



Report on

# GEN-2023-SR19 Sensitivity Surplus Interconnection Service Impact Study

**Revision R1      January 23, 2026**

Submitted to  
Southwest Power Pool



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## Revision History

DATE OR VERSION NUMBER	AUTHOR	CHANGE DESCRIPTION
1/23/2026	Aneiden Consulting	Initial Report Issued

## Executive Summary

Aneden Consulting (Aneden) was retained by Southwest Power Pool (SPP) to perform a Sensitivity Surplus Interconnection Service Impact Study (Study) for GEN-2023-SR19 to utilize the Surplus Interconnection Service being made available by the combined GEN-2011-018 & GEN-2013-008 & GEN-2014-004 project at its existing Point of Interconnection (POI), the STEELEC7 115 kV Substation in the Nebraska Public Power District (NPPD) transmission system.

GEN-2023-SR19, the proposed Surplus Generating Facility (SGF), will connect to the existing GEN-2011-018 & GEN-2013-008 & GEN-2014-004 main collection substation and share its main power transformer.

GEN-2011-018 & GEN-2013-008 & GEN-2014-004, the Existing Generating Facility (EGF), has an effective Generator Interconnection Agreement (GIA) with a combined POI capacity of 78.76 MW and is making 50 MW of Surplus Interconnection Service available at its POI. Per the SPP Open Access Transmission Tariff (SPP Tariff), the amount of Surplus Interconnection Service available to the SGF is limited by the amount of Interconnection Service granted to the EGF at the same POI. In addition, the Surplus Interconnection Service is only available up to the amount that can be accommodated without requiring Network Upgrades except those specified in the SPP Tariff<sup>1</sup>.

The proposed SGF configuration consists of 17 x GE FLEX 1571 Battery Energy Storage System (BESS) inverters operating at 2.972 MW for a total assumed dispatch of 50.524 MW. The inverters are rated at 4.4 MVA, thus the generating capability of the SGF (74.8 MW) exceeds its requested Surplus Interconnection Service of 50 MW. The injection amount of the SGF must be limited to 50 MW at the POI. The combined generation from both the SGF and the EGF may not exceed 78.76 MW at the POI. GEN-2023-SR19 includes the use of a Power Plant Controller (PPC) to limit the power injection as required. The SGF and EGF information is shown in Table ES-1 below.

**Table ES-1: EGF & SGF Configuration**

Request	Interconnection Queue Capacity (MW)	Generator Fuel Type	Point of Interconnection
GEN-2023-SR19 (SGF)	50	Battery Energy Storage System (BESS)	STEELEC7 115 kV (640426)
GEN-2011-018 & GEN-2013-008 & GEN-2014-004 (EGF)	78.76	Wind	STEELEC7 115 kV (640426)

<sup>1</sup> Allowed Network Upgrades detailed in SPP Open Access Transmission Tariff Attachment V Section 3.3

The detailed SGF configuration is captured in Table ES-2 below.

**Table ES-2: SGF Interconnection Configuration**

Facility	SGF Configuration
Point of Interconnection	STEELEC7 115 kV (640426)
Configuration/Capacity	17 x GE FLEX 1571 Inverters 2.972 MW (BESS) = 50.524 MW [dispatch] Units are rated at 4.4 MVA, PPC to limit GEN-2023-SR19 to 50 MW at the POI and total POI injection w/ GEN-2011-018 & GEN-2013-008 & GEN-2014-004 to 78.76 MW
Generation Interconnection Line (Shared with the EGF and unchanged from the Previous Modification <sup>1</sup> )	Length = 3.09 miles R = 0.0032 pu X = 0.165 pu B = 0.0024 pu Rating MVA = 149 MVA
Main Substation Transformer <sup>2</sup> (Shared with the EGF and unchanged from the Previous Modification <sup>1</sup> )	X12 = 8.0031% R12 = 0.2501%, X23 = 3.9988% R23 = 0.1%, X13 = 11.9963% R13 = 0.2999%, Winding MVA = 51 MVA, Winding 1, 2, & 3 Rating MVA = 85 MVA
Equivalent GSU Transformer <sup>2</sup>	Gen 1 Equivalent Qty: 17 X = 7.664%, R = 0.7441%, Winding MVA = 76.5 MVA, Rating MVA = 76.5 MVA
Equivalent Collector Line <sup>3</sup>	R = 0.002247 pu X = 0.004616 pu B = 0.008034 pu
Generator Dynamic Model <sup>4</sup> & Power Factor	17 x GE FLEX 1571 Inverters 4.4 MVA (REGCA1) <sup>4</sup> Leading: 0.675 Lagging: 0.675

1) EGF was modified in 2024, 2) X and R based on Winding MVA, 3) All pu are on 100 MVA Base, 4) DYR stability model name

SPP determined that steady-state analysis was not required because the addition of the SGF does not increase the maximum active power output of 78.76 MW. In addition, the EGF was previously studied at maximum Interconnection Service under all necessary reliability conditions.

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

Aneden performed the analyses using the study data provided for the SGF and the DISIS-2021-001 Phase 2 stability study models:

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

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Aneden reviewed Generation Interconnection Requests (GIRs) that shared the same POI, STEELEC7 115 kV, and updated their models as applicable based on SPP's confirmation of the latest project configurations. As a result, Aneden updated the EGF, GEN-2011-018 & GEN-2013-008 & GEN-2014-004, project configuration in the base models.

All analyses were performed using the Siemens PTI PSS/E<sup>2</sup> version 34 software and the results are summarized below.

The results of the reactive power analysis using the 25SP model showed that the SGF project needed a 0.8 MVar shunt reactor at the project substation to reduce the POI MVar to zero when the EGF project has a shunt compensating for its charging effects. 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 compared the 25SP model with the EGF online and SGF not connected to the SGF study model (EGF and SGF online). The maximum contribution to three-phase fault currents in the immediate transmission systems due to the addition of the SGF was not greater than 0.28 kA. The maximum three-phase fault current level within 5 buses of the POI with the EGF and SGF generators online was 43.7 kA for the 25SP model. There were several buses with a maximum three-phase fault current over 40 kA. These buses are highlighted in Appendix B.

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. 30 fault events were simulated, which included three-phase faults and single-line-to-ground stuck breaker faults.

- Scenario 1: SGF at maximum assumed dispatch, 50.524 MW, and EGF disconnected.
- Scenario 2: SGF at maximum assumed dispatch, 50.524 MW, and EGF dispatched with the remaining 28.236 MW for a total combination of 78.76 MW.

The results of the dynamic stability analysis showed several existing base case issues that were found in both the original DISIS-2021-001 Phase 2 models and in the models with GEN-2023-SR19 included. These issues were not attributed to the GEN-2023-SR19 surplus request and are detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2023-SR19 surplus 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.

The results of the study showed that the Surplus Interconnection Service Request by GEN-2023-SR19 did not negatively impact the reliability of the Transmission System. There were no additional Interconnection Facilities or Network Upgrades identified by the analyses.

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<sup>2</sup> Power System Simulator for Engineering

SPP has determined that GEN-2023-SR19 may utilize the requested 50 MW of Surplus Interconnection Service being made available by the EGF. The combined generation from both the SGF and the EGF may not exceed 78.76 MW at the POI.

The customer must install monitoring and control equipment as needed to ensure that the SGF does not exceed the granted surplus amount and to ensure that combination of the SGF and EGF power injected at the POI does not exceed the Interconnection Service amount listed in the EGF's GIA. The monitoring and control scheme may be reviewed by the TO and documented in Appendix C of the SGF GIA.

In accordance with FERC Order No. 827, both the SGF and EGF 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.

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## 1.0 Scope of Study

Aneden Consulting (Aneden) was retained by Southwest Power Pool (SPP) to perform a Sensitivity Surplus Service Impact Study (Study) for GEN-2023-SR19, the Surplus Generating Facility (SGF). A Surplus Service Impact Study is performed to identify the impact of the Surplus Interconnection Service on the transmission system reliability and any additional Interconnection Facilities necessary pursuant to the SPP Generator Interconnection Procedures (“GIP”) contained in Attachment V Section 3.3 of the SPP Open Access Transmission Tariff (SPP Tariff). The amount of Surplus Interconnection Service available to the SGF is limited by the amount of Interconnection Service granted to the existing interconnection customer for the Existing Generating Facility (EGF) at the same POI. The Surplus Interconnection Service is only available up to the amount that can be accommodated without requiring additional Network Upgrades except those specified in the SPP Tariff<sup>3</sup>. The required scope of the study is dependent upon the EGF and SGF specifications. The criteria sections below include the basis of the analyses included in 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 added capacitive effect at the POI caused by the project’s collection system and transmission line’s capacitance. A shunt reactor size was determined for the SGF to offset the capacitive effect and maintain zero (0) MVar injection at the POI while the plant’s generators and capacitors were offline, and the EGF project had a shunt compensating for its charging effects.

### 1.2 Short Circuit Analysis

SPP requires that a short circuit analysis be performed to determine the maximum available fault current requiring interruption by protective equipment with both the SGF and EGF online, along with the amount of increase in maximum fault current due to the addition of the SGF. The analysis was performed on two scenarios, with the EGF in service and SGF offline, and the modified model with both EGF and SGF in service.

### 1.3 Stability Analysis

SPP requires that a dynamic stability analysis be performed to determine whether the SGF, EGF, and the transmission system will remain stable and within applicable criteria. Dynamic stability analysis was performed on two dispatch scenarios, the first where the SGF was online at 100% of the assumed dispatch with the EGF offline and disconnected, and the second where the SGF was online at 100% of the assumed dispatch and the EGF was picking up the remaining EGF GIA capacity. The stability analyses will identify any additional Interconnection Facilities and Network Upgrades necessary.

### 1.4 Steady-State Analysis

The steady-state (thermal/voltage) analyses may be performed as necessary to ensure that all required reliability conditions are studied. If the EGF was not studied under off-peak conditions, off-peak steady state analyses shall be performed to the required level necessary to demonstrate reliable operation of the Surplus Interconnection Service. If the original system impact study is not available for the

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<sup>3</sup> Allowed Network Upgrades detailed in SPP Open Access Transmission Tariff Attachment V Section 3.3

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Interconnection Service, both off-peak and peak analysis may need to be performed for the EGF associated with the request.

An SGF that includes a fuel type (synchronous/non-synchronous) different from the EGF may require a steady-state analysis to study impacts resultant from changes in dispatch to all equal and lower queued requests. The steady-state analyses will identify any additional Interconnection Facilities and Network Upgrades necessary.

### **1.5 Necessary Interconnection Facilities & Network Upgrades**

The SPP Tariff<sup>4</sup> states that the reactive power, short circuit/fault duty, stability, and steady-state analyses (where applicable) for the Surplus Interconnection Service will identify any additional Interconnection Facilities necessary. In addition, the analyses will determine if any Network Upgrades are required for mitigation. The Surplus Interconnection Service is only available up to the amount that can be accommodated without requiring additional Network Upgrades unless (a) those additional Network Upgrades are either (1) located at the Point of Interconnection substation and at the same voltage level as the Generating Facility with an effective GIA, or (2) are System Protection Facilities; and (b) there are no material adverse impacts on the cost or timing of any Interconnection Requests pending at the time the Surplus Interconnection Service request is submitted.

### **1.6 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.

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<sup>4</sup> SPP Open Access Transmission Tariff Section 3.3.4.1



includes the use of a Power Plant Controller (PPC) to limit the power injection as required. The SGF and EGF information is shown in Table 2-1 below.

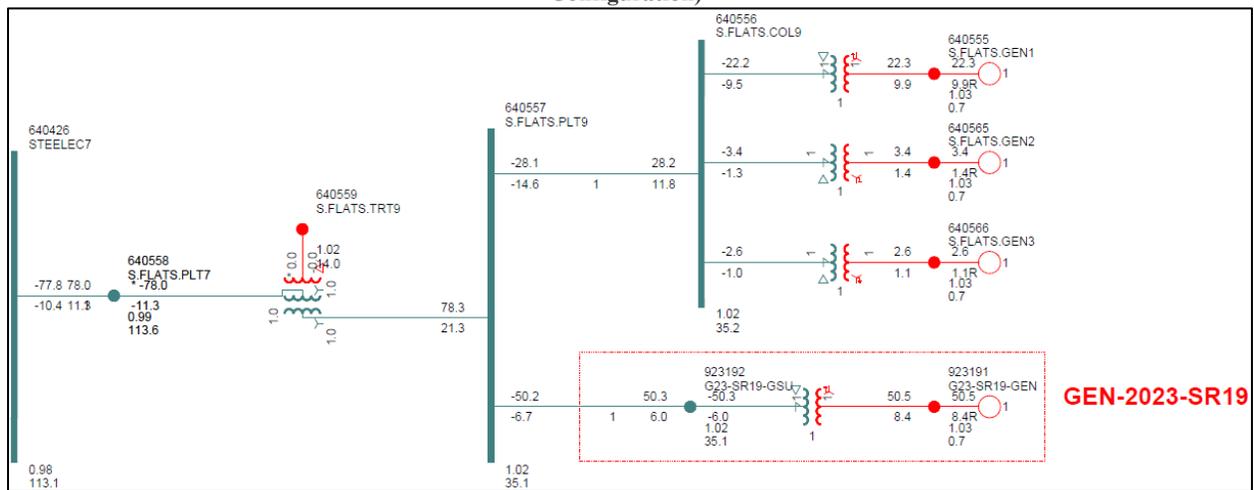
**Table 2-1: EGF & SGF Configuration**

Request	Interconnection Queue Capacity (MW)	Generator Fuel Type	Point of Interconnection
GEN-2023-SR19 (SGF)	50	Battery Energy Storage System (BESS)	STEELEC7 115 kV (542976)
GEN-2011-018 & GEN-2013-008 & GEN-2014-004 (EGF)	78.76	Wind	STEELEC7 115 kV (542976)

The proposed detailed SGF configuration is captured in Figure 2-2 and Table 2-2 below.

Aneden reviewed Generation Interconnection Requests (GIRs) that shared the same POI, STEELEC7 115 kV, and updated their models as applicable based on SPP’s confirmation of the latest project configurations. As a result, Aneden updated the EGF, GEN-2011-018 & GEN-2013-008 & GEN-2014-004, project configuration in the base models.

**Figure 2-2: GEN-2011-018 & GEN-2013-008 & GEN-2014-004& GEN-2023-SR19 Single Line Diagram (EGF & SGF Configuration)**



**Table 2-2: SGF Interconnection Configuration**

Facility	SGF Configuration
Point of Interconnection	STEELEC7 115 kV (640426)
Configuration/Capacity	17 x GE FLEX 1571 Inverters 2.972 MW (BESS) = 50.524 MW [dispatch] Units are rated at 4.4 MVA, PPC to limit GEN-2023-SR19 to 50 MW at the POI and total POI injection w/ GEN-2011-018 & GEN-2013-008 & GEN-2014-004 to 78.76 MW
Generation Interconnection Line (Shared with the EGF and unchanged from the Previous Modification <sup>1</sup> )	Length = 3.09 miles R = 0.0032 pu X = 0.165 pu B = 0.0024 pu Rating MVA = 149 MVA
Main Substation Transformer <sup>2</sup> (Shared with the EGF and unchanged from the Previous Modification <sup>1</sup> )	X12 = 8.0031% R12 = 0.2501%, X23 = 3.9988% R23 = 0.1%, X13 = 11.9963% R13 = 0.2999%, Winding MVA = 51 MVA, Winding 1, 2, & 3 Rating MVA = 85 MVA
Equivalent GSU Transformer <sup>2</sup>	Gen 1 Equivalent Qty: 17 X = 7.664%, R = 0.7441%, Winding MVA = 76.5 MVA, Rating MVA = 76.5 MVA
Equivalent Collector Line <sup>3</sup>	R = 0.002247 pu X = 0.004616 pu B = 0.008034 pu
Generator Dynamic Model <sup>4</sup> & Power Factor	17 x GE FLEX 1571 Inverters 4.4 MVA (REGCA1) <sup>4</sup> Leading: 0.675 Lagging: 0.675

1) EGF was modified in 2024, 2) X and R based on Winding MVA, 3) All pu are on 100 MVA Base, 4) DYR stability model name

### 3.0 Reactive Power Analysis

The reactive power analysis was performed for GEN-2023-SR19 to determine the capacitive charging effects due to the SGF 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.

#### 3.1 Methodology and Criteria

To determine the shunt reactor size required to compensate for the current charging attributed to the SGF collection system, the reactive power analysis for the EGF was determined first. Once the shunt size for the EGF was determined, the SGF incremental shunt reactor size was then calculated.

For each of the shunt reactor sizes calculated, all project generators were switched offline while other collector system elements remained in-service. For the SGF reactor size calculation, the EGF generators were also switched offline. A shunt reactor was tested at the project’s collection substation 34.5 kV bus to reduce 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 SGF data based on the 25SP DISIS-2021-001 Phase 2 stability study model.

#### 3.2 Results

Per the methodology described above, the shunt size was determined for the EGF prior to calculating the shunt reactor size for the SGF. The shunt size was found to be a 3 MVar reactor for the EGF to reduce the MVar injection at the POI to zero. Note that the EGF shunt value is for the SGF reactive size determination only and not for sizing the predetermined EGF reactive requirements.

The results from the analysis showed that the SGF needed an approximately 0.8 MVar shunt reactor at the SGF substation, to reduce the MVar injection at the POI to zero with the pre-determined shunt for the EGF in-service. The final shunt reactor requirements are shown in Table 3-1. Figure 3-1 illustrates the shunt reactor size needed to reduce the POI MVar to approximately zero.

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 3-1: Shunt Reactor Size for Reactive Power Analysis**

Machine	POI Bus Number	POI Bus Name	Reactor Size (MVar)
			25SP
GEN-2023-SR19 (SGF)	640426	STEELEC7 115 kV	0.8



## 4.0 Short Circuit Analysis

A short circuit study was performed using the 25SP model to determine the maximum available fault current requiring interruption by protective equipment with both the SGF and EGF online for each bus in the relevant subsystem, and the amount of increase in maximum fault current due to the addition of the SGF. The detailed results of the short circuit analysis are provided in Appendix B.

### 4.1 Methodology

The short circuit analysis included applying a 3-phase fault on buses up to 5 levels away from the 115 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 the SGF online. The first scenario was studied with both the SGF and EGF in service. In the second scenario the SGF was disconnected while the EGF was online to determine the impact of the SGF.

Aneden created a short circuit model using the 25SP DISIS-2021-001 Phase 2 stability study model by adjusting the SGF short circuit parameters consistent with the submitted data. The adjusted parameters used in the short circuit analysis are shown in Table 4-1 below. No other changes were made to the model.

**Table 4-1: Short Circuit Model Parameters\***

Parameter	Value by Generator Bus#
	923191
Machine MVA Base	74.8
R (pu)	0.0
X'' (pu)	0.8

\*pu values based on Machine MVA Base

### 4.2 Results

The results of the short circuit analysis compared the 25SP model with the EGF online and SGF not connected to the stability Scenario 2 dispatch model with both the EGF and SGF in service as described in Section 5.1. The GEN-2023-SR19 POI bus (STEELEC7 115 kV) fault current magnitudes for the comparison cases are provided in Table 4-2 showing a fault current of 5.35 kA with the EGF and SGF online. The addition of the SGF configuration increased the POI bus fault current by 0.28 kA. Table 4-3 shows the maximum fault current magnitudes and fault current increases with the SGF project online.

There were several buses with a maximum three-phase fault current over 40 kA. These buses are highlighted in Appendix B. The maximum contribution to three-phase fault currents due to the addition of the SGF was about 5.5% and 0.28 kA.

**Table 4-2: POI Short Circuit Comparison Results**

Case	EGF Only Current (kA)	SGF & EGF Current (kA)	kA Change	%Change
25SP	5.08	5.35	0.28	5.5%

**Table 4-3: 25SP Short Circuit Comparison Results**

Voltage (kV)	Max. Current (EGF & SGF) (kA)	Max kA Change	Max %Change
69	3.7	0.00	0.1%
115	43.7	0.28	5.5%
161	7.5	0.00	0.1%
230	7.0	0.00	0.0%
345	23.3	0.01	0.0%
<b>Max</b>	<b>43.7</b>	<b>0.28</b>	<b>5.5%</b>

## 5.0 Dynamic Stability Analysis

Aneden performed a dynamic stability analysis to identify the impact of the SGF project. The analysis was performed according to SPP's Disturbance Performance Requirements<sup>5</sup>. The project 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.

### 5.1 Methodology and Criteria

The dynamic stability analysis was performed using models developed with the requested 17 x GE FLEX 1571 operating at 2.972 MW (REGCA1) SGF generating facility configuration included in the models. This stability analysis was performed using Siemens PTI's PSS/E version 34.8.1 software.

The GEN-2023-SR19 project details were used to create modified stability models for this impact study based on the DISIS-2021-001 Phase 2 stability study models:

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

Two stability model scenarios were developed using these models. The first scenario (Scenario 1) was comprised of the SGF online at 100% of the assumed dispatch (SGF = 50.524 MW) while the EGF generator was offline and disconnected.

The second scenario (Scenario 2) was comprised of the SGF at 100% of the assumed dispatch (50.524 MW) while the EGF generator picked up the remaining EGF GIA capacity (EGF = 28.236 MW). The study scenarios are shown in Table 3-1.

**Table 5-1: Study Scenarios (Generator Dispatch MW)**

Scenario	GEN-2011-018 & GEN-2013-008 & GEN-2014-004 EGF (MW)	GEN-2023-SR19 SGF (MW)	EGF + SGF (MW)
1	0 (Offline)	50.524	50.524
2	28.236	50.524	78.76

Aneden reviewed Generation Interconnection Requests (GIRs) that shared the same POI, STEELEC7 115 kV and updated their models as applicable based on SPP's confirmation of the latest project configurations. As a result, Aneden updated the EGF, GEN-2011-018 & GEN-2013-008 & GEN-2014-004, project configuration in the base models.

The dynamic model data for the GEN-2023-SR19 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.

<sup>5</sup> SPP Disturbance Performance Requirements:

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

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

- The voltage protective relays at bus 923191 was disabled to avoid generator tripping due to an instantaneous over voltage spike after fault clearing.
- 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 the EGF and SGF and other current and prior queued projects in Group 2. In addition, voltages of five (5) buses away from the POI of the SGF were monitored and plotted. The machine rotor angle for synchronous machines and speed for asynchronous machines within the study areas including 330 (AECI), 531 (MIDW), 534 (SUNC), 536 (WERE), 541 (KCPL), 635 (MEC), 640 (NPPD), 641 (HAST), 642 (GRIS), 645 (OPPD), 650 (LES), 652 (WAPA), and 659 (BEPC-SPP) were monitored. The voltages of all 100 kV and above buses within the study area were monitored as well.

**5.2 Fault Definitions**

Aneden developed fault events as required to study the SGF. 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 5-2 below. These contingencies were applied to the modified 25SP and 25WP models.

**Table 5-2: Fault Definitions**

Fault ID	Planning Event	Fault Descriptions
FLT1000-SB	P4	Stuck Breaker on STEELEC7 (640426) 115 kV Bus a. Apply single phase fault at the STEELEC7 (640426) 115 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip bus STEELEC7 (640426) 115 kV. Trip generator(s) on the Bus S.FLATS.GEN1 (640555) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN2 (640565) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN3 (640566) 0.7 kV Trip generator(s) on the Bus G23-SR19-GEN (923191) 0.7 kV
FLT1001-SB	P4	Stuck Breaker on STEELEC7 (640426) 115 kV Bus a. Apply single phase fault at the STEELEC7 (640426) 115 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the STEELEC7 (640426) 115 kV to HARBINE7 (640208) 115 kV line CKT 1. b.2.Trip the STEELEC7 (640426) 115 kV / STEELEC_KXL9 (640440) 6.9 kV XFMR CKT 1. b.3.Trip the STEELEC7 (640426) 115 kV / STEELEC9 (640427) 4.2 kV XFMR CKT 1.
FLT1002-SB	P4	Stuck Breaker on STEELEC7 (640426) 115 kV Bus a. Apply single phase fault at the STEELEC7 (640426) 115 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip the STEELEC7 (640426) 115 kV to S.FLATS.PLT7 (640558) 115 kV line CKT 1. b.2.Trip the STEELEC7 (640426) 115 kV to KNOB HL3 (533332) 115 kV line CKT 1. Trip generator(s) on the Bus S.FLATS.GEN1 (640555) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN2 (640565) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN3 (640566) 0.7 kV Trip generator(s) on the Bus G23-SR19-GEN (923191) 0.7 kV
FLT1003-SB	P4	Stuck Breaker on KNOB HL3 (533332) 115 kV Bus a. Apply single phase fault at the KNOB HL3 (533332) 115 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip bus KNOB HL3 (533332) 115 kV.
FLT1004-SB	P4	Stuck Breaker on HARBINE7 (640208) 115 kV Bus a. Apply single phase fault at the HARBINE7 (640208) 115 kV Bus b. Clear fault after 16 cycles and trip the following elements: b.1.Trip bus HARBINE7 (640208) 115 kV.
FLT9000-3PH	P1	3 Phase fault on STEELEC7 (640426) 115 kV to S.FLATS.PLT7 (640558) 115 kV line CKT 1, near STEELEC7 (640426) 115 kV. a. Apply fault at the STEELEC7 (640426) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. Trip generator(s) on the Bus G23-SR19-GEN (923191) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN1 (640555) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN2 (640565) 0.7 kV Trip generator(s) on the Bus S.FLATS.GEN3 (640566) 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 STEELEC7 (640426) 115 kV to STEELEC_KXL9 (640440) 6.9 kV XFMR CKT 1, near STEELEC7 (640426) 115 kV. a. Apply fault at the STEELEC7 (640426) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line.
FLT9002-3PH	P1	3 Phase fault on STEELEC7 (640426) 115 kV to STEELEC9 (640427) 4.2 kV XFMR CKT 1, near STEELEC7 (640426) 115 kV. a. Apply fault at the STEELEC7 (640426) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line.
FLT9003-3PH	P1	3 Phase fault on STEELEC7 (640426) 115 kV to KNOB HL3 (533332) 115 kV line CKT 1, near STEELEC7 (640426) 115 kV. a. Apply fault at the STEELEC7 (640426) 115 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 5-2 Continued

Fault ID	Planning Event	Fault Descriptions
FLT9004-3PH	P1	3 Phase fault on KNOB HL3 (533332) 115 kV to STEELEC7 (640426) 115 kV line CKT 1, near KNOB HL3 (533332) 115 kV. a. Apply fault at the KNOB HL3 (533332) 115 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 STEELEC7 (640426) 115 kV to HARBINE7 (640208) 115 kV line CKT 1, near STEELEC7 (640426) 115 kV. a. Apply fault at the STEELEC7 (640426) 115 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.
FLT9006-3PH	P1	3 Phase fault on HARBINE7 (640208) 115 kV to STEELEC7 (640426) 115 kV line CKT 1, near HARBINE7 (640208) 115 kV. a. Apply fault at the HARBINE7 (640208) 115 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 KNOB HL3 (533332) 115 kV to MARSHAL3 (533303) 115 kV line CKT 1, near KNOB HL3 (533332) 115 kV. a. Apply fault at the KNOB HL3 (533332) 115 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 MARSHAL3 (533303) 115 kV to KNOB HL3 (533332) 115 kV line CKT 1, near MARSHAL3 (533303) 115 kV. a. Apply fault at the MARSHAL3 (533303) 115 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.
FLT9009-3PH	P1	3 Phase fault on KNOB HL3 (533332) 115 kV to GRNLEAF3 (539665) 115 kV line CKT 1, near KNOB HL3 (533332) 115 kV. a. Apply fault at the KNOB HL3 (533332) 115 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 GRNLEAF3 (539665) 115 kV to KNOB HL3 (533332) 115 kV line CKT 1, near GRNLEAF3 (539665) 115 kV. a. Apply fault at the GRNLEAF3 (539665) 115 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 HARBINE7 (640208) 115 kV to BEATRCE7 (640076) 115 kV line CKT 1, near HARBINE7 (640208) 115 kV. a. Apply fault at the HARBINE7 (640208) 115 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 BEATRCE7 (640076) 115 kV to HARBINE7 (640208) 115 kV line CKT 1, near BEATRCE7 (640076) 115 kV. a. Apply fault at the BEATRCE7 (640076) 115 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 HARBINE7 (640208) 115 kV to FAIRBRY7 (640169) 115 kV line CKT 1, near HARBINE7 (640208) 115 kV. a. Apply fault at the HARBINE7 (640208) 115 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 5-2 Continued

Fault ID	Planning Event	Fault Descriptions
FLT9014-3PH	P1	3 Phase fault on FAIRBRY7 (640169) 115 kV to HARBINE7 (640208) 115 kV line CKT 1, near FAIRBRY7 (640169) 115 kV. a. Apply fault at the FAIRBRY7 (640169) 115 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.
FLT9015-3PH	P1	3 Phase fault on MARSHAL3 (533303) 115 kV to GEN-2009-040 (575061) 115 kV line CKT 1, near MARSHAL3 (533303) 115 kV. a. Apply fault at the MARSHAL3 (533303) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. Trip generator(s) on the Bus MARSHGEN1 (532904) 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.
FLT9016-3PH	P1	3 Phase fault on MARSHAL3 (533303) 115 kV to SMITTYV3 (533338) 115 kV line CKT 1, near MARSHAL3 (533303) 115 kV. a. Apply fault at the MARSHAL3 (533303) 115 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.
FLT9017-3PH	P1	3 Phase fault on GRNLEAF3 (539665) 115 kV / GRNLEAF1 (539711) 34.5 kV / GRNLEAF-T (539911) 12.8 kV XFMR CKT 1, near GRNLEAF3 (539665) 115 kV. a. Apply fault at the GRNLEAF3 (539665) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line. Trip generator(s) on the Bus GRNLEAF1 (539711) 34.5 kV
FLT9018-3PH	P1	3 Phase fault on GRNLEAF3 (539665) 115 kV to CLIFTON3 (539656) 115 kV line CKT 1, near GRNLEAF3 (539665) 115 kV. a. Apply fault at the GRNLEAF3 (539665) 115 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.
FLT9019-3PH	P1	3 Phase fault on BEATRCE7 (640076) 115 kV to STEINER7 (640361) 115 kV line CKT 1, near BEATRCE7 (640076) 115 kV. a. Apply fault at the BEATRCE7 (640076) 115 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.
FLT9020-3PH	P1	3 Phase fault on BEATRCE7 (640076) 115 kV to BEAT. S7 (640074) 115 kV line CKT 1, near BEATRCE7 (640076) 115 kV. a. Apply fault at the BEATRCE7 (640076) 115 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.
FLT9021-3PH	P1	3 Phase fault on BEATRCE7 (640076) 115 kV / BEATRCE9 (640077) 34.5 kV / BEATRICE T29 (643014) 13.8 kV XFMR CKT 1, near BEATRCE7 (640076) 115 kV. a. Apply fault at the BEATRCE7 (640076) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line.
FLT9022-3PH	P1	3 Phase fault on BEATRCE7 (640076) 115 kV to BPS SUB7 (640088) 115 kV line CKT 2, near BEATRCE7 (640076) 115 kV. a. Apply fault at the BEATRCE7 (640076) 115 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.
FLT9023-3PH	P1	3 Phase fault on FAIRBRY7 (640169) 115 kV / FAIRBRYG (640170) 34.5 kV / FAIRBURY T19 (643056) 13.8 kV XFMR CKT 1, near FAIRBRY7 (640169) 115 kV. a. Apply fault at the FAIRBRY7 (640169) 115 kV Bus. b. Clear fault after 7 cycles by tripping the faulted line.
FLT9024-3PH	P1	3 Phase fault on FAIRBRY7 (640169) 115 kV to HEBRN N7 (640218) 115 kV line CKT 1, near FAIRBRY7 (640169) 115 kV. a. Apply fault at the FAIRBRY7 (640169) 115 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.

**5.3 Scenario 1 Results**

Table 5-3 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 5-3: Scenario 1 Dynamic Stability Results (EGF = 0 MW, SGF = 50.524 MW)**

Fault ID	25SP			25WP		
	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
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
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
FLT9014-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9015-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9016-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9017-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9018-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9019-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9020-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9021-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9022-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9023-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9024-3PH	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 Phase 2 models and the models with GEN-2023-SR19 included. These issues were not attributed to the GEN-2023-SR19 surplus request and detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2023-SR19 surplus 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.

**5.4 Scenario 2 Results**

Table 5-4 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 5-4: Scenario 2 Dynamic Stability Results (EGF = 28.236 MW, SGF = 50.524 MW)**

Fault ID	25SP			25WP		
	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
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
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
FLT9014-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9015-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9016-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9017-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9018-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9019-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9020-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9021-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9022-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9023-3PH	Pass	Pass	Stable	Pass	Pass	Stable
FLT9024-3PH	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 Phase 2 models and the models with GEN-2023-SR19 included. These issues were not attributed to the GEN-2023-SR19 surplus request and detailed in Appendix C.

There were no damping or voltage recovery violations attributed to the GEN-2023-SR19 surplus 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.

## 6.0 Necessary Interconnection Facilities and Network Upgrades

This study identified the impact of the Surplus Interconnection Service on the transmission system reliability and any additional Interconnection Facilities or Network Upgrades necessary. The Surplus Interconnection Service is only available up to the amount that can be accommodated without requiring additional Network Upgrades unless (a) those additional Network Upgrades are either (1) located at the Point of Interconnection substation and at the same voltage level as the Generating Facility with an effective GIA, or (2) are System Protection Facilities; and (b) there are no material adverse impacts on the cost or timing of any Interconnection Requests pending at the time the Surplus Interconnection Service request is submitted.

### 6.1 Interconnection Facilities

This study did not identify any additional Interconnection Facilities required by the addition of the SGF.

### 6.2 Network Upgrades

This study did not identify any Network Upgrades required by the addition of the SGF. SPP will reach out to the TO and/or TOP to determine if there are any additional Network Upgrades that are either (1) located at the Point of Interconnection substation and at the same voltage level as the Generating Facility with an effective GIA, or (2) are System Protection Facilities.

## 7.0 Surplus Interconnection Service Determination and Requirements

In accordance with Attachment V of the SPP Tariff, SPP shall evaluate the request for Surplus Interconnection Service and inform the Interconnection Customer in writing of whether the Surplus Interconnection Service can be utilized without negatively impacting the reliability of the Transmission System and without any additional Network Upgrades necessary except those specified in the SPP Tariff.

### 7.1 Surplus Service Determination

SPP determined the request for Surplus Interconnection Service does not negatively impact the reliability of the Transmission System and no required Network Upgrades or Interconnection Facilities were identified by this Surplus Interconnection Service Impact Study performed by Aneden. Aneden evaluated the impact of the requested Surplus Interconnection Service on the prior study results and determined that the requested Surplus Interconnection Service resulted in similar dynamic stability and short circuit analyses and that the prior study steady-state results are not negatively impacted.

SPP has determined that GEN-2023-SR19 may utilize the requested 50 MW of Surplus Interconnection Service being made available by the combined GEN-2011-018 & GEN-2013-008 & GEN-2014-004.

### 7.2 Surplus Service Requirements

The amount of Surplus Interconnection Service available to be used is limited by the amount of Interconnection Service granted to the existing interconnection customer at the same POI. The combined generation from both the SGF and the EGF may not exceed 78.76 MW at the POI, which is the total Interconnection Service amount currently granted to the EGF.

The customer must install monitoring and control equipment as needed to ensure that the SGF does not exceed the granted surplus amount and to ensure that combination of the SGF and EGF power injected at the POI does not exceed the Interconnection Service amount listed in the EGF's GIA. The monitoring and control scheme may be reviewed by the TO and documented in Appendix C of the SGF GIA.

SPP will reach out to the TO and/or TOP to determine if there are any additional Network Upgrades that are either (1) located at the Point of Interconnection substation and at the same voltage level as the Generating Facility with an effective GIA, or (2) are System Protection Facilities.