



Craig W. Silverstein
202.969.4212 DIRECT
202.785.9163 DIRECT FAX
craig.silverstein@stinsonleonard.com

December 1, 2014

Via eTariff

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

Re: **Golden Spread Electric Cooperative, Inc.**
Docket No. ER15-____-000
Order No. 676-H Request for Waiver

Dear Secretary Bose:

Pursuant to Order No. 676-H¹ and the Errata Notice issued October 3, 2014, Golden Spread Electric Cooperative, Inc. (“Golden Spread”) hereby respectfully requests waiver of the latest version (Version 003) of certain business practice standards adopted by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”). In Order No. 676-H, the Federal Energy Regulatory Commission (“FERC” or “Commission”) amended its regulations to (1) incorporate by reference the latest version of the NAESB WEQ Standards, and (2) list informationally, as guidance, NAESB’s Smart Grid Standards. The new and revised standards, in part, enable public utilities to implement the requirements of Order Nos. 890, 890-A, 890-B and 890-C.² As explained more fully below, Golden Spread requests waiver of these standards. Golden Spread hereby amends its open access transmission tariff (“OATT”) to add Attachment S, NAESB WEQ Standards, which reflects this waiver request.

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 148 FERC ¶ 61,205 (2014).

² *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241 (2007), *order on reh’g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh’g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh’g and clarification*, Order No. 890-C, 126 FERC ¶ 61,228 (2009) (Order No. 890-C). The Version 002 standards also included revisions made in response to Order No. 890.

The Honorable Kimberly D. Bose
December 1, 2014
Page 2

In support of its filing, Golden Spread states the following:

A. Notices and Communications

All notices, communications or correspondences regarding this matter should be directed to the following:

Lloyd Kolb
Transmission Administrator
William C. Harrelson
Associate General Counsel
Golden Spread Electric
Cooperative, Inc.
Post Office Box 9898
Amarillo, TX 79105-5898
(806) 379-7766 (telephone)
(806) 374-2922 (facsimile)
lkolb@gsec.coop
bharrelson@gsec.coop

Craig W. Silverstein
Marcia A. Stanford
Stinson Leonard Street LLP
1775 Pennsylvania Ave., NW
Suite 800
Washington, DC 20006
(202) 969-4212 (phone)
(202) 785-9163 (fax)
e-mail: craig.silverstein@stinsonleonard.com
marcia.stanford@stinsonleonard.com

B. Description of Golden Spread

Golden Spread is a non-profit electric generation and transmission cooperative organized under the Texas Electric Cooperative Corporation Act. Golden Spread's corporate purpose is to supply wholesale electric power and energy at the lowest feasible cost to its 16 member non-profit distribution cooperatives.³ Golden Spread's member systems serve over 270,000 retail consumers located in the Panhandle, South Plains and Edwards Plateau regions of Texas, an area covering twenty-four percent of the state, and in the Panhandle of Oklahoma and in portions of Southwestern Kansas and Southeastern Colorado. Golden Spread operated under a waiver of Order Nos. 888 and 889 since 1996 because it owned limited and discrete facilities that do not form an integrated transmission grid.

³ Golden Spread's 16 distribution cooperative members are: Bailey County Electric Cooperative Association (Muleshoe, Texas); Concho Valley Electric Cooperative, Inc. (San Angelo, Texas); Coleman County Electric Cooperative, Inc. (Coleman, Texas); Deaf Smith Electric Cooperative, Inc. (Hereford, Texas); Greenbelt Electric Cooperative, Inc. (Wellington, Texas); Lamb County Electric Cooperative, Inc. (Littlefield, Texas); Lighthouse Electric Cooperative, Inc. (Floydada, Texas); Lyntegar Electric Cooperative, Inc. (Tahoka, Texas); Big Country Electric Cooperative, Inc. (Roby, Texas); North Plains Electric Cooperative, Inc. (Perryton, Texas); Rita Blanca Electric Cooperative, Inc. (Dalhart, Texas); South Plains Electric Cooperative, Inc. (Lubbock, Texas); Southwest Texas Electric Cooperative, Inc. (El Dorado, Texas); Swisher Electric Cooperative, Inc. (Tulia, Texas); Taylor Electric Cooperative, Inc. (Merkel, Texas); and Tri-County Electric Cooperative, Inc. (Hooker, Oklahoma).

The Honorable Kimberly D. Bose
December 1, 2014
Page 3

Golden Spread does not own all the facilities required to serve its members. Golden Spread takes Network Integration Transmission Service under the Southwest Power Pool (“SPP”) Regional OATT to serve its distribution cooperative member load located within the SPP footprint. Golden Spread also owns discrete radial transmission facilities (“Special Facilities”) that are used to supply loads of three of its members in the SPP. The three members are Big Country Electric Cooperative, Inc., Greenbelt Electric Cooperative, Inc. and South Plains Electric Cooperative, Inc. The Special Facilities program is a voluntary program offered by Golden Spread for the benefit of its members. Program participants can both transfer ownership of existing radial transmission facilities to Golden Spread and arrange for Golden Spread to construct new facilities. All transfers are based on original cost and are made pursuant to a Special Facilities Agreement that allows the member to reacquire the facilities subject to required regulatory approvals. Although Golden Spread holds title to Special Facilities, they are operated and maintained by the associated member.

On May 17, 2011, Golden Spread received a good faith request for generator interconnection service for an entity proposing to connect to one of the Special Facilities. This request triggered an obligation under its Order No. 888 waiver to file a tariff, and accordingly, Golden Spread subsequently submitted its initial OATT, which was accepted by the Commission on April 24, 2012.⁴ The Commission expressly permitted Golden Spread to retain its waiver of Order No. 889, including all obligations to operate an OASIS, and granted Golden Spread a waiver of the Transmission Loading Relief (“TLR”) procedures.

There is only one active customer that purchases a nominal amount (20 MW) of OATT service from Golden Spread, and currently there are no generation interconnection or transmission service requests in the queue. The single transmission customer on the Golden Spread’s transmission “system” under its OATT takes long-term firm point-to-point service; there are no network integration transmission service customers. Moreover, Golden Spread’s transmission function has only one dedicated, full-time employee. Golden Spread’s transmission system is fully embedded in other control areas and on the periphery of the footprint of the SPP; Golden Spread does not provide any control area services and it does not operate as a balancing authority area (“BAA”).

C. Requests for Waiver

Pursuant to Paragraphs 72 and 86 of Order No. 676-H, Golden Spread respectfully requests continued waiver of the following Version 003 NAESB standards:

- WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5;
- WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version

⁴ *Golden Spread Electric Cooperative, Inc.*, 139 FERC ¶ 61,067 (2012)(“*Golden Spread OATT Order*”).

The Honorable Kimberly D. Bose
 December 1, 2014
 Page 4

003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);

- WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012); and
- WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013).

As noted above, the Commission has consistently granted Golden Spread waiver of the requirement to establish and maintain an OASIS.⁵ The Commission also granted Golden Spread waiver of the TLR Procedures.⁶ Good cause exists to continue waiver of Version 003 of these NAESB standards because the circumstances under which the Commission originally granted the waiver have not changed. Golden Spread's transmission facilities remain limited and discrete and still do not constitute an integrated transmission system, and Golden Spread still does not operate a balancing authority. Accordingly, continued waiver of these NAESB standards is appropriate.

Golden Spread also requests waiver of the following standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (as modified by NAESB final actions ratified on December 28, 2012);
- WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012);
- WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;
- WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
- WEQ-011, Gas / Electric Coordination, WEQ Version 003, July 31, 2012;
- WEQ-012, Public Key Infrastructure (PKI) WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on October 4, 2012);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and

⁵ See e.g., *Black Hills Power, Inc., et al.*, 135 FERC ¶ 61,058, P 48 (2011).

⁶ *Golden Spread OATT Order* at P 15.

The Honorable Kimberly D. Bose
December 1, 2014
Page 5

- WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

Standard WEQ-004 sets forth procedures for implementing transactions crossing one or more BAAs. Because Golden Spread's limited and discrete transmission facilities are subsumed within another transmission provider's BAA, Golden Spread has no authority over matters affecting the identification, quantification or approval of net interchange transactions as contemplated by WEQ-004. Golden Spread also does not qualify to be an Approval Entity for purposes of WEQ-004. SPP is the net interchange authority and the Approval Entity. Accordingly, waiver is appropriate.

Standards WEQ-005, WEQ-006, and WEQ-007 involve obligations specific to BAAs. The Commission has made clear that transmission providers that do not serve as BAAs may obtain a waiver of the WEQ requirements specifically applicable only to that function.⁷ As noted above, Golden Spread is not a BAA. Accordingly, waiver of standards WEQ-005, WEQ-006, and WEQ-007 is appropriate.

Waiver of Standard WEQ-011, which deals with improving coordination and daily operational communications between transportation providers and gas-fired power plants, is appropriate because Golden Spread does not have any gas-fired generation interconnected to its transmission system. The sole generator connected to its transmission facilities is a 20 MW wind farm.

Standard WEQ-012 provides uniform standards to enhance security for business transactions taking place over the Internet. Based on the waivers granted to Golden Spread as part of the acceptance of its OATT and the limited nature of those Special Facilities, potential customers that want to request transmission service over Golden Spread's "system" must do so by submitting a paper copy of the request rather than using an OASIS or other Internet means, WEQ-012 is not applicable to Golden Spread, so waiver of standard WEQ-012 is appropriate.

Golden Spread also requests waiver of standards WEQ-015 and WEQ-021. These standards apply to measurement and verification of products and services specific to demand response and energy efficiency in organized independent system operator ("ISO") / regional transmission organization ("RTO") wholesale markets. Because Golden Spread is not a transmission-owning member of an ISO or RTO, these NAESB WEQ standards are inapplicable to Golden Spread's transmission system. Accordingly, waiver is appropriate.

Standard WEQ-000 contains the abbreviations, acronyms, and definitions of terms that are referenced in the NAESB WEQ Standards. Because Golden Spread is requesting waiver of all of the other NAESB Standards, Golden Spread will not need to have these abbreviations, acronyms and definitions in its OATT. Therefore, Golden Spread respectfully requests waiver of Standard WEQ-000.

⁷ *Participating Transmission Owners Administrative Committee*, 133 FERC ¶ 61,197 at P 13 (2010).

The Honorable Kimberly D. Bose
December 1, 2014
Page 6

For these reasons, Golden Spread respectfully requests continued waiver of the obligation to incorporate NAESB standards WEQ-001 through WEQ-003 and WEQ-013, and a new waiver of the obligation to incorporate NAESB standards WEQ-000. WEQ-004 through WEQ-008, WEQ-011, WEQ-012, WEQ-015 and WEQ-021, into its OATT. Golden Spread commits to make a filing with the Commission should any of the circumstances described above change.

D. Contents of Filing

Golden Spread's compliance filing consists of:

- This transmittal letter;
- A clean copy of new Attachment S for publishing in eLibrary; and
- All XML format schema and metadata required under Order No. 714.

Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,

STINSON LEONARD STREET LLP

/s/ Craig W. Silverstein

Craig W. Silverstein

Counsel for Golden Spread Electric Cooperative, Inc.

ATTACHMENT S

NAESB WEQ STANDARDS

Pursuant to the Commission's April 25, 2006 Final Rule, Order 676 (115 FERC ¶ 61,102), April 19, 2007 Final Rule, Order 676-B (119 FERC ¶ 61,049), its July 21, 2008 Final Rule, Order 676-C (124 FERC ¶ 61,070), its November 20, 2009 Final Rule, Order 676-E (129 FERC ¶ 61,162), and its September 18, 2014 Final Rule Order 676-H (148 FERC ¶ 61,205) amending its regulations under the Federal Power Act, Transmission Provider has determined that certain standards should not be incorporated by reference in its OATT and has requested waiver of the following NAESB WEQ standards:

1. WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
2. WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5;
3. WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
4. WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
5. WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (as modified by NAESB final actions ratified on December 28, 2012);
6. WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012);
7. WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;
8. WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
9. WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);
10. WEQ-011, Gas / Electric Coordination, WEQ Version 003, July 31, 2012;
11. WEQ-012, Public Key Infrastructure (PKI) WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on October 4, 2012);

12. WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
13. WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
14. WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

FERC rendition of the electronically filed tariff records in Docket No. ER15-00528-000

Filing Data:

CID: C001298

Filing Title: OATT Order No. 676-H Compliance Filing

Company Filing Identifier: 20141201

Type of Filing Code: 80

Associated Filing Identifier:

Tariff Title: Open Access Transmission Tariff

Tariff ID: 4

Payment Confirmation:

Suspension Motion:

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

OATT Attachment S, ATTACHMENT S NAESB WEQ Standards, 0.0.0, A

Record Narrative Name:

Tariff Record ID: 67

Tariff Record Collation Value: 67100 Tariff Record Parent Identifier: 0

Proposed Date: 2015-02-02

Priority Order: 501

Record Change Type: NEW

Record Content Type: 1

Associated Filing Identifier:

ATTACHMENT S

NAESB WEQ STANDARDS

Pursuant to the Commission's April 25, 2006 Final Rule, Order 676 (115 FERC ¶ 61,102), April 19, 2007 Final Rule, Order 676-B (119 FERC ¶ 61,049), its July 21, 2008 Final Rule, Order 676-C (124 FERC ¶ 61,070), its November 20, 2009 Final Rule, Order 676-E (129 FERC ¶ 61,162), and its September 18, 2014 Final Rule Order 676-H (148 FERC ¶ 61,205) amending its regulations under the Federal Power Act, Transmission Provider has determined that certain standards should not be incorporated by reference in its OATT and has requested waiver of the following NAESB WEQ standards:

1. WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
2. WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5;
3. WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
4. WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012

(with minor corrections applied Nov. 26, 2013);

5. WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (as modified by NAESB final actions ratified on December 28, 2012);
6. WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012);
7. WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;
8. WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
9. WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);
10. WEQ-011, Gas / Electric Coordination, WEQ Version 003, July 31, 2012;
11. WEQ-012, Public Key Infrastructure (PKI) WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on October 4, 2012);
12. WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
13. WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
14. WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

Document Content(s)

Transmittal Letter.PDF.....1-7

Clean Tariff.PDF.....8-9

FERC GENERATED TARIFF FILING.RTF.....10-11