



Craig W. Silverstein
craig.silverstein@marchcounsel.com
202.640.2111

July 27, 2021

VIA ETARIFF/ELECTRONIC FILING

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

Re: *Golden Spread Electric Cooperative, Inc.*
Docket No. ER21-___-000
Proposed Open Access Transmission Tariff Revisions
Order No. 676-I Compliance and Request for Continued Waivers
Filing Type Code: 80

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission's ("Commission") directive in Order No. 676-I,¹ and pursuant to its Notice of Extension of Time,² Golden Spread Electric Cooperative, Inc. ("Golden Spread") hereby submits for filing its compliance filing to amend Attachment S to Golden Spread's Open Access Transmission Tariff ("OATT or Tariff") to incorporate by reference certain Standards for Business Practices and Communication Protocols for Public Utilities adopted by the Wholesale Electric Quadrant ("WEQ") of the North American Energy Standards Board ("NAESB"). Golden Spread is also concurrently requesting continued waivers of incorporation by reference of certain WEQ standards.

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

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, 170 FERC ¶ 61,062 (2020) (Order No. 676-I), *order on clarification*, 173 FERC ¶ 61,173 (2020).

² Notice of Extension of Time, *Standards for Business Practices and Communication Protocols for Public Utilities*, Docket No. RM05-05-028 (April 3, 2020).

The Honorable Kimberly D. Bose
July 27, 2021
Page 2

I. COMMUNICATIONS

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

Shane McMinn
Director of Power Delivery
Michael Johnson
Power Delivery Services
Maggie Berry
Associate General Counsel
Golden Spread Electric Cooperative, Inc.
Post Office Box 9898
Amarillo, Texas 79105-5898
(806) 379-7766 (telephone)
(806) 374-2922 (facsimile)
shane@gsec.coop
mjohnson@gsec.coop
mberry@gsec.coop

* Craig Silverstein
March Counsel LLC
1201 Connecticut Avenue, NW
6th Floor
Washington, D.C. 20036
(202) 640-2111 (Phone)
craig.silverstein@marchcounsel.com

II. BACKGROUND

A. DESCRIPTION OF GOLDEN SPREAD AND ITS TARIFF

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

On June 18, 1987, the Commission determined that Golden Spread was a public utility subject to the Commission's jurisdiction and accepted Golden Spread's initial rates to provide wholesale full requirements service to its member systems pursuant to Section 205 of the FPA. On April 24, 2012, the Commission accepted Golden Spread's OATT for filing.³ Concurrent with that acceptance and in subsequent orders, Golden Spread was granted a waiver of standards of conduct and the obligation to operate an open-access same-time information system ("OASIS").⁴ Due to the

³ *Golden Spread Electric Cooperative, Inc.*, 139 FERC ¶ 61,067 (2012). Golden Spread's limited owned facilities within the SPP region are comprised of facilities that Golden Spread has financed and/or constructed (as needed) on behalf of its requesting members ("Special Facilities") that are used to supply the loads of the specific member participating in what is referred to as "Rider A" of Golden Spread's requirements wholesale power contract with its member. Golden Spread has one third party generator that takes service pursuant to its OATT.

⁴ *Black Hills Power, Inc., et al.*, 135 FERC ¶ 61,058, P 48 (2011), *aff'd Golden Spread Electric Cooperative, Inc.*, Docket No. ER11-3404-002 (Jan. 24, 2014) (unpublished letter order).

The Honorable Kimberly D. Bose
July 27, 2021
Page 3

discrete nature of its facilities, all transmission service purchased or requested on the Golden Spread system under its OATT has been point-to-point service; there are no network integration transmission service customers and Part III of the Tariff has been eliminated. Golden Spread's transmission system is fully embedded in other control areas; Golden Spread does not provide any control area services and it does not operate as a balancing authority area.

B. PRIOR ORDER NO. 676-H COMPLIANCE

In late 2014, Golden Spread submitted a compliance filing in accordance with Order No. 676-H⁵ in Docket No. ER15-528-000.⁶ Subsequently, in an order issued on May 18, 2015, the Commission (1) conditionally accepted Golden Spread's filing, including a request for waiver of WEQ-001,⁷ WEQ-002, WEQ-003, WEQ-008, WEQ-012 and WEQ-013, (ii) denied waiver of WEQ-011 and WEQ-000, and (iii) denied as moot requested waivers of WEQ-005 through WEQ-008, WEQ-015 and WEQ-021, that the Commission determined was unnecessary.⁸ With respect to item (iii), the Commission explained:

In the 676-H Rehearing Order, we clarified that

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

The Commission explained that including such standards in the public utility's tariff will have no adverse effects on the company, since the standards would not impose the compliance obligation prescribed by the standard on that entity. The Commission stated that, in each public utility's compliance filing in which it submits a tariff revision incorporating the NAESB standards, the public utility must either incorporate by reference each standard or indicate in its tariff that it has obtained a waiver of that standard.⁹

⁵ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 148 FERC ¶ 61,205 (2014), *reh'g*, 151 FERC ¶ 61,046 (2015).

⁶ Order No. 676-H Compliance, *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-000 (December 1, 2014).

⁷ With respect to WEQ-001, the Commission excluded Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2, and 001-106.2.5.

⁸ *Golden Spread Electric Cooperative, Inc.*, 151 FERC ¶ 61,142 (2015).

⁹ *Id.* at P 20, citing Order No. 676-H Rehearing Order, 151 FERC ¶ 61,046 at P 20.

The Honorable Kimberly D. Bose
July 27, 2021
Page 4

Golden Spread's compliance filing was subsequently made¹⁰ and accepted by the Commission,¹¹ and Attachment S of its Tariff currently contains the requisite reference to the NAESB WEQ standards referred to in Order No. 676-H as well as the list of standards for which waiver was granted.

III. PROPOSED TARIFF REVISIONS AND REQUEST FOR CONTINUED WAIVER

In the instant compliance filing, and based on the Commission's earlier directives with respect to waivers of specific standards set out in Section II. b., above, Golden Spread proposes to adopt and incorporate by reference the list of NAESB WEQ standards set out in Order No. 676-I and 18 CFR § 38.1 (2020). Golden Spread also requests continued waiver of WEQ-001, WEQ-002, WEQ-003, WEQ-008, WEQ-012 and WEQ-013.

Good cause exists to continue such waivers of these NAESB standards because the circumstances under which the Commission originally granted the waivers to Golden Spread have not changed. Specifically, as referenced in its 2015 waiver order, "(1) [Golden Spread's] transmission facilities remain limited and discrete; (2) those facilities still do not constitute an integrated transmission system; and (3) it still does not operate a balancing authority."¹² Moreover, the Commission has consistently granted Golden Spread waiver of the requirement to establish and maintain an OASIS, and the Commission also granted Golden Spread waiver of the Eastern Interconnection TLR Procedures.¹³ Accordingly, continued waiver of these NAESB standards is appropriate.

The NAESB WEQ standards and the list of standards subject to the waiver will be incorporated in Attachment S to the Golden Spread OATT.

IV. ADDITIONAL INFORMATION

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

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

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

¹¹ *Golden Spread Electric Cooperative, Inc.*, Docket No. ER15-528-002 (unpublished letter order dated September 3, 2015).

¹² 151 FERC ¶ 61,142 at P 10 (citations omitted).

¹³ *Black Hills Power, Inc., et al.*, 135 FERC ¶ 61,058, P 48 (2011), *aff'd Golden Spread Electric Cooperative, Inc.*, Docket No. ER11-3404-002 (Jan. 24, 2014) (unpublished letter order); *Golden Spread Electric Cooperative, Inc.*, 139 FERC ¶ 61,067 (2012).

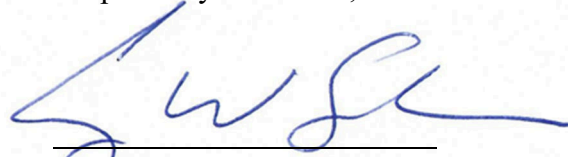
The Honorable Kimberly D. Bose
July 27, 2021
Page 5

Consistent with the instruction set out in Order No. 676-I, Golden Spread has included an indeterminate effective date of 12/31/9998 within its eTariff records.

V. CONCLUSION

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

Respectfully submitted,



Craig Silverstein
March Counsel LLC
1201 Connecticut Avenue, NW
6th Floor
Washington, D.C. 20036
(202) 640-2111 (Phone)
craig.silverstein@marchcounsel.com

*Counsel for Golden Spread Electric
Cooperative, Inc.*

Attachments

CERTIFICATE OF SERVICE

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

Dated at Washington, D.C., this 27th day of July, 2021.



Craig W. Silverstein

ATTACHMENT S**NAESB WEQ STANDARDS**

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

1. WEQ-000, Abbreviations, Acronyms, and Definition of Terms, (WEQ Version 003.1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
2. WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
3. WEQ-004, Coordinate Interchange, (WEQ Version 003.2, Dec. 8, 2017);
4. WEQ-005, Area Control Error (ACE) Equation Special Cases, (WEQ Version 003.2, Dec. 8, 2017);
5. WEQ-006, Manual Time Error Correction, (WEQ Version 003.1, Sept. 30, 2015);
6. WEQ-007, Inadvertent Interchange Payback, (WEQ Version 003.2, Dec. 8, 2017);
7. WEQ-011, Gas / Electric Coordination,; WEQ Version 003.2, Dec. 8, 2017;
8. WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, (WEQ Version 003.2, Dec. 8, 2017);
9. WEQ-021, Measurement and Verification of Energy Efficiency Products, (WEQ Version 003.2, Dec. 8, 2017);
10. WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
11. WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

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

1. WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards

WEQ-001-9 preamble text, WEQ-001-10 preamble text;

2. WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
3. WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
4. WEQ-008, Transmission Loading Relief (TLR) - Eastern Interconnection, (WEQ Version 003.2, Dec. 8, 2017);
5. WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017);
6. WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017).

ATTACHMENT S**NAESB WEQ STANDARDS**

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

1. WEQ-000, Abbreviations, Acronyms, and Definition of Terms, (WEQ Version 003.1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
2. WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
3. WEQ-004, Coordinate Interchange, (WEQ Version 003.2, Dec. 8, 2017);
4. WEQ-005, Area Control Error (ACE) Equation Special Cases, (WEQ Version 003.2, Dec. 8, 2017);
5. WEQ-006, Manual Time Error Correction, (WEQ Version 003.1, Sept. 30, 2015);
6. WEQ-007, Inadvertent Interchange Payback, (WEQ Version 003.2, Dec. 8, 2017);
7. WEQ-011, Gas / Electric Coordination,; WEQ Version 003.2, Dec. 8, 2017;
8. WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, (WEQ Version 003.2, Dec. 8, 2017);
9. WEQ-021, Measurement and Verification of Energy Efficiency Products, (WEQ Version 003.2, Dec. 8, 2017);
10. WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
11. WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

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

1. WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards

WEQ-001-9 preamble text, WEQ-001-10 preamble text;

2. WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
3. WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
4. WEQ-008, Transmission Loading Relief (TLR) - Eastern Interconnection, (WEQ Version 003.2, Dec. 8, 2017);
5. WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017);
6. WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.2 (WEQ Version 003.2, Dec. 8, 2017).

FERC rendition of the electronically filed tariff records in Docket No. ER21-02513-000

Filing Data:

CID: C001298

Filing Title: Order No. 676-I Compliance and Waiver

Company Filing Identifier: 20210727

Type of Filing Code: 80

Associated Filing Identifier:

Tariff Title: Open Access Transmission Tariff

Tariff ID: 4

Payment Confirmation:

Suspension Motion:

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

OATT Attachment S, ATTACHMENT S NAESB WEQ Standards, 1.0.0, A

Record Narrative Name:

Tariff Record ID: 67

Tariff Record Collation Value: 67103 Tariff Record Parent Identifier: 0

Proposed Date: 9998-12-31

Priority Order: 505

Record Change Type: CHANGE

Record Content Type: 1

Associated Filing Identifier:

ATTACHMENT S

NAESB WEQ STANDARDS

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

1. WEQ-000, Abbreviations, Acronyms, and Definition of Terms, (WEQ Version 003.1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
2. WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
3. WEQ-004, Coordinate Interchange, (WEQ Version 003.2, Dec. 8, 2017);
4. WEQ-005, Area Control Error (ACE) Equation Special Cases, (WEQ Version 003.2, Dec. 8, 2017);
5. WEQ-006, Manual Time Error Correction, (WEQ Version 003.1, Sept. 30, 2015);
6. WEQ-007, Inadvertent Interchange Payback, (WEQ Version 003.2, Dec. 8, 2017);
7. WEQ-011, Gas / Electric Coordination,; WEQ Version 003.2, Dec. 8, 2017;
8. WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, (WEQ Version 003.2, Dec. 8, 2017);

9. WEQ-021, Measurement and Verification of Energy Efficiency Products, (WEQ Version 003.2, Dec. 8, 2017);
10. WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
11. WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

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

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

Document Content(s)

Transmittal Letter.PDF.....	1
Clean Tariff.RTF.....	7
Marked Tariff.RTF.....	9
FERC GENERATED TARIFF FILING.RTF.....	11