New Service Request Cost Allocation

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• Types of applications:
  – Attachment N – new generation and uprates to existing generation
  – Attachment S – merchant transmission requests
  – Attachment Y – new generation, less than 2 MW synchronous, 5 MW inverter and not seeking Capacity Interconnection Rights (CIRs)
  – Attachment BB – inverter based generation no larger than 10kW
  – Attachment EE – Upgrade Request (IARR request)
  – Attachment FF – Long term firm request
• Studies intended to be evaluated in coordinated queue
  – Customers are evaluated together and in sequential order for each queue

• Cost Allocation rules cause divergence in process for some studies
  – Transmission Service customers are not allowed to share costs with other customers in the queue
Queue Study Process

• Applicability
  – Generation or Merchant Transmission
  – Transmission Service
  – Upgrade Requests (IARRs, upgrades)

• Upgrades
  – Determined based on coordinated single queue
• Upgrade costs - Cost allocation not allowed for all projects included in study under Tariff §217.3a
  – Causes the need to study projects and determine individual incremental upgrades on the system as opposed to allowing multiple projects to share costs
  – Causes potential for system overbuild
  – Reduces efficiency in study processes
  – Causes customers to fund multiple projects, reducing the sharing of costs
New Service Request:
An Interconnection Request, a Completed Application, or an Upgrade Request.

Interconnection Request:
A Generation Interconnection Request, a Transmission Interconnection Request and/or an IDR Transfer Agreement

Completed Application:
An Application that satisfies all of the information and other requirements of the Tariff, including any required deposit.

[Transmission Service Customers]

Upgrade Request:
A request submitted in the form prescribed in Attachment EE of the Tariff, …

[IARR or Merchant Network Upgrade customer]
Solution

• Ensure Tariff language allows cost allocation to occur for all projects

• Ensure Manual language allows cost allocation to occur for all projects

• Continue to require that all projects pay for costs associated with the upgrades needed to support the level of service they are requesting (no change required for this)