

168 FERC ¶ 61,076
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

August 2, 2019

In Reply Refer To:
GridLiance High Plains LLC
Docket Nos. ER18-1267-004
ER18-1267-005
ER18-1267-006

Husch Blackwell LLP
750 17th Street NW
Suite 800
Washington, DC 20006

Attention: Linda Walsh
Attorney for GridLiance High Plains LLC

Reference: Compliance Filing

Dear Ms. Walsh:

1. On October 16, 2018, in Docket No. ER18-1267-004 (October Filing), GridLiance High Plains LLC (GridLiance High Plains) submitted revisions to its Open Access Transmission Tariff (Tariff) in compliance with directives in a Commission order issued on August 17, 2018.¹ On February 26, 2019, in Docket No. ER18-1267-005 (February Filing), and on April 18, 2019, in Docket No. ER18-1267-006 (April Filing), GridLiance High Plains submitted additional revisions to its Tariff.

2. On March 30, 2018, in Docket No. ER18-1267-000 (Initial Filing), South Central MCN LLC² had filed a proposed Tariff to govern the terms of transmission service over its facilities that are not under the functional control of Southwest Power Pool, Inc. (SPP) (radial facilities). South Central explained that its proposed Tariff was based on the

¹ *S. Cent. MCN LLC*, 164 FERC ¶ 61,114 (2018) (August Order).

² South Central MCN LLC changed its name to GridLiance High Plains LLC subsequent to the Initial Filing. See *GridLiance High Plains LLC*, Docket No. ER18-1961-000, at 1 (Sept. 21, 2018) (delegated letter order).

Commission's *pro forma* Open Access Transmission Tariff and, as such, it included a Local Planning Process as Attachment K of the Tariff. In the August Order, the Commission conditionally accepted the Initial Filing, effective March 31, 2018, granted and revoked certain waivers, and directed a compliance filing.³

3. In the October Filing, GridLiance High Plains submitted Tariff revisions addressing the four compliance directives in the August Order. Specifically, GridLiance High Plains proposes: (1) ministerial revisions to the table of contents to reflect the approved deletion of Schedules 1 through 6 and Schedule 9; (2) revisions to the Tariff's definition of Open Access Same-Time Information System (OASIS) and standards of conduct; (3) revisions to Attachment Q of its Tariff to include its unpopulated formula rate template; and (4) revisions to Attachment K of the Tariff to specify how its Local Planning Process complies with the Commission's requirements in Order No. 1000⁴ regarding the consideration of transmission needs driven by public policy requirements for GridLiance High Plains facilities that are under SPP's functional control. Additionally, GridLiance High Plains proposed changes to reflect its changed name.⁵ GridLiance High Plains requests that the Commission accept these Tariff revisions effective on March 31, 2018.

4. In the February Filing, GridLiance High Plains filed a number of clean-up edits to Attachment K and Attachment Q including, among other revisions, to revise and include its formula rate protocols as an Attachment A to Attachment Q. However, GridLiance High Plains did not remove the version of its formula rate protocols previously included in Attachment Q itself. In the April Filing, GridLiance High Plains filed a further revision to Attachment K and also filed revisions to Attachment Q to remove the formula rate protocols from the formula rate template in Attachment Q to reflect that the formula rate protocols had been moved from Attachment A to Attachment Q.⁶

³ GridLiance High Plains amended the Initial Filing on April 2, 2018 and June 18, 2018. The August Order addressed Docket Nos. ER18-1267-000, ER18-1267-001, ER18-1267-002, and ER18-1267-003.

⁴ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 61,051, at P 205 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014)

⁵ October Filing at 2-4.

⁶ April Filing at 2.

5. Notice of GridLiance High Plains' October Filing was published in the *Federal Register*, 83 Fed. Reg. 53,470 (2018), with interventions and protests due on or before October 16, 2018. None was filed. Notice of GridLiance High Plains' February Filing was published in the *Federal Register*, 84 Fed. Reg. 7359 (2019), with interventions and protests due on or before March 19, 2019. None was filed. Notice of GridLiance High Plains' April Filing was published in the *Federal Register*, 84 Fed. Reg. 17,153 (2019), with interventions and protests due on or before May 9, 2019. None was filed.

6. We accept the proposed Tariff revisions in part, effective March 31, 2018, because they comply with the directives in the August Order. However, we note a discrepancy within the proposed revisions to Attachment Q of the Tariff. Specifically, in the April Filing, GridLiance High Plains proposed revisions to Attachment Q in the Commission's eTariff system using a lower priority code than the revisions submitted in the October Filing. Given GridLiance High Plains' stated intent that the Commission accept the revisions proposed in the later, April Filing, we reject the revisions to Attachment Q submitted in the October Filing as moot, and accept the revisions to Attachment Q submitted in the April Filing.

By direction of the Commission.

Kimberly D. Bose,
Secretary.