

WESTERN AREA POWER ADMINISTRATION
RMR and CRSP
Rate Brochures for Proposed Rates for WEIS Market Participation
Consolidated MEAN Comments and WAPA's Responses

RMR Page 11/CRSP Page 8: Do I read the schedule correctly that there is not a comment period after WAPA finalizes the administrative fee and rate package?

Response: That is correct. Rates for short-term sales do not follow the formal procedures for public participation in power and transmission rate adjustments and extensions. However, to be transparent regarding implementation of these rates for short-term sales, RMR and CRSP provided the rate brochures and sought public comments. Once we have considered all comments received by the November 27th deadline, WAPA will make necessary adjustments and then finalize the rate packages.

CRSP Page 4: RMR (WACM BA Services and LAP Transmission Service) and UGP have separate brochures and/or other documents to discuss their rates, processes, etc. related to those offices/projects joining the WEIS Market. How will WAPA ensure consistency and avoid conflicting info between the three separate brochures?

Response: WAPA conducted one public stakeholder process for revisions to its OATT for RMR and CRSP's participation in the WEIS Market. RMR and CRSP have and will continue to work closely with each other and with UGP in preparing coordinated rate schedule language as proposed in RMR's and CRSP's rate brochures, while recognizing the unique circumstances for each regional office.

UGP does not offer transmission and applicable ancillary services under the WAPA Tariff, so they may ultimately have different provisions. UGP's rate brochure that included discussions regarding participating in a Western Interconnection energy imbalance market was posted in Sept. 2019, and their subsequent Rate Order was published on July 14, 2020.

In addition, RMR operates the WACM BA, and as such, will have additional provisions under WEIS than LAPT and CRCM TSPs need for offering JDTS and imbalance services under the OATT. Those additional provisions for the WACM BA are discussed in RMR's brochure and will be further detailed in WACM's business practices.

CRSP Page 6: That last sentence indicates “the need for Federal Register notices for WEIS Short-Term Rates and Joint Dispatch Transmission Service”. When will the FRNs be posted?

Response: CRSP’s slide should have stated that an FRN is not required for implementation of a rate for short-term sales, and CRSP is not preparing an FRN for the rate for short-term sales of JDTS. However, once CRSP enters the formal rate process to put the JDTS rate in place for a 5-year rate period, as discussed in section VI, the proposal and rate order FRNs will be published according to the schedule that is outlined in the rate brochure.

CRSP Page 9: Should the reference to “Section IV” be Section V?

Response: Yes, that is correct. CRSP will make this edit in the updated brochure.

RMR Page 8: I believe the date reference should be 2020.

Response: Yes, it should be 2020. RMR will make this edit in the updated brochure.

RMR Page 13: Could WAPA provide more details behind the administrative fee calculations/numbers, such as staff hours, etc.

Response: A couple of customers have asked for additional details regarding the administrative fee. RMR is considering how we might be able to provide a bit more information. If we do so, that information will be included in RMR’s updated brochure.

RMR Page 13: Could WAPA provide additional information to clarify/explain the differences between the Settlements Software Tool and the Settlements bulleted line items?

Response: The first bullet is the off the shelf software tool purchased from OATI. The second bullet is RMR’s Settlements staff that performs various activities for the non-MPs.

RMR Page 14: Is the IT support bullet line item staff time (if so, could we get number of staff hours) and/or is it related to equipment?

Response: The IT bulleted item is for 360 hours of WAPA’s IT staff time associated with managing the OATI software tool listed in the first bullet and assisting with the automated meter data transfer process.

RMR Page 14: As noted above, can WAPA provide the estimated number of hours for the “WEIS non-participant hours as compared to the total staff hours of the applicable functional areas”?

Response: RMR is allocating 7,193 hours per year as “WEIS non-participant” hours and then dividing that by the total 122,694 staff hours per year for these functional areas, which equates to 5.86% as shown in Table 2 on page 15.

RMR Page 25: Should WAPA be passing through charges (OOME, URD) where WAPA was 'at fault' causing these charges?

Response: Charges incurred by the BA are burdened by the BA customers. If the BA, in its duties as performing the function of a BA, incurs an Out-of-Merit Energy distribution or an Uninstructed Resource Deviation charge, RMR will work to distribute the charges to the entity that was the cause. If the information is not sufficient to determine who caused the excursion, then the charges will be distributed amongst the BA customers or non-participant BA customers as appropriate.