



Control Number: 49737



Item Number: 267

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SOAH DOCKET NO. 473-19-6862  
PUC DOCKET NO. 49737

2020 FEB 18 PM 2:35

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR §  
CERTIFICATE OF CONVENIENCE § OF  
AND NECESSITY AUTHORIZATION §  
AND RELATED RELIEF FOR THE §  
ACQUISITION OF WIND § ADMINISTRATIVE HEARINGS  
GENERATION FACILITIES §

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO  
GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S  
THIRD REQUEST FOR INFORMATION**

**FEBRUARY 18, 2020**

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO  
GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S  
THIRD REQUEST FOR INFORMATION**

**Question No. GSEC 3-1:**

Related to SWEPCO's response to GSEC 2-8, given that Attachment J Section III(B) of the SPP Open Access Transmission Tariff ("OATT") describing Conditions for Classifying Service Upgrade Costs Associated with Designated Resources As Base Plan Upgrade Costs Eligible for Cost Allocation, provides, "If the Designated Resource is a wind generation plant, then the sum of: (1) the requested capacity and (2) the transmission capacity reserved for the Transmission Customer's existing Designated Resources that are wind generation plants shall not exceed 20% of the Transmission Customer's projected system peak responsibility as determined pursuant to SPP Criteria in the first year the Designated Resource is planned to be used by the Transmission Customer" (the "20% Wind Rule"):

- a. What amount of transmission capacity currently is reserved for AEP's existing Designated Resources that are wind generation plants? Please provide all documentation supporting the response.
- b. After accounting for the transmission capacity reserved for AEP's existing Designated Resources that are wind generation plants (see amount in response to (a) above), how much transmission capacity remains available for the Selected Wind Facilities under the 20% Wind Rule? Please provide all documentation supporting the response.
- c. To the extent that the transmission capacity required for the Selected Wind Facilities exceeds the 20% threshold established by the 20% Wind Rule, please describe and quantify the costs that will be borne by the Selected Wind Facilities and AEP?

**Response No. GSEC 3-1:**

- a. & b. These questions appear to focus on the issue of what funding will be available under the tariff in the event the Company requests firm transmission service. After filing this docket, SWEPCO submitted a transmission service request from the Selected Wind Facilities for delivery to the Company load area. These requests were submitted on the SPP OASIS and assigned Transmission Service Requests 90334931, 90334947 and 90335029. The requests are now part of SPP's 2019 AG2. Although SWEPCO has requested this service, it will evaluate the results of the study and determine if the cost of acquiring Firm Transmission Service provides benefits in excess of the cost of procuring that service. During the initial discussions with SPP concerning the Transmission Service Requests submitted in SPP Aggregate Study 2019 AG2, SPP indicated only the 199 MW request from Sundance would qualify for Regional Funding due to application of the 20% wind rule.

- c. Although not relevant to this docket, the costs associated with SWEPCO's share of any transmission service request that are directly assigned to the customer would be the responsibility of SWEPCO.

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