



**Interconnection Facilities Study  
For  
Generator Interconnection  
Request  
GEN-2013-027  
(IFS-2014-002-02)**

***SPP Generator  
Interconnection Studies***

***(#GEN-2013-027)  
(#IFS-2014-002-02)***

**November 2015**

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## Revision History

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Date	Author	Change Description
9/15/2015	SPP	Draft Interconnection Facilities Study Report Revision 0 Issued
11/9/2015	SPP	Final Interconnection Facilities Study Report Revision 1 Issued

## **Summary**

Southwestern Public Service Company (SPS), an operating company subsidiary of Xcel Energy Inc., performed a detailed Interconnection Facilities Study (IFS) at the request of Southwest Power Pool (SPP) for Generator Interconnection request GEN-2013-027/IFS-2014-002-02 (150.00 MW/Wind) located in Bailey County, Texas. The Interconnection Customer's originally proposed in-service date for GEN-2013-027/IFS-2014-002-02 is March 31, 2016. SPP has proposed the full interconnection service in-service date will be after the assigned Transmission Owner Interconnection Facilities, Non-Shared Network Upgrade(s), and Shared Network Upgrade(s) are completed. Full Interconnection Service will require the Network Upgrade(s) listed in the "Other Network Upgrades" section. The request for interconnection was placed with SPP in accordance with SPP's Open Access Transmission Tariff, which covers new generation interconnections on SPP's transmission system.

## **Phases of Interconnection Service**

It is not expected that interconnection service will require phases however, interconnection service will not be available until all interconnection facilities and network upgrades can be placed in service.

## **Interconnection Customer Interconnection Facilities**

The Interconnection Customer's generation facility consists of sixty-five (65) Siemens 2.3 MW wind turbines with four (4) of the sixty-five (65) Siemens 2.3 MW wind turbines including an additional wind turbine vendor "Power Boost" feature that will increase generator nameplate rating from 2.3 MW to 2.415 MW. The total nameplate rating for GEN-2013-027/IFS-2014-002-02 is 149.96 MW. The 34.5kV collector system for this wind facility is planned to be connected to one (1) 230/34.5kV Interconnection Customer owned and maintained transformer at the Interconnection Customer owned substation. An approximate three (3) mile overhead 230kV transmission circuit will connect GEN-2013-027/IFS-2014-002-02 to the Point of Interconnection (POI) at a new SPS owned switching station (Needmore) tapping and looping into the existing SPS owned Tolk - Yoakum 230kV transmission circuit. This new switching station, Needmore, will be location approximately seventeen (17) miles from Tolk Substation along the Tolk - Yoakum 230kV transmission circuit. The Interconnection Customer will be responsible for all of the transmission facilities connecting the Interconnection Customer owned substation to the POI.

The Interconnection Customer will be responsible for any equipment located at the Customer substation necessary to maintain a power factor of 0.95 lagging to 0.95 leading at the POI, including approximately 6.4 Mvar<sup>1</sup> of reactors to compensate for injection of reactive power from GEN-2013-027/IFS-2014-002-02 Interconnection Customer Facilities into the transmission system under reduced generating conditions. Also, the Interconnection Customer will need to coordinate with the Transmission Owner for relay, protection, control, and communication system configurations.

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<sup>1</sup> This approximate amount of reactors is an approximate minimum amount needed for the configuration of the wind farm studied in DISIS-2014-002 Group 06 reduced generation analysis.

### Transmission Owner Interconnection Facilities and Non-Shared Network Upgrade(s)

To allow interconnection the Transmission Owner will construct a new three breaker ring bus switching station (Needmore) with three (3) 3000A continuous ampacity 230kV circuit breakers and associated terminal equipment for acceptance of the Interconnection Customer's Interconnection Facilities. Currently, SPS estimates an Engineering and Construction (E&C) lead time of approximately thirty-six (36) months after a fully executed Generator Interconnection Agreement (GIA) for the completion of Transmission Owner Interconnection Facilities and Non-Shared Network Upgrades. At this time, GEN-2013-027/IFS-2014-002-02 is responsible for \$6,004,592 of Transmission Owner Interconnection Facilities and Non-Shared Network Upgrade(s). **Table 1** displays the estimated costs for Transmission Owner Interconnection Facilities and Non-Shared Network Upgrade(s).

**Table 1: GEN-2013-027/IFS-2014-002-02 TOIF and Non-Shared Network Upgrade(s)**

Transmission Owner Interconnection Facilities and Non-Shared Network Upgrades Description	Allocated Cost (\$)	Allocated Percent (%)	Total Cost (\$)
<b>Interconnection Substation - Transmission Owner Interconnection Facilities</b> 230kV Substation work for a new line terminal position, line switch, dead end structure, communications, revenue metering, and line arrestors	\$260,000	100%	\$260,000
<b>Interconnection Substation - Network Upgrade(s)</b> 230kV Substation work for a new 3-breaker ring configuration switching station, build three (3) 3000A continuous ampacity 230kV circuit breakers and associated switches, structures, other terminal equipment.	\$5,744,592	100%	\$5,744,592
<b>Total</b>	<b>\$6,004,592</b>	<b>100%</b>	<b>\$6,004,592</b>

### Shared Network Upgrade(s)

The Interconnection Customer was studied within the DISIS-2014-002 Impact Study with Energy Resource Interconnection Service (ERIS)/ Network Resource Interconnection Service (NRIS). The Interconnection Customer was studied within the DISIS-2014-002-1 Impact Restudy, DISIS-2014-002-2 Impact Restudy, and DISIS-2014-002-4 Impact Restudy with Energy Resource Interconnection Service (ERIS) only. Cost Allocation was updated in DISIS-2014-002-3 Impact Restudy. At this time, the Interconnection Customer is allocated \$9,179,172 for Shared Network Upgrades. If higher queued interconnection customers withdraw from the queue, suspend or terminate their GIA, restudies will have to be conducted to determine the Interconnection Customers' allocation of Shared Network Upgrades. All studies have been conducted on the basis of higher queued interconnection requests and the upgrades associated with those higher queued interconnection requests being placed in service. At this time, the Interconnection Customer is allocated the following cost for Shared Network Upgrade:

**Table 2: GEN-2013-027/IFS-2014-002-02 Shared Network Upgrade(s)**

Shared Network Upgrades Description	Allocated Cost (\$)	Allocated Percent (%)	Total Cost (\$)
<b>Tolk – Plant X 230kV Circuit #1 &amp; #2:</b> Rebuild Tolk – Plant X circuits #1 and #2	\$3,620,985	36.5	\$9,921,693
<b>TUCO 2 Substation (Crawfish Draw) and 345/230kV Transformer:</b> Build new 345/230kV substation and transformer approximately 4 miles from TUCO substation. Tap and re-terminate TUCO – Border 345kV and TUCO – Swisher into new station.	\$5,558,187	22.4	\$24,764,205
<b>Total</b>	<b>\$9,179,172</b>		<b>\$34,685,898</b>

### **Other Network Upgrades**

Certain Other Network Upgrades are currently not the cost responsibility of the Customer but will be required for full Interconnection Service. Currently, the following Other Network Upgrades are assigned to GEN-2013-027/IFS-2014-002-02:

- Agave Hill 115kV Reactive Power Support build assigned in 2015 Integrated Transmission Plan Near Term Assessment (ITPNT) per SPP-NTC-C-200324
- China Draw 115kV Reactive Power Support build assigned in 2015 Integrated Transmission Plan Near Term Assessment (ITPNT) per SPP-NTC-C-200324
- Ochoa 115kV Reactive Power Support assigned in 2015 Integrated Transmission Plan Near Term Assessment (ITPNT) per SPP-NTC-C-200324
- Potash Junction Project 230/115kV assigned in High Priority Increment Load Study (HPILs) per SPP-NTC-200282 with current on schedule 12/1/2015 in-service
- Road Runner 115kV Reactive Power Support assigned in 2015 Integrated Transmission Plan Near Term Assessment (ITPNT) per SPP-NTC-C-200324

Depending upon the status of higher or equally queued customers, the Interconnection Customer's in-service date is at risk of being delayed or their Interconnection Service is at risk of being reduced until the in-service date of these Other Network Upgrades.

### **Conclusion**

Interconnection Service for GEN-2013-027/IFS-2014-002-02 will be delayed until the Transmission Owner Interconnection Facilities and Non-Shared Network Upgrades are constructed. The Interconnection Customer is responsible for \$6,004,592 of Transmission Owner Interconnection Facilities and Non-Shared Network Upgrades. At this time, the Interconnection Customer is allocated \$9,179,172 for Shared Network Upgrades. After all Interconnection Facilities and Network Upgrades have been placed into service,

Interconnection Service for 150.00 MW, as requested by GEN-2013-027/IFS-2014-002-02, can be allowed.

At this time the total allocation of costs assigned to GEN-2013-027/IFS-2014-002-02 for interconnection Service are estimated at \$15,183,764.



**Facilities Study For  
Southwest Power Pool (SPP)**

Bailey County, Texas

GEN-2013-027

150MW Wind Farm

Generation Facilities

March 24, 2015

Transmission Planning South  
Xcel Energy Services

## Executive Summary

("Interconnection Customer") in 2015 requested an interconnection of a wind energy facility located in Bailey County, Texas to the Southwestern Public Service Company (SPS) transmission network. SPS is a New Mexico Corporation and wholly owned subsidiary of Xcel Energy Inc. This facility has a net capacity of 150 MW. The Interconnection Customer's facility will connect to SPS's existing Tolk to Yoakum 230 kV transmission line which is located approximately seventeen (17) miles south of Tolk Station. The Interconnection Customer's requested commercial operation date is October 2016.

The Southwest Power Pool (SPP) evaluated the request (GEN-2013-027) to interconnect the wind generation facility to the SPS transmission system in a Definitive Interconnection System Impact Study (DISIS-2014-002), which was completed in January 2015. The interconnection request was studied using sixty-five (65) turbines, which are Siemens 2.3MW wind turbines, with four (4) of the sixty-five (65) turbines with the "Power Boost" feature to increase output to 2.415MW for a total of 149.96 MW. The Interconnection Customer is required to build a 230 kV transmission line from their substation wind farm facility to a new SPS Switching Station to be named Needmore. The Interconnection Customer will be required to maintain a Power Factor between 0.95 lagging and 0.95 leading at the Point of Interconnection (POI).

SPP requires that each generator shall implement Automatic Under Frequency Load Shedding (UFLS) according to the SPP UFLS Plan at the following link: [http://www.spp.org/publications/SPP%20UFLS%20Plan\\_Final.pdf](http://www.spp.org/publications/SPP%20UFLS%20Plan_Final.pdf). To fulfill this requirement, coordination with Xcel Energy is required during the under-frequency relay-setting phase for the generation. The Interconnection Customer is required to report their generation off-nominal frequency tripping relay settings to SPP and SPS. SPS specifies that generators shall not trip at frequencies above 58.5 Hz unless exceptions in the Transmission Provider Criteria are met. The Interconnection Customer agrees that the energy generating units installed at this interconnection will not be tripped for under-frequency conditions above 58.5 Hz in compliance with Transmission Provider criteria. This means that the generation subject to this Interconnection Agreement may not trip for under-frequency conditions on the transmission system until all under-frequency load shedding relays have operated. SPS will also require that the Interconnection Customer be in compliance with all applicable criteria, guidelines, standards, requirements, regulations, and procedures issued by the North American Electric Reliability Corporation (NERC), SPP, and the Federal Energy Regulatory Commission (FERC) or their successor organizations.

The Interconnection Customer is responsible for all the cost of the Interconnection Facilities, installation of the Direct Assigned Interconnection Facilities; inclusive of all construction required for the 230 kV to interconnect at SPS's Needmore Switching Station.

The network upgrades for the Interconnection at Needmore is \$5,744,592.

It is anticipated that the entire process of building a new 3-ring 230 kV switching station at Needmore for the acceptance of the GEN-2013-027 facility output and the network upgrades allocated to this project will require approximately 36 months to complete after an Interconnection Agreement is signed and an authorization to proceed is received. The cost of these upgrades, inclusive of the Interconnection Customer's cost for the interconnection of this Wind Farm facility, is shown below in Table 1, with the detailed description of the cost shown in Table 3.



**Table 1, Cost Summary<sup>a</sup>**

	Network Upgrades:	<b>\$ 5,744,592</b>
	Transmission Owner Interconnection Facilities:	<b>\$ 260,000</b>
	Total:	<b>\$ 6,004,592</b>

<sup>a</sup> The cost estimates are 2013 dollars with an accuracy level of ±20%.

## General Description of SPS<sup>b</sup> Facilities

1. **Construction of New Needmore Switching Station:** See Appendix A, Figure A-1 for general vicinity location map.
  - 1.1. **Location:** Customer will build a new 230 kV line from their substation to SPS's new 230 kV Needmore Switching Station which includes three (3) 230 kV breakers. Appendix A, Figure A-2, shows a preliminary one-line of Needmore Switching Station, while Figure A-3 shows a typical elevation view of the normal Point of Interconnection (POI).
  - 1.2. **Bus Design:** The new 230 kV three-breaker ring-bus switching station will be built to accommodate the output from the wind energy facility. This is shown in Appendix A, Figure A-2.
  - 1.3. **Line Terminals:** The 230 kV lines and static wire terminals will be designed to accommodate 14,000 pounds per phase conductor (28,000 Bundle) at maximum tension, with a maximum 15-degree pull off from normal.
  - 1.4. **Control House:** The new control house will accommodate the new metering, protective relaying and control devices, terminal cabinets, and any fiber-optic cable terminations, etc. for the new 230 kV line breaker terminals.
  - 1.5. **Security Fence:** The switching station will have a 7 foot chain-link fence with steel posts set in concrete with 1-foot of barbed wire on the top in a "V" configuration. The enclosed area will be approximately 400' x 400', with a rock yard surface.
  - 1.6. **Ground Grid:** A complete ground grid will be installed per ANSI/IEEE STD 80-1986, with our standard 4/0 copper ground mesh on 40-foot centers with ground rods and 20-foot centers in corners and loop outside of fence.
  - 1.7. **Site Grading:** Company contractor, per company specifications, will perform any site grading and erosion control to accommodate the new line terminal. Soil compaction shall be not less than 95% of laboratory density as determined by ASTM-D-698.
  - 1.8. **Station Power:** A 133 kV/120-240volt transformer tapped off of the 230 kV bus will provide station power. A backup station power source will be taken from local distribution if it is available or a generator will be installed if none is available. A flip-flop to automatically transfer the station power will be installed.
  - 1.9. **Relay and Protection Scheme:** The new 230 kV breaker line terminal primary protection to the interconnection customer 230 kV transmission line will use line current differential relaying over optical fiber installed in the static of the customer's 230 kV transmission line. Secondary relaying will use mirrored bit, Permissive Overreaching Transfer Trip (POTT) over the optical fiber. An SEL 311L and an SEL 421 will be used as primary and secondary relays, respectively. The SEL 421 will be used for line/bus SCADA closing conditions for the 230 kV breakers. Also, a SEL 351S will be used for breaker failure.

An SEL 421 will display the bus voltage, GCB amps, MW, MVAR, and fault location. A communication relay will be installed and for other functions as required.

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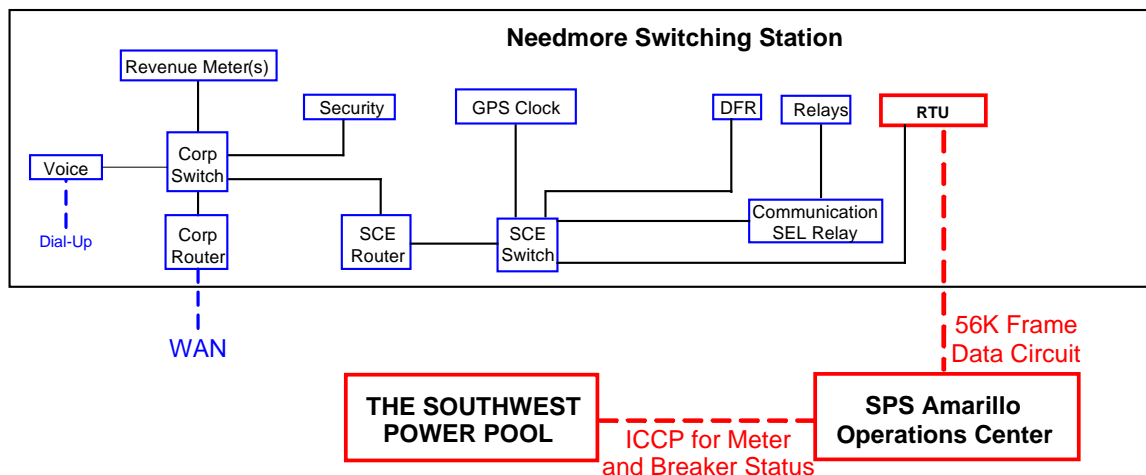
<sup>b</sup> All modifications to SPS facilities will be owned, maintained and operated by SPS.

- 1.10. Revenue Metering:** An individual billing meter will be installed at Needmore Switching Station on the 230 kV line terminal from the Interconnection Customer's substation, which meets the standards: ANSI C12.1 accuracy class 0.2 (3-PT's IEEE C57.13 accuracy class 0.3 and 3-CT's IEEE C57.13 accuracy class 0.15) for full 3-phase 4-wire metering. There will be two meters per line terminal: one will be primary and the other will be back up, each will have full 4 quadrant metering. Pulses out of the primary billing meter will be sent via SCADA to the Transmission Owner's Control Center in Amarillo, Texas.
- 1.11. Disturbance Monitoring Device:** A Disturbance Fault Recorder (DFR), capable of recording faults, swings, and long term trending, will be installed to monitor and record conditions in the substation and on the transmission lines. The disturbance equipment shall also be equipped with a GPS time synching clock. This equipment will have communication capability with a dedicated communication circuit. The disturbance equipment will have its own dedicated communications circuit.
- 1.12. Remote Terminal Unit (RTU):** A new RTU will be utilized with communications for the new switching station. A Communication SEL Relay will be installed for relay communications and other functions as required. SPS will provide and install an RTU for metering and telemetry at the Interconnection Customer's facility as required by the latest Xcel Energy Interconnection Guidelines. The direct cost will be charged to the Interconnection Customer.

- 1.13. Communications:** To meet its Communications obligations, the Interconnection Customer shall be responsible for making arrangements with the local phone company to provide telephone circuits as required by the Transmission Owner. Transmission Owner equipment may include, but is not limited to, the following: relay communication equipment, RTU, and disturbance monitoring equipment. Prior to any construction, the Interconnection Customer is required to contact the Transmission Owner substation-engineering department for all communication details.

The following communications schematic diagram, which includes communication equipment information for the Interconnection Customer, Transmission Provider (Southwest Power Pool) and Transmission Owner (Southwestern Public Service), is provided to assist the Parties.

A schematic outlining the proposed communications is provided below:



Interconnection Customer shall be responsible for providing fiber optic communication circuit installed in the overhead transmission line static wire for protective relaying from the customer substation to Needmore Switching Station.

## 2. Transmission Work:

- 2.13. The Interconnection Customer will construct, own, operate, and maintain any customer owned 230 kV transmission line from the Interconnection Customer's substation to the Interconnection Point at SPS's new 230 kV Switching Station. This line is shown in Appendix A, Figure A-1 and is approximately 2.5 miles from customer's substation POI. **The SPS transmission design group prior to any construction by the Interconnection Customer or its contractor on any customer 230 kV transmission lines, or doing work in close proximity to any SPS transmission line, will require an engineering review of the customer's design. It is the Interconnection Customer's responsibility to initiate the design review in a timely manner before construction of any transmission line begins. If the review has not been made or the design at any of the aforementioned locations is deemed inadequate, the crossing(s) and or termination into the interchange will be delayed until the matters are resolved. SPS will not be held responsible for these delays.**

2.1 .

## 3. Right-Of-Way:

- 3.1 **Permitting:** Permitting for the construction of a new 230 kV line terminal at the new 230 kV Switching Station is not required from the Public Utility Commission in the State of Texas. The interconnection customer will be responsible for any permitting and right of way of their substation and the 230 kV transmission line from their substation to the Interconnection Point at new 230 kV Switching Station.

4. **Construction Power and Retail Service:** It is the sole responsibility of the Interconnection Customer to make arrangements for both construction and station power, which may be required for the Interconnection Customer's wind farm facility. **Additionally, if the Interconnection Customer's substation(s) and/or construction site(s) are located outside of the SPS service area, SPS cannot provide station power (retail service) and the Interconnection Customer needs to make arrangements for retail service from the local retail provider. Retail provider and Customer will be responsible for making any necessary transmission service arrangements as required under the SPP OATT.**

## 5. Project and Operating Concerns:

- 5.1 Close work between the Transmission group, the Interconnection Customer's personnel and local operating groups will be imperative in order to meet any in-service date that has been established.
- 5.2 The Interconnection customer will be required to maintain a Power Factor between 0.95 lagging and a 0.95 leading at the Point of Interconnection (POI). All capacitors required will be installed on the 34.5 kV at customer's substation. This is required to maintain acceptable dynamic voltage rise as per latest revision of the Xcel Energy Interconnection Guidelines for Transmission Interconnection Producer-Owned Generation Greater than 20 MW. The capacitor banks need to be switched in stages where the voltage rise is less than 3%.

- 6 **Fault Current Study:** The available fault current at the interconnection location on the 230 kV at Needmore Switching Station located approximately 17 miles south of Tolk Station on circuit K-25, without any contribution from the new generator facilities, is shown in Table 2.

**Table 2, - Available fault current at interconnection location**

Short Circuit Information without contribution from new Generator Facilities (GEN 2013-027)				
Fault Location	Fault Current (Amps)		Impedance ( $\Omega$ )	
	Line-to-Ground	3-Phase	$Z^+$	$Z^0$
230 kV Bus	6,015	8,587	$2.31 + j15.35$	$8.43 + j34.57$

## Estimated Construction Costs

The projects required for the interconnection of 150 MW Wind Generation facilities consist of the projects summarized in the table below.

**Table 3, Required Interconnection Projects<sup>c</sup>**

Project	Description	Estimated Cost
	<b>Network Upgrades (at the Interconnection Customer's expense)</b>	
2	Communication Equipment (DFR, RTU and other related items)	\$ 409,894
3	Land Approximately 20 acre	\$ 144,698
4	Build new 3-ring bus for new Needmore switching Station with three new 230 kV breakers.	\$ 5,190,000
	<b>Subtotal:</b>	<b>\$ 5,744,592</b>
	<b>Transmission Owner Interconnection Facilities (at the Interconnection Customer's expense)</b>	
5	Communications <sup>d</sup>	\$ See footnote
6	Revenue metering	\$ 230,000
7	230 kV Line arrestors	\$ 30,000
	<b>Subtotal:</b>	<b>\$ 260,000</b>
	<b>Total Cost</b>	<b>\$ 6,004,592</b>

## Engineering and Construction:

An engineering and construction schedule for this project is estimated at approximately 36 months. Other factors associated with clearances, equipment delays and work schedules could cause additional delays. This is applicable after all required agreements are signed and internal approvals are granted.

All additional cost for work not identified in this study is the sole responsibility of the Interconnection Customer unless other arrangements are made.

<sup>c</sup> The cost estimates are 2015 dollars with an accuracy level of ±20%.

<sup>d</sup> It is the Requester's responsibility to provide both the data circuit and communication circuits, see Section 1.13.

## Appendix A



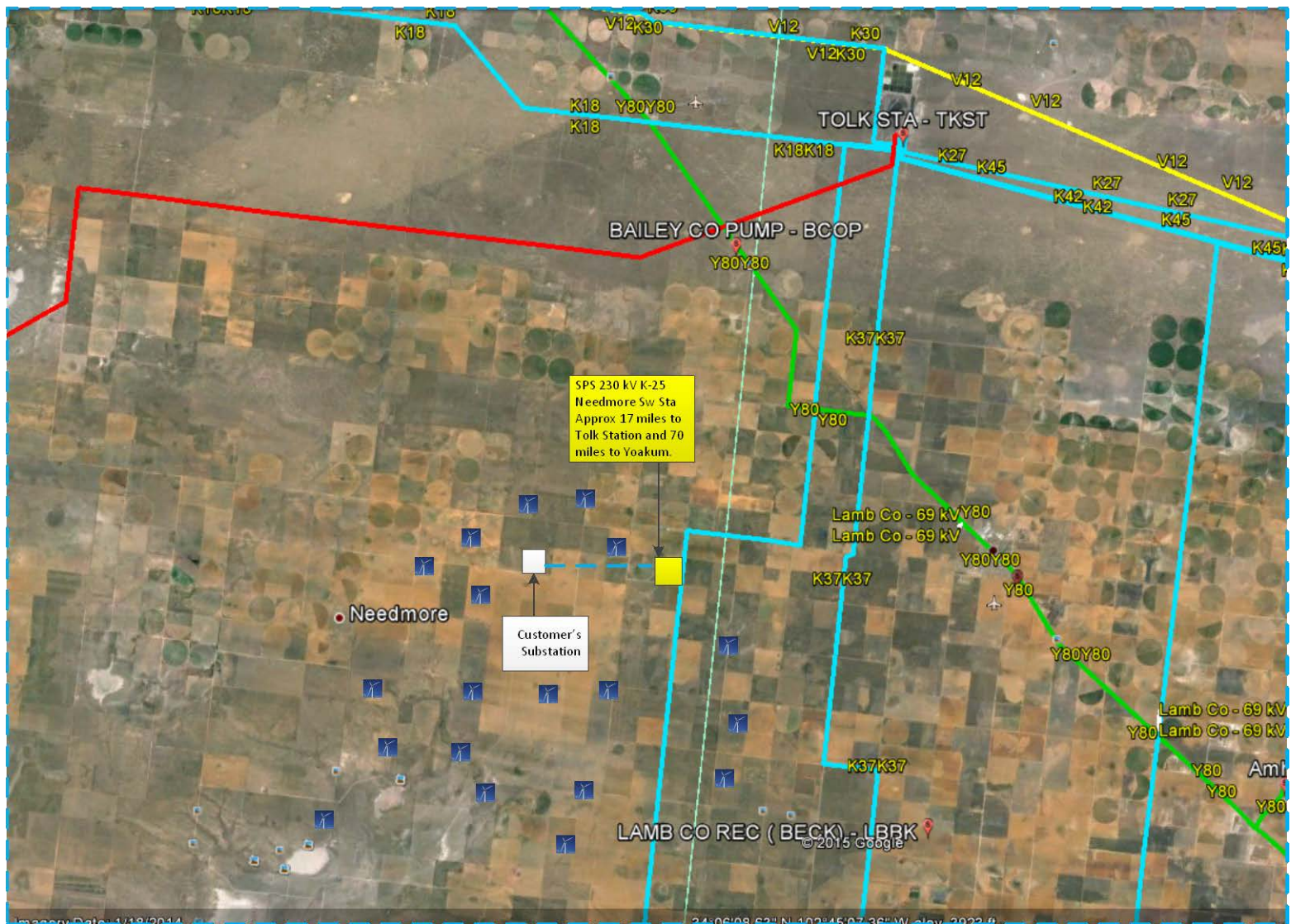


Figure A-1. Approximate location of Needmore Switching Station and Wind Farm

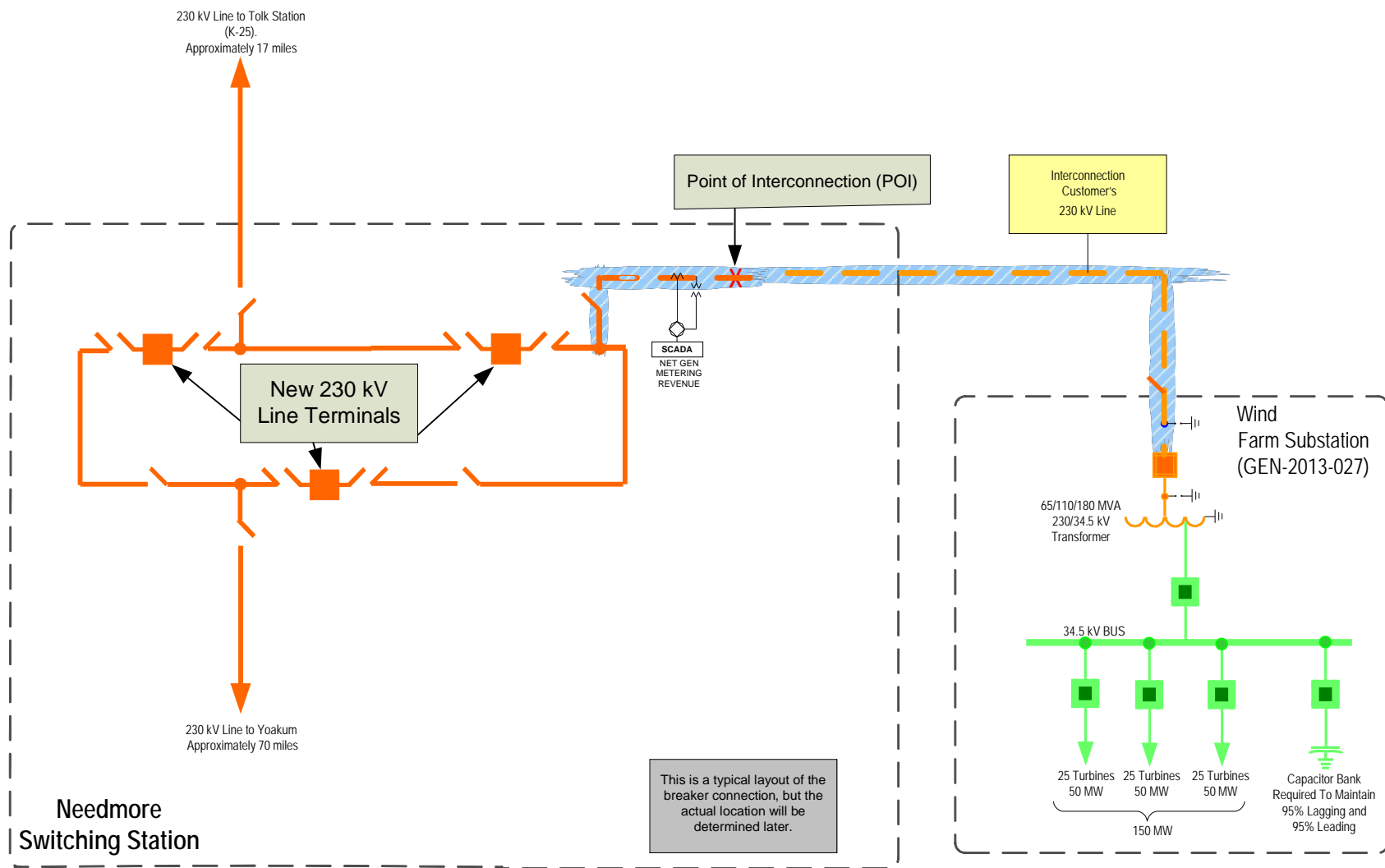


Figure A-2. One-line Diagram of New Needmore Switching Station

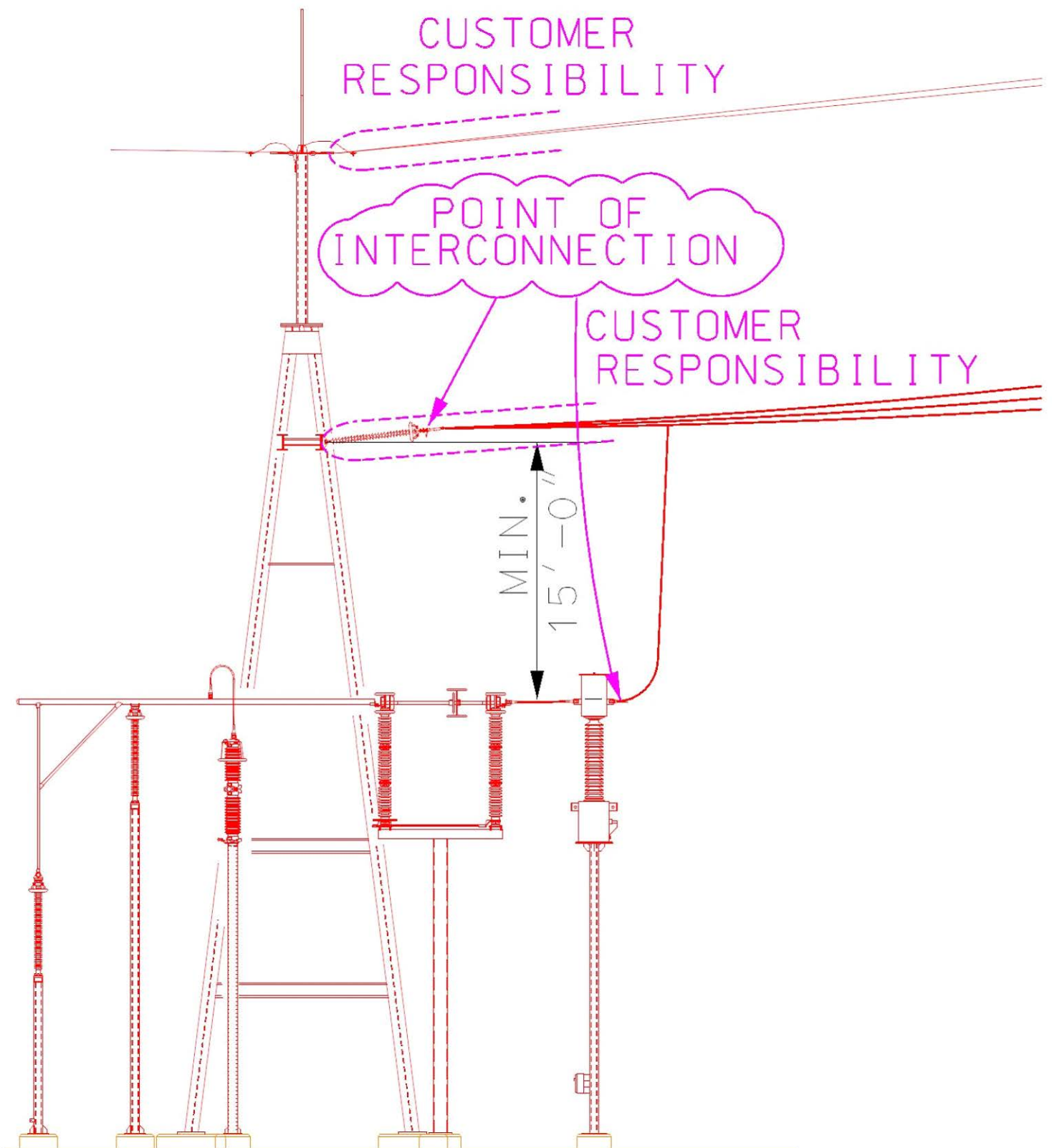


Figure A-3 Point of Interconnection & Change of Ownership (Typical)

*– END OF REPORT –*

# IFS Comments

Omitted Text

## G2013-0027

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In September 2015, SPP issued the IFS Report for DISIS 2014-002-002. UC Synergetic, LLC acting as the technical consultant for Omitted Text requested all cases, contingency files, subsystem files, and associated other files used to perform the analysis for the IFS for review. Originally, comments for the Interconnection Facility Study (IFS) were due on October 15, 2015. Due to a late withdrawal from one of the participants in the IFS cluster, SPP extended the due date for comments to October 22, 2015.

Below are the comments provided after review of all information provided by SPP.

1. The IFS indicates (2) 150MVar SVC's are needed at the Oklaunion 345kV bus to prevent low voltage issues associated with the outage of Border - Woodward 345kV transmission line. The anticipated cost of the SVC's is \$40M with \$8,278,674 being the responsibility of Omitted Text
  - a. UCS was able to duplicate the steady state low voltage condition at the Oklaunion 345kV bus associated with the Border – Woodward 345kV transmission line outage in the 2015 Spring case when the existing 90 MVar switchable shunt is open and no additional switchable shunts are modeled. No other cases indicated a low voltage condition for this outage with the existing 90 MVar switchable shunt open.
  - b. SPP has never provided a power flow case with an SVC modeled at this bus to substantiate their claim that an SVC is required to support voltage from either a steady state or dynamic perspective.
  - c. SPP has provided study cases with approximately 110MVar's of additional switchable shunts modeled at the Oklaunion 345kV bus. These were modeled in the DISIS-2014-002-02 cases.
  - d. The DISIS 2014-002-02 Report dated July 2015, is a restudy of cluster group 6 that includes GEN\_013\_027. This report listed the requirement for reactive support at Oklaunion 345kV bus as "110MVar Capacitor Bank(s) and+50Mvar/-50 Mvar SVC". The DISIS 2014-002-3 reported dated September 2015 is a restudy of cluster group 3 that excludes GEN\_013\_027. This report listed the requirement for reactive support at Oklaunion 345kV bus as "Install (2) 150Mvar SVCs at Oklaunion".
    - i. We were not studied in DISIS 2014-002-3 and the report specifically states "The Group 6 stability analysis was not performed again for this restudy. The original analysis in DISIS 2014-002-2 is still valid."
    - ii. As the result of the DISIS 2014-002-3, SPP changed the equipment needed at Oklaunion, the upgrade costs, and the allocated cost to all projects without performing a detailed study. Neither DISIS 2014-002-2 nor DISIS 2014-002-3 demonstrated the requirement to modify the specified equipment and upgrade costs. Because GEN\_013\_027 was not a part of the DISIS 2014-002-3 restudy, cost allocations should not have changed for the Omitted Text



2. The IFS indicates a new substation (Crawfish Draw - aka, Tuco 2) and the addition of a new 345/230kV transformer need to be constructed at a cost of \$24,764,205 with \$5,322,161 being allocated to Omitted
  - a. The overloads that precipitate the need for the new substation and transformer are present prior to the Tuco – Yoakum - Hobbs 345kV line being placed in-service. This line is part of a large series of 345kV and 230kV improvements and is anticipated to be in service by 2018 per testimony provided by the Manager of Transmission Planning for Southwestern Public Service, John S. Fulton, before the Public Utilities Commission of Texas in April of 2014. Once this line (and associated improvements) is placed in service the overloads are no longer present.
    - i. Good utility practice suggests that for temporary issues, Special Protection Schemes (SPS) or Remedial Action Schemes (RAS) are acceptable alternatives to new construction or permanent upgrades.
    - ii. SPP never offered to implement an SPS/RAS for this overload.
    - iii. The addition of the 345 kV SPP Transmission Expansion Plan (STEP) improvements that include the Tuco – Yoakum 345 kV line address the transformer contingency loading issue and essentially eliminate the need for the third transformer and Crawfish Draw Substation. These projects have been identified by SPP as high priority to serve load.

## Conclusions

Due to the issues presented above, Omitted has not been provided any substantiation for the allocated costs for Static Var Compensator (SVC) upgrades at Oklaunion or a new substation and transformer at Crawfish Draw. Additionally, Omitted is still seeking a joint meeting with Southwestern Public Service Company and SPP to discuss the project schedules and the cost of improvements. Omitted is also interested to understand how the cost to rebuild the Plant X – Tolk 230kV Lines will be handled by SPS in their rates. Omitted would prefer that the cost of these improvements to the two lines be rolled into the SPS rate base, because tracking the use of the new 230 kV Lines would appear to be a daunting task. Alternatives to the SVC upgrades and Crawfish Draw Substation and associated 345/230kV transformer are presented below.

### Oklaunion

The addition of 110MVar of switchable shunts at the Oklaunion 345kV bus to prevent under-voltage conditions for the outage of Border – Woodward 345kV transmission line. The estimated cost of this upgrade is approximately \$2M. Based on the GEN-2013-027-IFS-2014-002-02 report, Omitted allocated cost would be approximately \$414,000 which represents the 20.70% listed in the report. Based on the Omitted review of the cases and contingencies studies 210 MVars of switchable capacitance in multiple steps is sufficient to maintain voltage at Oklaunion.

### Crawfish Draw Substation and Transformer

A temporary Special Protection Scheme (SPS) / Remedial Action Plan (RAP) to curtail plant output in the event of a loss of either of the existing transformers. A Limited Operation Analysis would probably need to be conducted to determine maximum output of the generators when the SPS is activated. The estimated cost to implement the SPS/RAS is approximately \$500,000. Based on the GEN-2013-027-IFS-2014-002-02 report, Omitted allocated cost would be approximately

\$107,450 which represents the 21.49% listed in the report. The SPS would be retired commensurate with the cut in of the Yoakum – Tuco 345 kV Line.

## Next Steps

1. A joint meeting between **Omitted** SPP, and Southwestern Public Service to discuss outstanding issues relating to Build Out/Upgrades, potential SPS for in lieu of the Crawfish Draw substation, and the upgrades to the Tolk – Plant X 230kV circuits.
2. Meeting to discuss the IFS comments provided to SPP. This can be done during the joint call with Southwestern Public Service if all parties agree.
3. Results of the current restudy due to the drop out of 2014-066
4. Comments from review of restudy

## **SPP Response to GEN-2013-027 Interconnection Customer comments**

Listed below are SPP responses to the Interconnection Customer comments to the Interconnection Facilities Study for GEN-2013-027.

- Most of Interconnection Customer comments are not in response to the Interconnection Facilities Study that was posted in September, 2015. Instead, Interconnection Customer has focused most of its comments upon the latest DISIS study that GEN-2013-027 was studied in (DISIS-2014-002-2).
- SPP has met via conference call with Interconnection Customer on three separate occasions since the posting of the Interconnection Facilities Study.
- SPP has provided Interconnection Customer with all files that it has requested. SPP has pointed out to Interconnection Customer in one of the calls that the information pertaining to the Oklahoma reactive power support is contained in the models for DISIS-2014-002-2.
- Interconnection Customer references the study for DISIS-2014-002-3, which was a restudy of the Group 3 requests. GEN-2013-027 was not studied in DISIS-2014-002-3. The latest cost allocation for all requests in DISIS-2014-002 was updated in the DISIS-2014-002-3 study report. The costs for GEN-2013-027 came from the Interconnection Facilities Study.
- As of November 2, 2015 - SPP has now posted DISIS-2014-002-4 due to withdrawals in the queue. DISIS-2014-002-4 no longer assigns Oklahoma reactive power requirements to GEN-2013-027. These results are incorporated into the Final Interconnection Facilities Study.
- Interconnection Customer's proposal for a special protection scheme (SPS) to be installed to mitigate the overload on the Tuco 345/230kV transformers is not appropriate for the following reasons –
  - An SPS is not effective – The Tuco 345/230kV transformers overload in light load seasons when there is not enough load in Southwestern Public Service to absorb all available wind generation. The 2020 Winter Peak snapshot (winter peak) indicates that the Tuco transformers will overload after the completion of the Tuco-Yoakum-Hobbs 345kV line in June, 2020. Loads that are lower than the winter peak (as in spring, fall and winter off-peak) can also be expected to produce similar overloads.
    - SPP has also performed further analysis on a 2020 light load model
  - An SPS does not appear to be feasible – Interconnection Customer did not propose an actual scheme that would implement its plan. Discussions with Interconnection Customer indicated that a communication scheme involving fiber would be necessary. However, no scheme has been developed.
  - An SPS would need the approval of the impacted Transmission Owner, who has not indicated that it would approve.
    - Additionally, an SPS would need the approval of all appropriate SPP Working Groups (SPCWG, TWG, ORWG) and Committees (MOPC).
- SPP and Southwestern Public Service discussed with Interconnection Customer its concerns of the Plant X – Tolk 230kV rebuilds. SPP explained the cost of the rebuilds would be credited back to Interconnection Customer through Attachment Z2. Interconnection Customer had further questions about the tariff surrounding the Z2 crediting mechanism. SPP will provide a regulatory contact for Interconnection Customer.