

Report on

GEN-2017-077 Modification Request Impact Study

Revision R1 May 12, 2025

Submitted to
Southwest Power Pool



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Revision History

DATE OR VERSION NUMBER	AUTHOR	CHANGE DESCRIPTION
05/12/2025	Aneden Consulting	Initial Report Issued



Executive Summary

Aneden Consulting (Aneden) was retained by the Southwest Power Pool (SPP) to perform a Modification Request Impact Study (Study) for the GEN-2017-077 project, an active Generation Interconnection Request (GIR) with a Point of Interconnection (POI) at the Cooyyah 138 kV Substation (EXCLART4 in the DISIS-2021-001 models).

The GEN-2017-077 project interconnects in the American Electric Power (AEP) transmission system with a capacity of 124.7 MW. This Study has been requested to evaluate the modification of the GEN-2017-077 project to change the configuration to 32 x Sungrow SG4400 solar inverters operating at 3.985 MW for a total assumed dispatch of 127.52 MW. The inverters are rated at 4.4 MVA, thus the generating capability exceeds its Generator Interconnection Agreement (GIA) Interconnection Service amount. The injection amount must be limited to 124.7 MW at the POI as listed in Appendix A of the GIA. As a result, the customer must ensure that the amount of power injected at the POI does not exceed the Interconnection Service amount listed in its GIA. The requested modification includes the use of a Power Plant Controller (PPC) to limit the total power injected into the POI.

In addition, the modification request included changes to the collection system, generator step-up transformers, main substation transformer, auxiliary load, reactive power devices, and generation interconnection line. The previously accepted and modified configurations for GEN-2017-077 are shown in Table ES-1 below.

Table ES-1: GEN-2017-077 Modification Request

Facility	Existing Configuration	Modification Configuration
Point of Interconnection	Cooyyah 138 kV (EXCLART4 - 510401)	Cooyyah 138 kV (EXCLART4 - 510401)
Configuration/Capacity	43 x Power Electronics FS3000 operating at 2.9 MW (solar) = 72.5 MW	32 x Sungrow SG4400 operating at 3.985 MW (solar) = 127.52 MW [dispatch] Units are rated at 4.4 MVA, PPC in place to limit POI to 124.7 MW
	Length = 1.5 miles	Length = 1.8 miles
0 " 1.	R = 0.001440 pu	R = 0.001130 pu
Generation Interconnection Line	X = 0.005390 pu	X = 0.006100 pu
	B = 0.001710 pu Rating MVA = 0 MVA	B = 0.002380 pu Rating MVA = 217 MVA
Main Substation Transformer ¹	X = 8.997%, R = 0.225%, Winding MVA = 84 MVA, Rating MVA = 140 MVA	X12 = 9.777% R12 = 0.244%, X23 = 3.91% R23 = 0.098%, X13 = 13.686% R13 = 0.342%, Winding MVA = 108 MVA, Winding 1, 2, & 3 Rating MVA = 180 MVA
	Gen 1 Equivalent Qty: 43	Gen 1 Equivalent Qty: 32
Equivalent GSU Transformer ¹	X = 5.722%, R = 0.572%, Winding MVA = 129 MVA, Rating MVA = 150.5 MVA	X = 7.96%, R = 0.796%, Winding MVA = 140.8 MVA, Rating MVA = 140.8 MVA
	R = 0.002160 pu	R = 0.004180 pu
Equivalent Collector Line ²	X = 0.002200 pu	X = 0.002680 pu
	B = 0.011430 pu	B = 0.010270 pu
Auxiliary Load	N/A	0.78 MW + 0.256 MVAr on 34.5 kV Bus
Generator Dynamic Model ³ & Power Factor	43 x Power Electronics FS3000 3.2 MVA (REGCAU1) ³ Leading: 0.99 Lagging: 0.99	32 x Sungrow SG4400 4.4 MVA (REGCA1) ³ Leading: 0.9057 Lagging: 0.9057
Reactive Power Devices	N/A	1 x 16.5 MVAR 34.5 kV Capacitor Bank

¹⁾ X and R based on Winding MVA, 2) All pu are on 100 MVA Base 3) DYR stability model name



SPP determined that steady-state analysis was not required because the modifications to the project were not significant enough to change the previously studied steady-state conclusions. However, SPP determined that the change in manufacturer from Power Electronics to Sungrow required short circuit and dynamic stability analyses

The scope of this study included reactive power analysis, short circuit analysis, and dynamic stability analysis.

Aneden performed the analyses using the modification request data and the DISIS-2021-001 stability study models:

- 2025 Summer Peak (25SP),
- 2025 Winter Peak (25WP)

Aneden reviewed Generation Interconnection Requests (GIRs) that shared the same POI, Cooyyah 138 kV, and updated their models as applicable based on SPP's confirmation of the latest project configurations. The modification under study, GEN-2017-077, is the Existing Generating Facility (EGF) for the GEN-2023-SR22 Surplus Generating Facility (SGF) project. As a result, Aneden included the accepted GEN-2023-SR22 surplus project in the base models and created two stability scenarios to accommodate the status of GEN-2023-SR22. All analyses were performed using the Siemens PTI PSS/E¹ version 34 software and the results are summarized below.

The results of the reactive power analysis using the 25SP model showed that the GEN-2017-077 project needed a 1.4 MVAr shunt reactor on the 34.5 kV bus of the project substation with the modifications in place, an increase from the 1.2 MVAr found in the DISIS-2017-001-2 study². This is necessary to offset the capacitive effect on the transmission network caused by the project's transmission line and collector system during reduced generation conditions. The information gathered from the reactive power analysis is provided as information to the Interconnection Customer and Transmission Owner (TO) and/or Transmission Operator (TOP). The applicable reactive power requirements will be further reviewed by the TO and/or TOP.

The short circuit analysis was performed using the 25SP stability model modified for short circuit analysis. The results from the short circuit analysis with the updated topology showed that the maximum GEN-2017-077 contribution to three-phase fault currents in the immediate transmission systems at or near the GEN-2017-077 POI was 0.68 kA. The maximum three-phase fault current level within 5 buses of the POI was 35.9 kA for the 25SP model.

The dynamic stability analysis was performed using Siemens PTI PSS/E version 34.8.1 software for the two modified study models: 25SP and 25WP, each with two dispatch scenarios to ensure all reliability conditions were studied. 20 fault events were simulated, which included three-phase faults and single-line-to-ground stuck breaker faults.

• Scenario 1: GEN-2017-077 at maximum assumed dispatch, 127.52 MW, and the corresponding SGF, GEN-2023-SR22, disconnected.

² DISIS-2017-001-2 Restudy of Stability and Short Circuit Analysis – June 16, 2022



¹ Power System Simulator for Engineering

• Scenario 2: the second scenario dispatch has both the EGF and SGF online using the selected Scenario 2 dispatch from the GEN-2023-SR22 report³. As a result, the EGF is dispatched to 114.7 MW and the SGF to 10 MW for a total combination of 124.7 MW

The results of the dynamic stability analysis showed several existing base case issues that were found in both the original DISIS-2021-001 models (without GEN-2023-SR22) and in the models with the GEN-2017-077 modification (and GEN-2023-SR22) included. These issues were not attributed to the GEN-2017-077 modification request and are detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2017-077 modification request observed during the simulated faults. Additionally, the project was found to stay connected during the contingencies that were studied and, therefore, will meet the Low Voltage Ride Through (LVRT) requirements of FERC Order #661A.

Based on the results of the study, SPP determined that the requested modification is **not a Material Modification**. The requested modification does not have a material adverse impact on the cost or timing of any other Interconnection Request with a later Queue priority date. As the requested modification places the generating capacity of the Interconnection Request at a higher amount than its Interconnection Service, the customer must install monitoring and control equipment as needed to ensure that the amount of power injected at the POI does not exceed the Interconnection Service amount listed in its GIA.

In accordance with FERC Order No. 827, the generating facility will be required to provide dynamic reactive power within the range of 0.95 leading to 0.95 lagging at the high-side of the generator substation.

It is likely that the customer may be required to reduce its generation output to 0 MW in real-time, also known as curtailment, under certain system conditions to allow system operators to maintain the reliability of the transmission network.

Nothing in this study should be construed as a guarantee of transmission service or delivery rights. If the customer wishes to obtain deliverability to final customers, a separate request for transmission service must be requested on Southwest Power Pool's OASIS by the customer.

³ GEN-2023-SR22 Surplus Service Impact Study - January 18, 2024



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1.0 Scope of Study

Aneden Consulting (Aneden) was retained by the Southwest Power Pool (SPP) to perform a Modification Request Impact Study (Study) for the GEN-2017-077 project. A Modification Request Impact Study is a generation interconnection study performed to evaluate the impacts of modifying the DISIS study assumptions. The determination of the required scope of the study is dependent upon the specific modification requested and how it may impact the results of the DISIS study. Impacting the DISIS results could potentially affect the cost or timing of any Interconnection Request with a later Queue priority date, deeming the requested modification a Material Modification. The criteria sections below include reasoning as to why an analysis was either included or excluded from the scope of study.

All analyses were performed using the Siemens PTI PSS/E version 34 software. The results of each analysis are presented in the following sections.

1.1 Reactive Power Analysis

SPP requires that a reactive power analysis be performed on the requested configuration if it is a non-synchronous resource. The reactive power analysis determines the capacitive effect at the POI caused by the project's collection system and transmission line's capacitance. A shunt reactor size was determined to offset the capacitive effect and maintain zero (0) MVAr injection at the POI while the plant's generators and capacitors were offline.

1.2 Short Circuit Analysis & Stability Analysis

To determine whether stability and short circuit analyses are required, SPP evaluates the difference between the stability models, the stability model parameters and, if needed, the equivalent collector system impedance between the existing configuration and the requested modification. Dynamic stability analysis and short circuit analysis would be required if the differences listed above were determined to have a significant impact on the most recently performed DISIS stability analysis. Dynamic stability analysis was performed on two dispatch scenarios, the first where GEN-2017-077 was online at 100% of the assumed dispatch with GEN-2023-SR22 offline and disconnected, and the second, where both the EGF and SGF are online using the selected Scenario 2 dispatch from the GEN-2023-SR22 report⁴.

1.3 Steady-State Analysis

Steady-state analysis is performed if SPP deems it necessary based on the nature of the requested change. SPP determined that steady-state analysis was not required because the modifications to the project were not significant enough to change the previously studied steady-state conclusions.

1.4 Study Limitations

The assessments and conclusions provided in this report are based on assumptions and information provided to Aneden by others. While the assumptions and information provided may be appropriate for the purposes of this report, Aneden does not guarantee that those conditions assumed will occur. In addition, Aneden did not independently verify the accuracy or completeness of the information provided. As such, the conclusions and results presented in this report may vary depending on the extent to which actual future conditions differ from the assumptions made or information used herein.

⁴ GEN-2023-SR22 Surplus Service Impact Study - January 18, 2024



Southwest Power Pool

2.0 Project and Modification Request

The GEN-2017-077 Interconnection Customer requested a modification to its Generation Interconnection Request (GIR) with a Point of Interconnection (POI) at the Cooyyah 138 kV Substation (EXCLART4 in the DISIS-2021-001 models) in the American Electric Power (AEP) transmission system.

At the time of report posting, the GEN-2017-077 project is an active Interconnection Request with a queue status of "IA FULLY EXECUTED/ON SCHEDULE." GEN-2017-077 is a solar facility with a maximum summer and winter queue capacity of 124.7 MW with Energy Resource Interconnection Service (ERIS). The GEN-2017-077 project is currently in the DISIS-2017-001 cluster.

Aneden reviewed Generation Interconnection Requests (GIRs) that shared the same POI, Cooyyah 138 kV, and updated their models as applicable based on SPP's confirmation of the latest project configurations. The modification under study, GEN-2017-077, is the Existing Generating Facility (EGF) for the GEN-2023-SR22 Surplus Generating Facility (SGF) project. As a result, Aneden included the accepted GEN-2023-SR22 surplus project in the base models and created two stability scenarios to accommodate the status of GEN-2023-SR22.

Figure 2-1 shows the power flow model single line diagram for the previously accepted GEN-2017-077 configuration modeled in the DISIS-2021-001 25SP stability model with the GEN-2023-SR22 surplus project included.

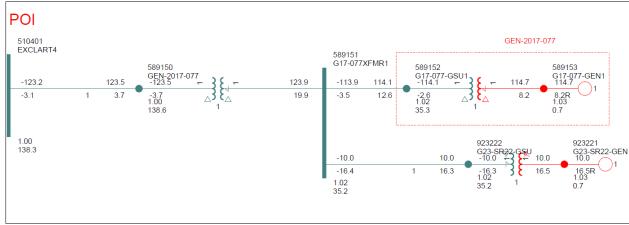


Figure 2-1: GEN-2017-077 Single Line Diagram (Previous Configuration*)

*based on the previously accepted configuration with the GEN-2023-SR22 surplus project included

This Study has been requested to evaluate the modification of GEN-2017-077 to change the configuration to 32 x Sungrow SG4400 solar inverters operating at 3.985 MW for a total assumed dispatch of 127.52 MW. The inverters are rated at 4.4 MVA, thus the generating capability exceeds its Generator Interconnection Agreement (GIA) Interconnection Service amount. The injection amount must be limited to 124.7 MW at the POI as listed in Appendix A of the GIA. As a result, the customer must ensure that the amount of power injected at the POI does not exceed the Interconnection Service amount listed in its GIA. The requested modification includes the use of a Power Plant Controller (PPC) to limit the total power injected into the POI.

In addition, the modification request included changes to the collection system, generator step-up transformers, main substation transformer, auxiliary load, reactive power devices, and generation interconnection line. Figure 2-2 shows the power flow model single line diagram for the GEN-2017-077



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modification with the GEN-2023-SR22 surplus project included. The previously accepted and modified configurations for GEN-2017-077 are shown in Table 2-1 below.

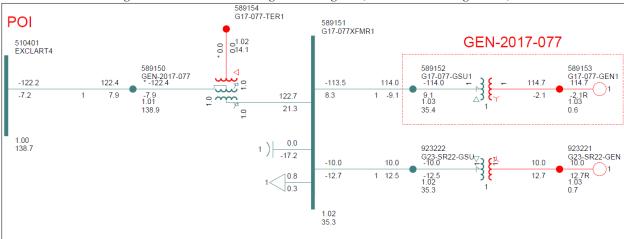


Figure 2-2: GEN-2017-077 Single Line Diagram (Modification Configuration)



Table 2-1: GEN-2017-077 Modification Request

Table 2-1: GEN-2017-07/ Modification Request				
Facility	Existing Configuration	Modification Configuration		
Point of Interconnection	Cooyyah 138 kV (EXCLART4 - 510401)	Cooyyah 138 kV (EXCLART4 - 510401)		
Configuration/Capacity	43 x Power Electronics FS3000 operating at 2.9 MW (solar) = 72.5 MW	32 x Sungrow SG4400 operating at 3.985 MW (solar) = 127.52 MW [dispatch] Units are rated at 4.4 MVA, PPC in place to limit POI to 124.7 MW		
	Length = 1.5 miles	Length = 1.8 miles		
	R = 0.001440 pu	R = 0.001130 pu		
Generation Interconnection Line	X = 0.005390 pu	X = 0.006100 pu		
Line	B = 0.001710 pu	B = 0.002380 pu		
	Rating MVA = 0 MVA	Rating MVA = 217 MVA		
Main Substation Transformer ¹	X = 8.997%, R = 0.225%, Winding MVA = 84 MVA, Rating MVA = 140 MVA	X12 = 9.777% R12 = 0.244%, X23 = 3.91% R23 = 0.098%, X13 = 13.686% R13 = 0.342%, Winding MVA = 108 MVA, Winding 1, 2, & 3 Rating MVA = 180 MVA		
Equivalent GSU Transformer ¹	Gen 1 Equivalent Qty: 43 X = 5.722%, R = 0.572%, Winding MVA = 129 MVA, Rating MVA = 150.5 MVA	Gen 1 Equivalent Qty: 32 X = 7.96%, R = 0.796%, Winding MVA = 140.8 MVA, Rating MVA = 140.8 MVA		
	R = 0.002160 pu	R = 0.004180 pu		
Equivalent Collector Line ²	X = 0.002200 pu	X = 0.002680 pu		
	B = 0.011430 pu	B = 0.010270 pu		
Auxiliary Load	N/A	0.78 MW + 0.256 MVAr on 34.5 kV Bus		
Generator Dynamic Model ³ & Power Factor	43 x Power Electronics FS3000 3.2 MVA (REGCAU1) ³ Leading: 0.99 Lagging: 0.99	32 x Sungrow SG4400 4.4 MVA (REGCA1) ³ Leading: 0.9057 Lagging: 0.9057		
Reactive Power Devices	N/A	1 x 16.5 MVAR 34.5 kV Capacitor Bank		

¹⁾ X and R based on Winding MVA, 2) All pu are on 100 MVA Base 3) DYR stability model name



3.0 Existing vs Modification Comparison

To determine which analyses are required for the Study, the differences between the previously accepted configuration and the requested modification were evaluated. Aneden performed this comparison and the resulting analyses using a set of modified study models developed based on the modification request data and the DISIS-2021-001 stability study models. The analysis was completed using PSS/E version 34 software.

The methodology and results of the comparisons are described below.

3.1 Stability Model Parameters Comparison

SPP determined that short circuit and dynamic stability analyses were required because of the inverter change from Power Electronics to Sungrow inverters. This is because the short circuit contribution and stability responses of the existing configuration and the requested modification's configuration may differ. The generator dynamic model for the modification can be found in Appendix A.

As short circuit and dynamic stability analyses were already deemed required, a stability model parameters comparison was not needed for the determination of the scope of the study.

3.2 Equivalent Impedance Comparison Calculation

As the inverter manufacturer change determined that short circuit and dynamic stability analyses were required, an equivalent impedance comparison was not needed for the determination of the scope of the study.



4.0 Reactive Power Analysis

The reactive power analysis was performed for GEN-2017-077 to determine the capacitive charging effects during reduced generation conditions (unsuitable wind speeds, unsuitable solar irradiance, insufficient state of charge, idle conditions, curtailment, etc.) at the generation site and to size shunt reactors that would reduce the project reactive power contribution to the POI to approximately zero.

4.1 Methodology and Criteria

To determine the shunt reactor size required to compensate for the current charging attributed to the modification request, the shunt size required from the GEN-2023-SR22 surplus study was placed first. Once the shunt size for the SGF was placed, the GEN-2017-077 incremental shunt reactor size was then calculated.

For each of the shunt reactor sizes calculated, all project generators, capacitors and auxiliary/station service loads were switched offline while other collector system elements remained in-service. A shunt reactor was tested at the project's collection substation 34.5 kV bus to set the MVAr injection at the POI to zero.

The size of the shunt reactor is equivalent to the charging current value at unity voltage and the compensation provided is proportional to the voltage effects on the charging current (i.e., for voltages above unity, reactive compensation is greater than the size of the reactor).

Aneden performed the reactive power analysis using the modification request data based on the 25SP DISIS-2021-001 stability study model.

4.2 Results

The results from the analysis showed that the GEN-2017-077 project needed approximately 1.4 MVAr of compensation at its collector substation to reduce the MVAr injection at the POI to zero with the SGF reactor in place. GEN-2023-SR22 did not require reactive compensation per the surplus study report⁵, so a reactor was not placed for the SGF. This is an increase from the 1.2 MVAr found in the DISIS-2017-001-2 study⁶. The final shunt reactor requirements are shown in Table 4-1. Figure 4-1 illustrates the shunt reactor size needed to reduce the POI MVAr to approximately zero with the updated topology.

The information gathered from the reactive power analysis is provided as information to the Interconnection Customer and Transmission Owner (TO) and/or Transmission Operator (TOP). The applicable reactive power requirements will be further reviewed by the TO and/or TOP.

Table 4-1: Shunt Reactor Size for Reactive Power Analysis

Machine	POI Bus	DOI Buo Nama	Reactor Size (MVAr)	
Machine	Number	POI Bus Name	25SP	
GEN-2017-077	510401	EXCLART4	1.4	

⁶ DISIS-2017-001-2 Restudy of Stability and Short Circuit Analysis – June 16, 2022



⁵ GEN-2023-SR22 Surplus Service Impact Study - January 18, 2024

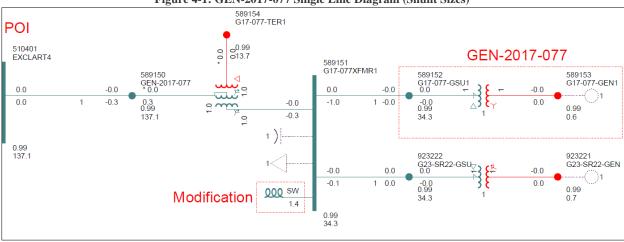


Figure 4-1: GEN-2017-077 Single Line Diagram (Shunt Sizes)



5.0 Short Circuit Analysis

Aneden performed a short circuit study using the 25SP model for GEN-2017-077 to determine the maximum fault current requiring interruption by protective equipment for each bus in the relevant subsystem. The detailed results of the short circuit analysis are provided in Appendix B.

5.1 Methodology

The short circuit analysis included applying a 3-phase fault on buses up to 5 levels away from the 138 kV POI bus. The PSS/E "Automatic Sequence Fault Calculation (ASCC)" fault analysis module was used to calculate the fault current levels in the transmission system with and without GEN-2017-077 online. The existing SGF, GEN-2023-SR22, was left online for this analysis.

Aneden created a short circuit model using the 25SP DISIS-2021-001 stability study model by adjusting the GEN-2017-077 short circuit parameters consistent with the submitted data. The adjusted parameters used in the short circuit analysis are shown in Table 5-1 below. No other changes were made to the model.

Table 5-1: Short Circuit Model Parameters*

Parameter	Value by Generator Bus#	
	589153	
Machine MVA Base	140.8	
R (pu)	0.0	
X" (pu)	0.642	

^{*}pu values based on Machine MVA Base

5.2 Results

The results of the short circuit analysis compared the 25SP model with GEN-2023-SR22 online and the GEN-2017-077 modification not connected to the stability Scenario 2 dispatch model with both the existing SGF and GEN-2017-077 in service as described in Section 6.1. The GEN-2017-077 POI bus (Cooyyah 138 kV) fault current magnitudes for the comparison cases are provided in Table 5-2 showing a fault current of 7.46 kA with the GEN-2017-077 project online.

Table 5-3 shows the maximum fault current magnitudes and fault current increases with the GEN-2017-077 project online. The maximum fault current calculated within 5 buses of the POI was 35.9 kA for the 25SP model. The maximum GEN-2017-077 contribution to three-phase fault currents was about 10% and 0.68 kA.

Table 5-2: POI Short Circuit Comparison Results

Case	GEN-OFF Current (kA)	GEN-ON Current (kA)	kA Change	%Change
25SP	6.78	7.46	0.68	10.0%



Table 5-3: 25SP Short Circuit Comparison Results

Voltage (kV)	Max. Current (kA)	Max kA Change	Max %Change
69	11.3	0.16	1.4%
115	9.4	0.15	1.6%
138	35.9	0.68	10.0%
161	23.8	0.07	0.3%
Max	35.9	0.68	10.0%



6.0 Dynamic Stability Analysis

Aneden performed a dynamic stability analysis to identify the impact of the modifications to GEN-2017-077. The analysis was performed according to SPP's Disturbance Performance Requirements⁷. The modification details are described in Section 2.0 above and the dynamic modeling data is provided in Appendix A. The existing base case issues and simulation plots can be found in Appendix C.

6.1 Methodology and Criteria

The dynamic stability analysis was performed using models developed with the requested GEN-2017-077 configuration of 32 x Sungrow SG4400 inverters operating at 3.985 MW (REGCA1). This stability analysis was performed using Siemens PTI's PSS/E version 34.8.1 software.

The modifications requested for the GEN-2017-077 project were used to create modified stability models for this impact study based on the DISIS-2021-001 stability study models:

- 2025 Summer Peak (25SP),
- 2025 Winter Peak (25WP)

Aneden reviewed GIRs that shared the same POI, Cooyyah 138 kV, and updated their models as applicable based on SPP's confirmation of the latest project configurations. The modification under study, GEN-2017-077, is the EGF for the GEN-2023-SR22 SGF project. As a result, Aneden included the accepted GEN-2023-SR22 surplus project in the base models and created two stability scenarios to accommodate the status of GEN-2023-SR22.

Two stability model scenarios were developed using these models to ensure all reliability conditions were studied. The first scenario (Scenario 1) was comprised of GEN-2017-077 online at 100% of the assumed dispatch (127.52 MW) while the GEN-2023-SR22 generator was offline and disconnected.

The EGF/SGF dispatch combination for the second scenario (Scenario 2) was taken from the GEN-2023-SR22 report⁸. The Scenario 2 studied in the surplus study was used for this analysis as well. The study scenarios are shown in Table 6-1.

Table 6-1: Study Scenarios (Generator Dispatch MW)

Scenario	GEN-2017-077 EGF (MW)	GEN-2023-SR22 SGF (MW)	EGF + SGF (MW)
1	127.52	0 (Offline)	127.52
2	114.7	10	124.7

The dynamic model data for the GEN-2017-077 project is provided in Appendix A. The power flow models and associated dynamic database were initialized (no-fault test) to confirm that there were no errors in the initial conditions of the system and the dynamic data.

⁸ GEN-2023-SR22 Surplus Service Impact Study - January 18, 2024



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⁷ SPP Disturbance Performance Requirements:

https://www.spp.org/documents/28859/spp%20 disturbance%20 performance%20 requirements%20 (twg%20 approved).pdf

The following system adjustments were made to address existing base case issues that are not attributed to the modification request:

• The PSSE dynamic simulation iterations and acceleration factor were adjusted as needed to resolve PSSE dynamic simulation crashes.

During the fault simulations, the active power (PELEC), reactive power (QELEC), and terminal voltage (ETERM) were monitored for GEN-2017-077 and other current and prior queued projects in Group 4. In addition, voltages of five (5) buses away from the POI of the GEN-2017-077 were monitored and plotted. The machine rotor angle for synchronous machines and speed for asynchronous machines within the study areas including 327 (EES-EAI), 330 (AECI), 351 (EES), 356 (AMMO), 502 (CLEC), 515 (SWPA), 520 (AEPW), 523 (GRDA), 524 (OKGE), 525 (WFEC), 526 (SPS), 527 (OMPA), 534 (SUNC), 536 (WERE), 544 (EMDE), and 546 (SPRM) were monitored. The voltages of all 100 kV and above buses within the study area were monitored as well.

6.2 Fault Definitions

Aneden developed fault events as required to study the modification. The new set of faults was simulated using the modified study models. The fault events included three-phase faults and single-line-to-ground stuck breaker faults. Single-line-to-ground faults are approximated by applying a fault impedance to bring the faulted bus positive sequence voltage to 0.6 pu. The simulated faults are listed and described in Table 6-2 below. These contingencies were applied to the modified 25SP and 25WP models.

Table 6-2: Fault Definitions

Fault ID	Planning Event	Event Description
FLT1000-SB	P4	Stuck Breaker on EXCLART4 (510401) 138 kV Bus a. Apply single phase fault at the EXCLART4 (510401) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the EXCLART4 (510401) 138 kV to EXPCLAR4 (510405) 138 kV line CKT 1. b.2.Trip the EXCLART4 (510401) 138 kV to PRY_CRK4 (510431) 138 kV line CKT 1.
FLT1001-SB	P4	Stuck Breaker on EXCLART4 (510401) 138 kV Bus a. Apply single phase fault at the EXCLART4 (510401) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the EXCLART4 (510401) 138 kV to EXPCLAR4 (510405) 138 kV line CKT 1. b.2.Trip the EXCLART4 (510401) 138 kV to CHOUTEA4 (510373) 138 kV line CKT 1.
FLT1002-SB	P4	Stuck Breaker on EXCLART4 (510401) 138 kV Bus a. Apply single phase fault at the EXCLART4 (510401) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the EXCLART4 (510401) 138 kV to CHOUTEA4 (510373) 138 kV line CKT 1. b.2.Trip the EXCLART4 (510401) 138 kV to GEN-2017-077 (589150) 138 kV line CKT 1. Trip generator(s) on the Bus G17-077-GEN1 (589153) 0.6 kV Trip generator(s) on the Bus G23-SR22-GEN (923221) 0.7 kV
FLT1003-SB	P4	Stuck Breaker on EXCLART4 (510401) 138 kV Bus a. Apply single phase fault at the EXCLART4 (510401) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the EXCLART4 (510401) 138 kV to GEN-2017-077 (589150) 138 kV line CKT 1. b.2.Trip the EXCLART4 (510401) 138 kV to PRY_CRK4 (510431) 138 kV line CKT 1. Trip generator(s) on the Bus G17-077-GEN1 (589153) 0.6 kV Trip generator(s) on the Bus G23-SR22-GEN (923221) 0.7 kV
FLT1004-SB	P4	Stuck Breaker on PRY_CRK4 (510431) 138 kV Bus a. Apply single phase fault at the PRY_CRK4 (510431) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the PRY_CRK4 (510431) 138 kV to MCARBDE4 (510366) 138 kV line CKT 1. b.2.Trip the MCARBDE4 (510366) 138 kV to G20-092-TAP (764160) 138 kV line CKT 1. b.3.Trip the PRY_CRK4 (510431) 138 kV to EXCLART4 (510401) 138 kV line CKT 1.



Table 6-2 Continued

Fault ID	Planning	Figure 6-2 Continued Event Description
FLT1005-SB	Event P4	Stuck Breaker on ROCKPT-4 (510437) 138 kV Bus a. Apply single phase fault at the ROCKPT-4 (510437) 138 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the ROCKPT-4 (510437) 138 kV to CHOUTEA4 (510373) 138 kV line CKT 1. b.2.Trip the CHOUTEA4 (510373) 138 kV to EXCLART4 (510401) 138 kV line CKT 1. b.3.Trip the ROCKPT-4 (510437) 138 kV to INOLATP4 (509752) 138 kV line CKT 1.
FLT9000-3PH	P1	3 Phase fault on EXCLART4 (510401) 138 kV to GEN-2017-077 (589150) 138 kV line CKT 1, near EXCLART4 (510401) 138 kV. a. Apply fault at the EXCLART4 (510401) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. Trip generator(s) on the Bus G17-077-GEN1 (589153) 0.6 kV Trip generator(s) on the Bus G23-SR22-GEN (923221) 0.7 kV c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9001-3PH	P1	3 Phase fault on EXCLART4 (510401) 138 kV to PRY_CRK4 (510431) 138 kV line CKT 1, near EXCLART4 (510401) 138 kV. a. Apply fault at the EXCLART4 (510401) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9002-3PH	P1	3 Phase fault on PRY_CRK4 (510431) 138 kV to EXCLART4 (510401) 138 kV line CKT 1, near PRY_CRK4 (510431) 138 kV. a. Apply fault at the PRY_CRK4 (510431) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9003-3PH	P1	3 Phase fault on PRY_CRK4 (510431) 138 kV to MCARBDE4 (510366) 138 kV line CKT 1, near PRY_CRK4 (510431) 138 kV. a. Apply fault at the PRY_CRK4 (510431) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9004-3PH	P1	3 Phase fault on G20-092-TAP (764160) 138 kV to MCARBDE4 (510366) 138 kV line CKT 1, near G20-092-TAP (764160) 138 kV. a. Apply fault at the G20-092-TAP (764160) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9005-3PH	P1	3 Phase fault on G20-092-TAP (764160) 138 kV to GEN-2020-092 (764150) 138 kV line CKT 1, near G20-092-TAP (764160) 138 kV. a. Apply fault at the G20-092-TAP (764160) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. Trip generator(s) on the Bus G20-092-GEN1 (764151) 0.7 kV c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9006-3PH	P1	3 Phase fault on G20-092-TAP (764160) 138 kV to PRY-JCT4 (510419) 138 kV line CKT 1, near G20-092-TAP (764160) 138 kV. a. Apply fault at the G20-092-TAP (764160) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9007-3PH	P1	3 Phase fault on EXCLART4 (510401) 138 kV to CHOUTEA4 (510373) 138 kV line CKT 1, near EXCLART4 (510401) 138 kV. a. Apply fault at the EXCLART4 (510401) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9008-3PH	P1	3 Phase fault on ROCKPT-4 (510437) 138 kV to CHOUTEA4 (510373) 138 kV line CKT 1, near ROCKPT-4 (510437) 138 kV. a. Apply fault at the ROCKPT-4 (510437) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.



Table 6-2 Continued

Fault ID	Planning Event	Event Description
FLT9009-3PH	P1	3 Phase fault on ROCKPT-4 (510437) 138 kV to INOLATP4 (509752) 138 kV line CKT 1, near ROCKPT-4 (510437) 138 kV. a. Apply fault at the ROCKPT-4 (510437) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9010-3PH	P1	3 Phase fault on INOLATP4 (509752) 138 kV to ROCKPT-4 (510437) 138 kV line CKT 1, near INOLATP4 (509752) 138 kV. a. Apply fault at the INOLATP4 (509752) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9011-3PH	P1	3 Phase fault on INOLATP4 (509752) 138 kV to CATOOSA4 (509790) 138 kV line CKT 1, near INOLATP4 (509752) 138 kV. a. Apply fault at the INOLATP4 (509752) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9012-3PH	P1	3 Phase fault on INOLATP4 (509752) 138 kV to INOLA 4 (509736) 138 kV line CKT 1, near INOLATP4 (509752) 138 kV. a. Apply fault at the INOLATP4 (509752) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.
FLT9013-3PH	P1	3 Phase fault on EXCLART4 (510401) 138 kV to EXPCLAR4 (510405) 138 kV line CKT 1, near EXCLART4 (510401) 138 kV. a. Apply fault at the EXCLART4 (510401) 138 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. c. Wait 20 cycles, and then re-close the line in (b) back into the fault. d. Leave Fault on for 7 cycles, then trip the line in (b) and remove fault.

6.3 Scenario 1 Results

Table 6-3 shows the relevant results of the fault events simulated for each of the modified models in Scenario 1. Existing DISIS base case issues are documented separately in Appendix C. The associated stability plots are also provided in Appendix C.

Table 6-3: Scenario 1 Dynamic Stability Results (GEN-2017-077 = 127.52, GEN-2023-SR22 = 0)

		25SP		25WP			
Fault ID	Voltage Violation	Voltage Recovery	Stable	Voltage Violation	Voltage Recovery	Stable	
FLT1000-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT1001-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT1002-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT1003-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT1004-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT1005-SB	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9000-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9001-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9002-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9003-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9004-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9005-3PH	Pass	Pass	Stable	Pass	Pass	Stable	



Table 6-3 Continued

		25SP		25WP			
Fault ID	Voltage Violation	Voltage Recovery	Stable	Voltage Violation	Voltage Recovery	Stable	
FLT9006-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9007-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9008-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9009-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9010-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9011-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9012-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9013-3PH	Pass	Pass	Stable	Pass	Pass	Stable	

The results of the Scenario 1 dynamic stability showed several existing base case issues that were found in both the original DISIS-2021-001 models (without GEN-2023-SR22) and in the models with the GEN-2017-077 modification (and GEN-2023-SR22) included. These issues were not attributed to the GEN-2017-077 modification request and detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2017-077 modification request observed during the simulated faults. Additionally, the project was found to stay connected during the contingencies that were studied and, therefore, will meet the Low Voltage Ride Through (LVRT) requirements of FERC Order #661A.

6.4 Scenario 2 Results

Table 6-4 shows the relevant results of the fault events simulated for each of the modified models in Scenario 2. Existing DISIS base case issues are documented separately in Appendix C. The associated stability plots are also provided in Appendix C.

Table 6-4: Scenario 2 Dynamic Stability Results (GEN-2017-077 = 114.7, GEN-2023-SR22 = 10)

		25SP		25WP		
Fault ID	Voltage Violation	Voltage Recovery	Stable	Voltage Violation	Voltage Recovery	Stable
FLT1000-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT1001-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT1002-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT1003-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT1004-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT1005-SB	Pass	Pass	Stable	Pass	Pass	Stable
FLT9000-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9001-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9002-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9003-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9004-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9005-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9006-3PH	Pass	Pass	Stable	Pass	Pass	Stable



Table 6-4 Continued

1 Continued							
Fault ID		25SP		25WP			
	Voltage Violation	Voltage Recovery	Stable	Voltage Violation	Voltage Recovery	Stable	
FLT9007-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9008-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9009-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9010-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9011-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9012-3PH	Pass	Pass	Stable	Pass	Pass	Stable	
FLT9013-3PH	Pass	Pass	Stable	Pass	Pass	Stable	

The results of the Scenario 2 dynamic stability showed several existing base case issues that were found in both the original DISIS-2021-001 models (without GEN-2023-SR22) and in the models with the GEN-2017-077 modification (and GEN-2023-SR22) included. These issues were not attributed to the GEN-2017-077 modification request and detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2017-077 modification request observed during the simulated faults. Additionally, the project was found to stay connected during the contingencies that were studied and, therefore, will meet the Low Voltage Ride Through (LVRT) requirements of FERC Order #661A.



7.0 Modified Capacity Exceeds GIA Capacity

Under FERC Order 845, Interconnection Customers are allowed to request Interconnection Service that is lower than the full generating capacity of their planned generating facilities. The Interconnection Customers must install acceptable control and protection devices that prevent the injection above their requested Interconnection Service amount measured at the POI.

As such, Interconnection Customers are allowed to increase the generating capacity of a generating facility without increasing its Interconnection Service amount stated in its GIA. This is allowable as long as they install the proper control and protection devices, and the requested modification is not determined to be a Material Modification.

The modified generating capacity of GEN-2017-077 exceeds the GIA Interconnection Service amount, 124.7 MW, as listed in Appendix A of the GIA.

The customer must install monitoring and control equipment as needed to ensure that the amount of power injected at the POI does not exceed the Interconnection Service amount listed in its GIA.



8.0 Material Modification Determination

In accordance with Attachment V of SPP's Open Access Transmission Tariff, for modifications other than those specifically permitted by Attachment V, SPP shall evaluate the proposed modifications prior to making them and inform the Interconnection Customer in writing of whether the modifications would constitute a Material Modification. Material Modification shall mean (1) modification to an Interconnection Request in the queue that has a material adverse impact on the cost or timing of any other Interconnection Request with a later Queue priority date; or (2) planned modification to an Existing Generating Facility that is undergoing evaluation for a Generating Facility Modification or Generating Facility Replacement, and has a material adverse impact on the Transmission System with respect to: i) steady-state thermal or voltage limits, ii) dynamic system stability and response, or iii) short-circuit capability limit; compared to the impacts of the Existing Generating Facility prior to the modification or replacement.

8.1 Results

SPP determined the requested modification is not a Material Modification based on the results of this Modification Request Impact Study performed by Aneden. Aneden evaluated the impact of the requested modification on the prior study results. Aneden determined that the requested modification did not negatively impact the prior study dynamic stability and short circuit results, and the modifications to the project were not significant enough to change the previously studied steady-state conclusions.

This determination implies that any network upgrades already required by GEN-2017-077 would not be negatively impacted and that no new upgrades are required due to the requested modification, thus not resulting in a material adverse impact on the cost or timing of any other Interconnection Request with a later Queue priority date.

