complete |
| 1/17/2012 | 1/17/2012 | SPP Regulatory | MOPC - Regular Quarterly meeting - Further review after | Review Attachment AE language | Complete |

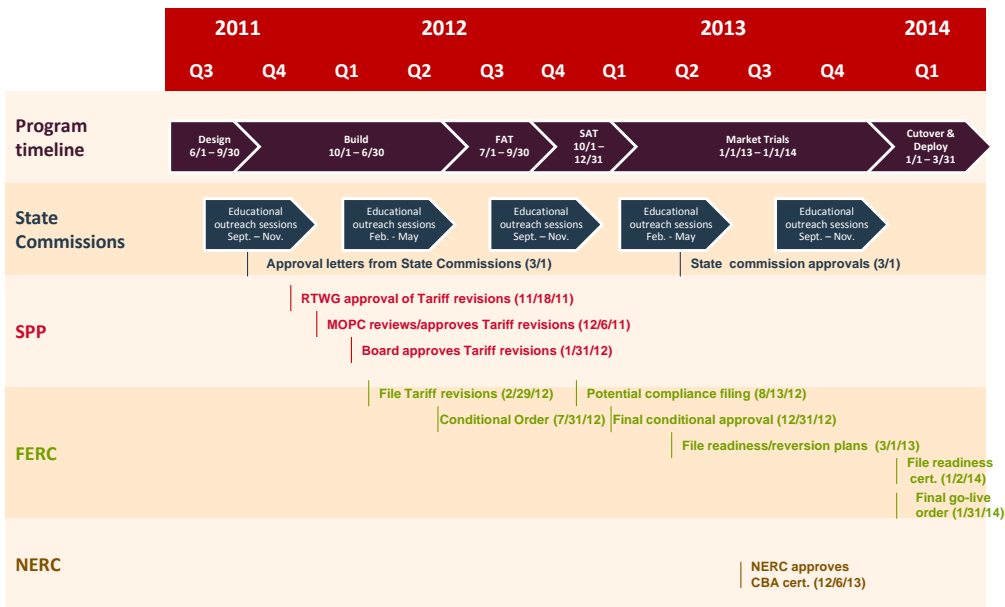
| Estimated-Start Date | Estimated Complete Date | Responsible Party | Action | Description | Status |
|---------------------------|--|--|---|--|-----------------------------------|
| | | /MOPC | 12/8 RTWG meeting if necessary | | |
| 1/31/2012 | 1/31/2012 | BOD | Regular Quarterly Meeting - Review and Approval for Tariff Filing | Review Attachment AE language | Complete |
| 2/1/2012 | 4/1/2012 2/8/2013 | SPP Regulatory/ Compliance / CBAstaff | Registration Tool recommendation by CBASC (CFR -Legal Agreement) | Rewrite of Attachment AN drafted and presented to MOPC 4/16/13 and BOD 4/30/13 for approval | In-Progress |
| 2/24/2012 | 2/24/2012 | SPP Regulatory/ Compliance / CBAstaff | Notify members of Joint meeting with Members and SPP RE/MRO | Provide information regarding Joint meeting such on 3/15/2012 | Complete |
| 2/29/2012 | 2/29/2012 | SPP Regulatory | Initial Tariff Filing submitted to FERC | Submit Integrated Marketplace Tariff filing to FERC | Complete |
| 3/15/2012 | 3/15/2012 | SPP Regulatory / Compliance / CBA staff | Joint meeting with Members and SPP RE/MRO | Meeting to define approach going forward to register SPP as BA and de-register existing 16 BA's. The timelines, duties, and how-to's will be discussed. The meeting results will determine the timeline and could affect the work-plan for the rest of 2012. | Incomplete Complete |
| 4/1/2012 | 4/30/2012 | SPP Regulatory / Compliance / CBA staff | Notify SERC of intent to request certification - 18 mos prior to intended cert start date | In order to meet requirements per SERC SPP needs to notify of intent to request certification by this date | Incomplete Complete |
| 4/10/2012 | 4/30/2012 | CBASC/ Compliance | MOPC Meeting - Status Report presented to MOPC on progress of EOP and Registration Tool | The CBASC decided at their 3/21 meeting that they were not ready to make a recommendation to MOPC they will present a status report instead | Complete |
| 4/12/2012 | 4/12/2012 | CBA staff/ SPP Regulatory / Compliance | CBASC Meeting - agenda TBD Review updated EOP with member comments | Meeting of CBASC Discuss member comments and determine schedule for approval of EOP by 4/30/12 | Incomplete Complete |
| 4/13/2012 | 4/30/2012 | CBASC/ SPP Regulatory / Compliance / CBA staff | CBASC Teleconferences /Meeting TBD | Final Approval of EOP – Draft approved 5/3/2012 | Complete |
| 5/2/2012 | 5/2/2012 | CBASC | Post consolidated list of known issues for discussion with SPP RE, MRO, SERC, and NERC | Any issues that still need to be addressed will be posted for review prior to the joint CBASC/MCG meeting | Complete |
| 5/9/2012 | 5/10/2012 | CBASC/ MCG | Joint meeting with CBASC and MCG (Market Compliance Group) | Discuss open issues and develop a list of questions to address with REs | Complete |
| 5/14/2012 | 5/14/2012 | CBASC | Post/distribute meeting material for meeting with REs | Consolidated list of questions for discussion | Complete |
| 5/21/2012 | 5/21/2012 | CBASC/RE/MRO/SERC/NE RC | Joint meeting to discuss list of questions | Determine approach on outstanding items | Complete |

| Estimated-Start Date | Estimated Complete Date | Responsible Party | Action | Description | Status |
|--------------------------|--------------------------|---------------------------------------|---|---|------------------------|
| 5/15/2012 | 5/15/2012 | SPP Regulatory | Supplemental Filing | Supplemental filing submitted | Complete |
| June 2012 | June 2012 | CBASC/ MOPC | Special MOPC meeting to present status of CBA issues | Update MOPC on status of issues for CBA | Incomplete Complete |
| 7/15/2012 | 7/15/2012 | CBASC/ SPP Regulatory /Compliance | MOPC Meeting - | Present recommendation on Registration Tools(s) | Incomplete Complete |
| 7/31/2012 | 10/18/2012 | SPP Regulatory | Conditional FERC Order Received for Initial Tariff Filing (likely subject to compliance filings) | Order received will determine dates, workflow, timeline going forward | Complete |
| 8/1/2012 | 8/1/2012 | SPP Regulatory /Compliance/ CBA staff | Incorporate Final Design Details | Tariff, CFR/Legal Agreements design details included per FERC order timeline- subject to change | Incomplete |
| 9/3/2012 | 9/3/2012 | SPP Regulatory /Compliance/ CBA staff | SPP Staff - Finalize, Present Completed Registration Tool | Tariff, CFR/Legal Agreements design details included per FERC order timeline- subject to change | Incomplete Complete |
| 10/3/2012 | 10/3/2012 | SPP Regulatory /Compliance/ CBA staff | Completed Registration Tool Approvals (CBASC, SPP Executive, MOPC) | Tariff, CFR/Legal Agreements design details included per FERC order timeline- subject to change. The issue of indemnification was passed to the Corporate Governance Committee for decision. | Incomplete Complete |
| 10/8/2012 | 10/8/2012 | SPP Regulatory /Compliance/ CBA staff | Submit Formal NERC Registration Change/Tool to SPP RE, SERC, and MRO. Hold discussions with the SPP RE's on the process | Tariff, CFR/Legal Agreements design details included per FERC order timeline- subject to change; define exit criteria to trigger members to engage SERC | Incomplete Complete |
| 10/15/2012 | 10/15/2012 | SPP Regulatory /Compliance/ CBA staff | MOPC Meeting --Placeholder | MOPC Meeting | Incomplete Complete |
| 10/16/2012 | 10/16/2012 | CBA staff/ SPP Regulatory/ Compliance | CBASC Meeting - agenda TBD | CBASC Meeting | Incomplete Complete |
| 12/31/2012 February 2014 | 12/31/2012 February 2014 | SPP Regulatory | Final FERC Approval Order Received for Tariff Filing (subject to future conditions, filings, etc. up to implementation) | Tariff, CFR/Legal Agreements design details included per FERC order timeline- subject to change. Based on the status and timing of the 2013 filings, we are not expecting to receive a final order until the expected effective date. | Incomplete |
| 10/18/2012 | 2/15/2013 | SPP Regulatory | Compliance order submitted in response to FERC conditional approval 10/18/2013 | Submitted in ER12-1179 | complete |

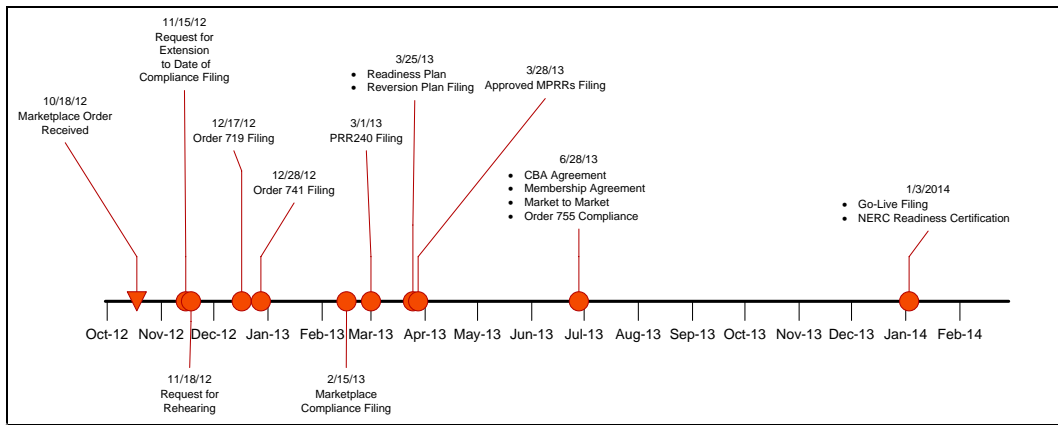
| Estimated-Start Date | Estimated Complete Date | Responsible Party | Action | Description | Status |
|--|--|---------------------------------------|--|---|---------------------------------------|
| 2/5/2013 | 2/5/2013 | SPP Regulatory /Compliance/ CBA staff | Schedule SERC Certification Visit | SERC visits scheduled Compliance has made a request to SERC to start the review/approval process in September 2013 | Incomplete Complete |
| 5/1/2013 | 9/28/2013 | SPP Regulatory /Compliance/ CBA staff | SPP-RE Member Validation Visits | Separate Readiness metrics need two dates 5/1/2013 & finalized 9/28/2013 | Incomplete |
| 9/13/2013 November 2013 | 9/13/2013 November 2013 | SPP Regulatory /Compliance/ CBA staff | SERC at SPP for Certification/ possible tool edits as-needed | Discuss certification and determine if changes will be necessary per SERC | Incomplete |
| 9/27/2 December 2013 | 9/27/2013 December 2013 | SPP Regulatory /Compliance/ CBA staff | Anticipated SERC Approval | Receive SERC approval and certification for SPP to fulfill CBA role | Incomplete |
| 10/11/2013 December 2013 | 10/11/2013 December 2013 | SPP Regulatory /Compliance/ CBA staff | SERC Submits Letter and Files Registration Changes with NERC | Tariff, CFR/Legal Agreements, design details included per FERC order timeline: subject to change | Incomplete |
| 10/25/2013 | 10/25/2013 | SPP Regulatory /Compliance/ CBA staff | SERC Approval | SERC Approval | Incomplete |
| 1/3/2014 January 2014 | 1/3/2014 January 2014 | SPP Regulatory /Compliance/ CBA staff | NERC Certification Approved | NERC Certification Approved | Incomplete |
| 1/4/2014 | 1/4/2014 | SPP Regulatory /Compliance/ CBA staff | Go-Live & Readiness Filing - includes NERC certification submitted to FERC | Tariff, CFR/Legal Agreements, design details included per FERC order timeline: subject to change | Incomplete |
| FBD 3/25/2013 | FBD 3/25/2013 | SPP Regulatory /Legal/CBA staff | Development of Reversion Plan | Tariff, CFR/Legal Agreements, design details included per FERC order timeline: subject to change | Complete In Progress |
| FBD 10/18/2012 | FBD 4/25/2013 | SPP Regulatory /Legal/CBA staff | CBA Legal Agreement review by RTWG complete | Tariff, CFR/Legal Agreements, design details included per FERC order timeline: subject to change CBA Agreement will replace Attachment AN – approved by MOPC 4/17/2013 pending approval by the RTEG on 4/25/2013 and BOD approval on 4/30/2013 | In Progress Complete Incomplete |
| FBD 4/30/2013 | FBD 4/30/2013 | SPP Regulatory /Legal/CBA staff | Legal Agreement complete BOD Approval | Tariff, CFR/Legal Agreements, design details included per FERC order timeline: subject to change BOD approval of CBA Agreement as replacement to Attachment AN. | Incomplete Complete |

Comment [BJM1]: SERC determined it did not need to visit each BA. Research and evaluations will be done as part of the CIP Audit in September 2013 and continue with visits in October and November for Parallel Operations and Deployment Testing

Integrated Marketplace: Regulatory Timeline



2012 - 2014 Timeline



Field Code Changed

Filings/Orders

| Filing/Order | Title | Date |
|-------------------------------|--|------------|
| ER12-1179 | SPP Integrated Marketplace Filing | 2/25/2012 |
| | Conditional FERC Approval Order Received | 10/18/2012 |
| | SPP Integrated Marketplace Compliance Filing | 2/15/2013 |
| | Supplemental Compliance Filing | 3/1/2013 |
| | Readiness and Reversion Plan | 3/25/2013 |
| ER12-1179-001 | Supplemental Filing | 5/15/2012 |
| ER12-1179-002 | FERC Order on Rehearing and Clarification | 3/21/2013 |
| ER12-1179-000 & ER12-1179-001 | Motion for Extension of Time Filing | 11/16/2012 |
| | Request for Rehearing or Clarification Filing | 11/19/2012 |
| | Status Report for Grandfathered Agreements submitted | 1/16/2013 |
| ER13-834 | SPP Filing to Implement Temporary Registration Freeze in SPP Marketplace | 1/30/2013 |
| | FERC Order Conditionally Accepting Registration Filing | 3/29/2013 |
| ER13-1173 | SPP Integrated Marketplace Filing | 3/28/2013 |

Assumptions

TBD

Risks

TBD

Additional Documentation

TBD

Communication Plan

All project communication and information will be posted to the SPP Change Working Group Project Documentation folder. This MIPO will be updated upon change or with any new information, a redline version posted to the project documentation folder, and the CWG notified.

Next Steps

| Action | Assignee | Status & Due Date |
|--|----------------------|-------------------|
| Send project communication and identify liaison at member/participant companies as necessary | CWG Staff Secretary | |
| Response due? | CWG Representative | |
| MIPO Review Meeting? | Project Team/Liaison | |

FAQs

Frequently asked questions will be added to the document as identified or necessary.