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October 27, 2022

VIA ETARIFF/ELECTRONIC FILING

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

Re: *Golden Spread Electric Cooperative, Inc.*
Docket No. ER23-____-000
Proposed Open Access Transmission Tariff Revisions
Order No. 676-J Second Compliance Filing and Request for Continued Waivers
Filing Type Code: 80

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission’s (“Commission”) directive in Order No. 676-J,¹ Golden Spread Electric Cooperative, Inc. (“Golden Spread”) hereby submits its second compliance filing to amend Attachment S to Golden Spread’s Open Access Transmission Tariff (“OATT or Tariff”) to incorporate by reference certain Standards for Business Practices and Communication Protocols for Public Utilities adopted by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”). Golden Spread submitted its first compliance filing in accordance with Order No. 676-J on May 10, 2022, and as of the date of this filing, that matter is still pending before the Commission.

As part of this filing Golden Spread is also concurrently requesting continued waivers of incorporation by reference of certain WEQ standards consistent with the recent determination in Golden Spread’s Order No. 676-I² compliance that such waivers remain appropriate.³

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-J, 175 FERC ¶ 61,139 (2021) (“Order No. 676-J”).

² *Standards for Business Practices and Communication Protocols for Public Utilities*, 170 FERC ¶ 61,062 (2020) (“Order No. 676-I”), *order on clarification*, 173 FERC ¶ 61,173 (2020).

³ *Golden Spread Electric Cooperative, Inc.*, 178 FERC ¶ 61,160 (2022).

In support of its compliance filing, Golden Spread states as follows:

I. COMMUNICATIONS

Please send all correspondence regarding this matter to the following individuals:

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II. BACKGROUND

A. DESCRIPTION OF GOLDEN SPREAD AND ITS TARIFF

Golden Spread is a non-profit electric generation and transmission cooperative organized under the Texas Electric Cooperative Corporation Act. Golden Spread's main corporate purpose is to supply cost effective and reliable wholesale electric power and energy to its sixteen Member cooperatives. Golden Spread supplies wholesale power to its sixteen Member cooperatives in the Southwest Power Pool ("SPP") and the Electric Reliability Council of Texas. Golden Spread's members provide electric service to about 310,000 retail electric meters serving member consumers located in the Panhandle, South Plains, and Edward Plateau regions of Texas, an area covering 24 percent of the state, and in the Panhandle of Oklahoma and in small portions of Southwestern Kansas and Southeastern Colorado.

On June 18, 1987, the Commission determined that Golden Spread was a public utility subject to the Commission's jurisdiction and accepted Golden Spread's initial rates to provide wholesale full requirements service to its member systems pursuant to Section 205 of the FPA. On April 24, 2012, the Commission accepted Golden Spread's OATT for filing.⁴ Concurrent with that acceptance and in subsequent orders, Golden Spread was granted a waiver of standards of conduct

⁴ *Golden Spread Electric Cooperative, Inc.*, 139 FERC ¶ 61,067 (2012). Golden Spread's limited owned facilities within the SPP region are comprised of facilities that Golden Spread has financed and/or constructed (as needed) on behalf of its requesting members ("Special Facilities") that are used to supply the loads of the specific member participating in what is referred to as "Rider A" of Golden Spread's requirements wholesale power contract with its member. Golden Spread has one third party generator that takes service pursuant to its OATT.

and the obligation to operate an open-access same-time information system (“OASIS”).⁵ Due to the discrete nature of its facilities, all transmission service purchased or requested on the Golden Spread system under its OATT has been point-to-point service; there are no network integration transmission service customers and Part III of the Tariff has been eliminated. Golden Spread’s transmission system is fully embedded in other control areas; Golden Spread does not provide any control area services and it does not operate as a balancing authority area.

B. PRIOR ORDER NO. 676-H AND ORDER NO. 676-I COMPLIANCE

In late 2014, Golden Spread submitted a compliance filing in accordance with Order No. 676-H⁶ in Docket No. ER15-528-000.⁷ Subsequently, in an order issued on May 18, 2015, the Commission (i) conditionally accepted Golden Spread’s filing, including a request for waiver of WEQ-001,⁸ WEQ-002, WEQ-003, WEQ-008, WEQ-012 and WEQ-013, (ii) denied waiver of WEQ-011 and WEQ-000, and (iii) denied as moot requested waivers of WEQ-005 through WEQ-008, WEQ-015 and WEQ-021, that the Commission determined was unnecessary.⁹ With respect to item (iii), the Commission explained:

In the 676-H Rehearing Order, we clarified that

whenever a standard specifically states on its face that it only applies to certain types of entities, there is no need for any entity outside of that grouping (i.e., those to whom the requirement is not applicable) to obtain a waiver of the standard to be excused from compliance, as those standards clearly do not apply to them. This being the case, we shall hereafter dismiss as unnecessary any requests for waivers of standards that by their terms specifically apply only to entity groups (e.g., balancing authorities or western utilities or RTOs/ISOs) that the potential waiver requestor does not belong to during the time those standards are effective.

The Commission explained that including such standards in the public utility’s tariff will have no adverse effects on the company, since the standards would not impose the compliance obligation prescribed by the standard on that entity. The Commission stated that, in each public utility’s compliance filing in which it submits a tariff revision incorporating the NAESB standards, the public utility must

⁵ *Black Hills Power, Inc., et al.*, 135 FERC ¶ 61,058, P 48 (2011), *aff’d Golden Spread Electric Cooperative, Inc.*, Docket No. ER11-3404-002 (Jan. 24, 2014) (unpublished letter order).

⁶ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 148 FERC ¶ 61,205 (2014), *reh’g*, 151 FERC ¶ 61,046 (2015).

⁷ Order No. 676-H Compliance, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-000 (December 1, 2014).

⁸ With respect to WEQ-001, the Commission excluded Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2, and 001-106.2.5.

⁹ *Golden Spread Electric Cooperative, Inc.*, 151 FERC ¶ 61,142 (2015).

either incorporate by reference each standard or indicate in its tariff that it has obtained a waiver of that standard.^{10]}

Golden Spread's compliance filing was subsequently made¹¹ and accepted by the Commission,¹² and Attachment S of its Tariff contained the requisite reference to the NAESB WEQ standards referred to in Order No. 676-H as well as the list of standards for which waiver was granted.

On July 27, 2021, as amended on July 29, 2021 and October 21, 2021, Golden Spread submitted its Order No. 676-I compliance in Docket No. ER21-2513 *et al*, therein (i) proposing to adopt and incorporate by reference the list of NAESB WEQ standards set out in Order No. 676-I and 18 CFR § 38.1 (2020) and (ii) requesting continued waiver of standards WEQ-001, WEQ-002, WEQ-003, WEQ-008, WEQ-012 and WEQ-013.¹³ Golden Spread explained that good cause existed to continue such waivers of these NAESB standards because the circumstances under which the Commission originally granted the waivers to Golden Spread have not changed. Specifically, as referenced in its 2015 waiver order, “(1) [Golden Spread’s] transmission facilities remain limited and discrete; (2) those facilities still do not constitute an integrated transmission system; and (3) it still does not operate a balancing authority.”¹⁴ Golden Spread also explained that the Commission has consistently granted it waiver of the requirement to establish and maintain an OASIS, and the Commission also granted Golden Spread waiver of the Eastern Interconnection TLR Procedures.¹⁵

In an order issued on March 7, 2022, the Commission accepted Golden Spread’s compliance filing and granted the requested waivers of Business Practice Standards WEQ-001 (excluding WEQ-001-9 preamble text and WEQ-001-10 preamble text), WEQ-002, WEQ-003, WEQ-008, WEQ-0012 and WEQ-013.¹⁶ The Commission directed Golden Spread to submit a compliance filing to revise its OATT to include a citation to the order granting these waivers. Golden Spread did so on March 18, 2022 in Docket No. ER21-2513-003, and the Commission accepted that compliance filing on May 20, 2022.¹⁷

¹⁰ *Id.* at P 20, citing Order No. 676-H Rehearing Order, 151 FERC ¶ 61,046 at P 20.

¹¹ Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-001 (June 16, 2015); Amended Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-002 (July 10, 2015).

¹² *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-002 (unpublished letter order dated September 3, 2015).

¹³ Order No. 676-I Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER21-2513-000 (July 27, 2021); Errata to Order No. 676-I Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER21-2513-001 (July 27, 2021); Second Amendment to Order No. 676-I Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER21-2513-002 (October 21, 2021).

¹⁴ Order No. 676-I Compliance Filing, *citing* 151 FERC ¶ 61,142 at P 10 (citations omitted).

¹⁵ Order No. 676-I Compliance Filing, *citing Black Hills Power, Inc., et al.*, 135 FERC ¶ 61,058, P 48 (2011), *aff’d Golden Spread Electric Cooperative, Inc.*, Docket No. ER11-3404-002 (Jan. 24, 2014) (unpublished letter order); *Golden Spread Electric Cooperative, Inc.*, 139 FERC ¶ 61,067 (2012).

¹⁶ *Golden Spread Electric Cooperative, Inc.*, 178 FERC ¶ 61,160 at Para 17 and fn 28 (2022).

¹⁷ *Golden Spread Electric Cooperative, Inc.*, Docket No. ER21-2513-003 (May 20, 2022) (unpublished letter order);

Golden Spread submitted its first compliance filing in accordance with Order No. 676-J on May 10, 2022,¹⁸ and as of the date of this filing, that matter is still pending before the Commission

III. PROPOSED TARIFF REVISIONS AND REQUEST FOR CONTINUED WAIVER

In the instant compliance filing, and based on the Commission's earlier directives with respect to waivers of specific standards set out in Section II.B., above, Golden Spread proposes to adopt and incorporate by reference WEQ standards WEQ-004, WEQ-005, WEQ-007, WEQ-011, WEQ-015, WEQ-021, WEQ-022, and WEQ-023 version 003.3, as set out in Appendix I to Order No. 676-J and 18 CFR § 38.1 (2022). Golden Spread also requests continued waiver of WEQ-001, WEQ-002, WEQ-003, WEQ-008, WEQ-012, and WEQ-013 version 003.3 which are included in Appendix I to Order No. 676-J. Finally, Golden Spread proposes to correct a typographical error in Attachment S with respect to WEQ-000, which incorrectly lists the date of WEQ Version 003.3 as March 20, 2020 instead of the correct date of March 30, 2020.

Good cause exists to continue such waivers of these NAESB standards recently granted to Golden Spread on March 7, 2022. No circumstances that underlie either that determination or the determination previously made in 2015 have changed. Accordingly, continued waiver of these NAESB standards is appropriate as Golden Spread seeks to comply with Order No. 676-J.

The NAESB WEQ standards and the list of standards subject to the waiver will be incorporated in Attachment S to the Golden Spread OATT. Additionally, to the extent the implementation of WEQ-023 version 003.3 may require changes to Golden Spread's Attachment C – Methodology to Assess ATC based on the retirement of the MOD reliability standards, such changes will be submitted to the Commission under separate cover.

IV. ADDITIONAL INFORMATION

The following documents are included with this filing in addition XML-formatted data required by Order No. 714 for eTariff submission:

- | | | |
|--------------|---|-------------------------|
| Attachment A | – | Clean Tariff sheets. |
| Attachment B | – | Redlined Tariff sheets. |

Consistent with the instruction set out in Order No. 676-J, Golden Spread requests an effective date three months from the date of filing, January 27, 2023, within its eTariff records.

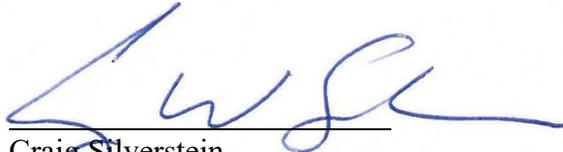
¹⁸ Compliance Filing, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER22-1841-000 (May 10, 2022).

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V. CONCLUSION

WHEREFORE, for the foregoing reasons, Golden Spread respectfully requests that the Commission accept the proposed Tariff revisions and continued waivers as described above. Please direct any questions or comments regarding this filing to the undersigned counsel.

Respectfully submitted,



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*Counsel for Golden Spread Electric
Cooperative, Inc.*

Attachments

ATTACHMENT S
NAESB WEQ STANDARDS

Transmission Provider hereby incorporates by reference the following standards promulgated by the NAESB Wholesale Electric Quadrant (WEQ), as set out in 18 C.F.R. § 38.1 (2022):

- (1) WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.1, September 30, 2015)(including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- (2) WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020);
- (6) WEQ-004, Coordinate Interchange (WEQ Version 003.3, March 30, 2020);
- (7) WEQ-005, Area Control Error Equation Special Cases (WEQ Version 003.3, March 30, 2020);
- (8) WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- (9) WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.3, March 30, 2020);
- (11) WEQ-011, Gas / Electric Coordination (WEQ Version 003.3, March 30, 2020);
- (14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.3, March 30, 2020);
- (15) WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.3, March 30, 2020);
- (16) WEQ-022, Electric Industry Registry (WEQ Version 003.3, March 30, 2020);
and
- (17) WEQ-023, Modeling (WEQ Version 003.3, March 30, 2020).

Transmission Provider has been granted waiver of the following NAESB WEQ standards in *Golden Spread Elec. Coop., Inc.*, _____ FERC ¶ _____ (_____):

- (3) WEQ-001, Open Access Same-Time Information Systems (OASIS), (WEQ Version 003.3, March 30, 2020);
- (4) WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), (WEQ Version 003.3, March 30, 2020);

- (5) WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, (WEQ Version 003.3, March 30, 2020);
- (10) WEQ-008, Transmission Loading Relief (TLR) - Eastern Interconnection (WEQ Version 003.3, March 30, 2020);
- (12) WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.3, March 30, 2020); and
- (13) WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, (WEQ Version 003.3, March 30, 2020).

ATTACHMENT S

NAESB WEQ STANDARDS

Transmission Provider hereby incorporates by reference the following standards promulgated by the NAESB Wholesale Electric Quadrant (WEQ), as set out in 18 C.F.R. § 38.1 (2022):

- (1) WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.1, September 30, 2015)(including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- (2) WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020);
- (6) WEQ-004, Coordinate Interchange (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020);
- (7) WEQ-005, Area Control Error (~~ACE~~) ~~Equation Special Cases~~ (~~{WEQ} Version 003.2, Dec. 8, 2017~~) Equation Special Cases (WEQ Version 003.3, March 30, 2020);
- (8) WEQ-006, Manual Time Error Correction (~~{WEQ} Version 003.1, Sept. 30, 2015~~);
- (9) WEQ-007, Inadvertent Interchange Payback (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020);
- (11) WEQ-011, Gas / Electric Coordination (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020);
- (14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020);
- (15) WEQ-021, Measurement and Verification of Energy Efficiency Products (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020);
- (16) WEQ-022, Electric Industry Registry (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (WEQ Version 003.3, March 30, 2020); and
- (17) WEQ-023, Modeling (~~{WEQ} Version 003.2, Dec. 8, 2017~~), including only: ~~standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A (WEQ Version 003.3, March 30, 2020).~~

Transmission Provider has been granted waiver of the following NAESB WEQ standards in *Golden Spread Elec. Coop., Inc.*, ~~178~~ _____ FERC ¶ ~~61,160~~ _____ (2022 _____):

- (3) WEQ-001, Open Access Same-Time Information Systems (OASIS), ~~-(WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text;~~
- (4) WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), ~~-(WEQ Version 003.3, March 30, 2020);~~
- (5) WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, ~~[OASIS] Version 2.2 ([WEQ] Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019) (WEQ Version 003.3, March 30, 2020);~~
- (10) WEQ-008, Transmission Loading Relief (TLR) - Eastern Interconnection ~~-(WEQ] Version 003.2, Dec. 8, 2017) (WEQ Version 003.3, March 30, 2020);~~
- (12) WEQ-012, Public Key Infrastructure (PKI) ~~-(WEQ] Version 003.2, Dec. 8, 2017).~~ (WEQ Version 003.3, March 30, 2020); and
- (13) WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, ~~[OASIS] Version 2.2 ([WEQ] Version 003.2, Dec. 8, 2017).~~ (WEQ Version 003.3, March 30, 2020).

CERTIFICATE OF SERVICE

I hereby certify that I have served this day copies of the foregoing to be sent via electronic or first class mail in accordance with Rule 2010 of the Commission Rules of Practice and Procedure.

Dated at Washington, D.C., this 27th day of October, 2022.



Craig W. Silverstein