



Department of Energy
Western Area Power Administration
P.O. Box 281213
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June 9, 2005

Honorable Magalie Roman Salas
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A, East
Washington, DC 20426

Dear Secretary Salas:

Enclosed for filing with the Federal Energy Regulatory Commission in Docket No. RM02-12-000 is an original electronic filing of the attached document entitled "Filing of the Western Area Power Administration, United States Department of Energy".

If you have any questions about this filing, please contact me at the number listed above. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Ronald J. Klinefelter".

Ronald J. Klinefelter
Attorney
Office of General Counsel

Enclosure

**IN THE UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Standardization of Small Generator)
Interconnection Agreements and) Docket No. RM02-12-000
Procedures)

**FILING OF THE WESTERN AREA POWER ADMINISTRATION
OF THE UNITED STATES DEPARTMENT OF ENERGY**

I. INTRODUCTION

The Western Area Power Administration (Western), a Federal Power Marketing Administration of the United States Department of Energy, makes this filing in response to the Federal Energy Regulatory Commission's (Commission) Standardization of Small Generator Interconnection Agreements (SGIA) and Small Generator Interconnection Procedures (SGIP) Final Order (Order 2006), issued May 12, 2005¹.

Order 2006 amends the Commission's regulations and requires public utilities that own, control, or operate

¹ Standardization of Small Generator Interconnection Agreements and Procedures, Order No. 2006, 111 FERC ¶ 61,220 (2005).

facilities for transmitting electric energy in interstate commerce to amend their open access transmission tariffs to include SGIP and SGIA for devices used for the production of electricity with a capacity of no more than 20 megawatts. The Commission has stated that the open access transmission tariffs of all non-independent Transmission Providers are deemed revised to include the SGIP and SGIA.²

II. BACKGROUND

Western is a Federal power marketing administration of the United States Department of Energy. It markets Federal power and provides transmission service in fifteen western states. Western markets Federal power generated at facilities operated by the United States Army Corps of Engineers, the Bureau of Reclamation within the Department of Interior as well as the International Boundary and Water Commission. Western owns and operates over 17,000 miles of electrical transmission lines and appurtenant facilities within this same region.

As a Federal power marketing administration, Western is not subject to the Commission's jurisdiction as a public

² id. at P 544.

utility. However, Western has an approved Open Access Transmission Tariff (OATT) on file with the Commission to meet its reciprocity requirements.³ Western filed a revision to its OATT on January 25, 2005 that is pending before the Commission to incorporate the Large Generator Interconnection Procedures and Large Generator Interconnection Agreement pursuant to Order Nos. 2003, 2003-A and 2003-B.⁴

III. PURPOSE OF FILING

The purpose of this filing is to clarify that Western's OATT will not be revised to include the pro forma SGIP and SGIA as of the effective date of Order 2006. While generally supportive of the SGIP and SGIA, Western cannot adopt some of the provisions due to legal, regulatory or other business limitations. Therefore, Western intends to adopt revised SGIP and SGIA documents at a later date. Until such time as Western adopts these

³ United States Department of Energy - Western Area Power Administration, 99 FERC ¶ 61,062 (2002).

⁴ Standardization of Generator Interconnection Agreements and Procedures, Order No. 2003, Final Rule, FERC Stats. & Regs. ¶ 31,146 (2003), order on reh'g, Order No. 2003-A, FERC Stats. & Regs. ¶ 31,160 (2004) (Order No. 2003-A), order on reh'g, Order No. 2003-B, 70 FR 265 (Jan. 4, 2005), (Order 2003-B).

revised documents, Western's existing tariff and interconnection procedures shall remain in effect.

IV. SERVICE

Western hereby respectfully requests a waiver of the requirements set forth in 18 C.F.R. § 385.2010 due to the volume of interested parties in this matter and the limited nature of this filing. This filing has been electronically posted on Western's web site at the following address for interested parties to view:

wapa.gov/transmission/SGInotice6905.pdf. Paper copies will be made available to any person upon request. In addition, Western has placed a notice on its Open Access Same-time Information Systems regarding this filing.

Dated this 9th day of June, 2005.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have not this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding. Instead, I have requested a waiver of the Commission's service requirements as outlined in the document.

Dated at Lakewood, Colorado, this 9th day of June, 2005.

By:



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