150 FERC ¶ 61,242
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
Norman C. Bay, and Colette D. Honorable.

Southwest Power Pool, Inc. Docket No. ER15-763-000

ORDER CONDITIONALLY ACCEPTING TARIFF REVISIONS

(Issued March 31, 2015)

1. On December 30, 2014, pursuant to section 205 of the Federal Power Act (FPA)[1] and Part 35 of the Commission's regulations,[2] Southwest Power Pool, Inc. (SPP) submitted revisions to its Open Access Transmission Tariff (Tariff) to implement a design change for the distribution of Over-Collected Losses in SPP's Integrated Marketplace. In this order, we conditionally accept SPP's proposal, to be effective April 1, 2015, subject to a compliance filing.

I. Background

2. SPP charges locational marginal prices (LMP) for wholesale delivery of electricity. LMP is composed of the marginal energy component, the marginal congestion component, and the marginal loss component. The Commission has previously recognized that the estimation of losses on a marginal basis results in an over-collection that must be refunded in some manner.[3]

3. SPP calculates and distributes Over-Collected Losses separately for the Day-Ahead Market (Day-Ahead market) and Real-Time Balancing Market (Real-Time

[1] 16 U.S.C. § 824d (2012).

[2] 18 C.F.R. pt. 35 (2014).

[3] *See, e.g.*, *Sw. Power Pool, Inc.*, 141 FERC ¶ 61,048, at P 211 (2012).

market). SPP distributes the Over-Collected Losses based on a loss pool[4] methodology whereby it calculates the contribution of each loss pool to the total over-collection, and then it distributes Over-Collected Losses to each loss pool an amount based on this contribution. For the Day-Ahead market, SPP determines each loss pool's share of the Over-Collected Losses based on that loss pool's net scheduled consumption, net scheduled exports, and net virtual transactions.[5] For the Real-Time market, SPP determines each loss pool's share of the Over-Collected Losses based on each loss pool's net consumption, net exports, and net virtual transactions. In both cases, SPP determines the total Over-Collected Losses by multiplying these amounts by the non-congestion components of Day-Ahead LMP.

4. For the Day-Ahead market, each day, SPP distributes Over-Collected Losses within each loss pool based on each market participant's share of scheduled net consumption, net exports, Day-Ahead Bilateral Settlement Schedules,[6] and Grandfathered Agreement (GFA) Carve Out Schedules. Subsequently, in the Real-Time market, SPP distributes Over-Collected Losses within each loss pool based on incremental net consumption, incremental net exports,[7] and Real-Time Bilateral Settlement Schedules. Because the distribution within each loss pool is based on each entity's share of withdrawals as described above, the distribution within each loss pool approximates a load-ratio share distribution.

5. Under the current methodology, if the amount of loss revenue collected from market participants in the Day-Ahead market exceeds the amount distributed back to

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[4] SPP defines "loss pool" as: A collection of either (i) Settlement Locations within a Settlement Area (a Settlement Area Loss Pool), or (ii) all External Interfaces and Market Hubs located throughout the Transmission System, that is used for the purpose of determining an Asset Owner's distribution of Over-Collected Losses revenues in Sections 8.5.16 or 8.6.16 of Attachment AE. *See* SPP Tariff, Attachment AE, Section 1.1, Definitions L.

[5] Net virtual transactions are the sum of cleared Virtual Energy Bids and Virtual Energy Offers.

[6] Bilateral Settlement Schedules in SPP are arrangements between two market participants for the transfer of energy or operating reserve obligations that allow for correct accounting of the underlying bilateral contract in the Integrated Marketplace. *See* SPP Tariff, Attachment AE, Sections 8.2, and Addendum 2 to Attachment AE.

[7] Deviations from Day-Ahead schedules in the Real-Time market are considered to be *incremental*. *See* SPP Transmittal at 4 n.9.

market participants, the extra revenue gets distributed as Over-Collected Losses in the Real-Time market. Conversely, if the amount of loss revenue collected in the Day-Ahead market falls short of the amount distributed to market participants, an under collection of losses exists that must be uplifted to the Real-Time market.[8] SPP notes that the SPP Loss Pool, the loss pool that contains hub and Interchange Settlement Locations, includes a large share of transactions that are completely incremental. Because of this, when the Day-Ahead market creates an under collection that is uplifted to the Real-Time market, the SPP Loss Pool is assessed large Over-Collected Losses charges.[9]

II. Notice and Responsive Pleadings

6. Notice of SPP's filing was published in the *Federal Register*, 80 Fed. Reg. 502 (2015), with interventions and protests due on or before January 20, 2015.

7. The following entities filed timely motions to intervene: Westar Energy, Inc.; Sunflower Electric Corporation and Mid-Kansas Electric Company, LLC; South Central MCN, LLC; and Flat Ridge 2 Wind Energy LLC. On January 20, 2015, Xcel Energy Services, Inc. (Xcel) filed a motion to intervene and protest; Tenaska Power Services Co. (Tenaska) filed a motion to intervene and comments; and the Southwest Power Pool Market Monitoring Unit (Market Monitor) filed a motion to intervene and comments. On February 3, 2015, Tenaska filed an answer to Xcel's protest. On February 10, 2015, SPP filed an answer to Xcel's protest. On March 26, 2015, SPP filed an informational letter concerning the timetable for developing system modifications that are necessary to implement its proposal.

III. Discussion

A. Procedural Matters

8. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

9. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2014), prohibits an answer to a protest, unless otherwise ordered by the decisional authority. We accept SPP's and Tenaska's answers because they have provided information that assisted us in our decision-making process.

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[8] *Id.* at 4.

[9] *Id.* at 4-5.

B. Substantive Matters

1. Proposal

10. SPP proposes to eliminate the separate Day-Ahead market and Real-Time market Over-Collected Losses distributions and base Over-Collected Losses distributions on Real-Time market withdrawals. SPP proposes to determine the amount of Real-Time Over-Collected Losses based on the non-congestion components of Real-Time LMP, while the amount of Day-Ahead Over-Collected Losses will still be based on the non-congestion components of Day-Ahead LMP. However, when determining the Over-Collected Losses distribution, SPP now will sum the Over-Collected Losses across the Day-Ahead and Real-Time markets and then distribute the Over-Collected Losses based on Real-Time net consumption, net exports, Day-Ahead and Real-Time market Bilateral Settlement Schedules, and GFA Carve Out Schedules. SPP also proposes to eliminate net virtual transactions from the calculation of each loss pool's share of the Over-Collected Losses amount while still retaining virtual transactions in the calculation of total Over-Collected Losses. SPP asserts that the proposed revisions will correct the unintended consequence of SPP's current methodology, which results in a disproportionate charge to entities transacting primarily in the Real-Time market.[10] SPP further asserts that the proposed revisions will remove a potential disincentive to export or have bilateral transactions at hubs.

2. Comments

11. The Market Monitor believes that the proposed Tariff revisions are an improvement over the current process and requests that the Commission accept them. The Market Monitor explains that the current design results in Real-Time charges to resources that produce less output in the Real-Time market than cleared in the Day-Ahead market, because the distribution treats negative resource deviations as withdrawals. The Market Monitor states that the market charged almost $10 million in Over-Collected Losses at Resource Settlement Locations in nine months.[11] The Market Monitor contends that this additional deviation penalty distorts the incentive for resources to follow their Real-Time market dispatch signal. According to the Market Monitor, SPP's proposed changes will eliminate the Real-Time charges to deviating resources.

12. The Market Monitor states that the current design creates a disincentive to export, especially in Real-Time. The Market Monitor explains that the division of the Over-

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[10] *Id.* at 5.

[11] Market Monitor Comments at 3 and Exh. A.

Collected Losses among loss pools plays a particular role in the distribution to exports, because the interfaces are included in the SPP Loss Pool, a loss pool consisting only of hubs and interfaces. According to the Market Monitor, the total withdrawals in this particular loss pool can be small relative to the amount of Over-Collected Losses charged to the loss pool, with the result that individual transactions may constitute a relatively large share of the Over-Collected Losses.[12]

13. Tenaska urges the Commission to accept SPP's proposed Tariff revisions. Tenaska explains that the Real-Time market is being assessed Over-Collected Losses charges approximately 76 percent of the time. Tenaska argues that these Over-Collected Losses charges can be large[13] and volatile.[14] Tenaska contends that the regularity of such charges conflicts with the Commission's recognition that the use of marginal losses should result in a net revenue surplus to distributed to market participants.[15] Tenaska

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[12] *Id.* at 3-4.

[13] Tenaska states that the current methodology results in an average charge to Real-Time market participants in the SPP Loss Pool of $3.067/MWh. *See* Tenaska Comments at 5-6.

[14] Tenaska notes that the volatility of Real-Time Over-Collected Losses charges as measured by a coefficient of variation is significantly higher than the volatility of uplift charges in most other regional transmission organizations (RTO) and independent system operators (ISO). *See id.* at 6 (citing Staff Analysis of Uplift in RTO and ISO Markets, at 16 n.24 (Aug. 2014) (the "Staff Uplift Analysis"), *available at* http://www.ferc.gov/legal/staff-reports/2014/08-13-14-uplift.pdf, and stating that Commission Staff found that "[d]uring the three-year study period from 2009 through 2011, the average daily uplift charge per MWh was approximately $0.44/MWh in [the California Independent System Operator Corporation (CAISO)], $0.56/MWh in [ISO New England, Inc. (ISO-NE)], $0.36/MWh in [the Midcontinent Independent System Operator, Inc. (MISO)], $1.13/MWh in [the New York Independent System Operator, Inc.], and $0.66/MWh in [PJM Interconnection, L.L.C. (PJM)]."). Moreover, Tenaska states that Commission Staff found that although "[r]eal-time uplift charge rates . . . varied much more widely from day-to-day," and "were generally much higher than day-ahead uplift charge rates," the simple averages of real-time uplift charge rates were $1.23/MWh in MISO, $2.38/MWh in ISO-NE, and $1.57/MWh in PJM. *Id.* (citing Staff Uplift Analysis at 18).

[15] *Id.* at 5 (quoting *Atlantic City Elec. Co. v. PJM Interconnection, L.L.C.*, 115 FERC ¶ 61,132, at P 23 (2006) ("[T]he issue of accounting or crediting arises because billing on the basis of marginal losses (which is the correct marginal price for

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asserts that, because of the high and unpredictable Real-Time Over-Collected Losses charges that have been imposed since the implementation of the Integrated Marketplace, it has been forced to limit its participation in SPP's Real-Time market and/or alter its offer prices to account for the risk of being assessed Real-Time Over-Collected Losses charges.[16]

14. Tenaska notes that the Commission has previously recognized that there is no specific approach that must be used to allocate Over-Collected Losses and has permitted RTOs/ISOs to adopt different distribution methodologies, provided that such methodologies do not provide a direct refund to the entities that paid for the losses in the first instance.[17] Tenaska argues that the revised methodology "provides a method for refunding marginal loss surpluses that avoids making impermissible direct refunds."[18]

15. The Market Monitor and Xcel raise concerns over the inclusion of Bilateral Settlement Schedules in determining the Over-Collected Losses distribution. Xcel contends that, because Bilateral Settlement Schedules have no effect on LMP, they should be excluded from the Over-Collected Losses distribution.[19] Xcel further argues that allocating Over-Collected Losses to Bilateral Settlement Schedules is inappropriate because the Over-Collected Losses distribution is provided to a wholesale customer utilizing a Bilateral Settlement Schedule, i.e., is counted as load, when the seller under the Bilateral Settlement Schedule was the one that bore the cost associated with Over-Collected Losses. The Market Monitor suggests removing Bilateral Settlement

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each customer) results in an over collection by PJM of its actual costs of procuring generation to compensate for line losses"), *on reh'g and compliance filing*, 117 FERC ¶ 61,169 (2006); *Cal. Indep. Sys. Operator Corp.*, 116 FERC ¶ 61,274, at P 93 (2006) (*CAISO*) (the use of marginal losses means that "more revenues will be collected from load than . . . has to [be paid] to generators to cover the losses"), *on clarification & reh'g*, 119 FERC ¶ 61,076 (2007)).

[16] *Id.* at 8.

[17] *Id.* at 8-9 (citing *Sw. Power Pool, Inc.*, 144 FERC ¶ 61,224, at P 156 (2013) (quoting *Northeast Utils. Serv. Co.*, 105 FERC ¶ 61,122, at P 20 (2003))). *See also Black Oak Energy, L.L.C. et al. v. PJM Interconnection, L.L.C.*, 131 FERC ¶ 61,024, at P 33 (2010) ("Any crediting mechanism that does not distort the pricing signals may be acceptable.") (footnote omitted).

[18] *Id.* at 9 (citing *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,050, at P 90 (2014)).

[19] Xcel Protest at 4.

Schedules from the process because Bilateral Settlement Schedules do not result in actual withdrawals from the system. The Market Monitor contends that SPP's proposed revisions will result in Bilateral Settlement Schedules being allocated Over-Collected Losses payments instead of charges.[20]

16. The Market Monitor and Xcel raise further concerns over whether combining the Day-Ahead and Real-Time markets for purposes of Over-Collected Losses distribution will create an incentive to export. Currently, there is a disincentive to export because the SPP Loss Pool, where all import and export transactions are counted, is assessed large Over-Collected Losses charges because these transactions typically do not have Day-Ahead market positions. Both the Market Monitor and Xcel assert that, as a result of the proposal, the SPP Loss Pool could receive excess Over-Collected Losses payments, and, in turn, this would encourage parties to undertake transactions that would otherwise be uneconomic because they can be assured a large share of the Over-Collected Losses payments. Xcel provides an example of a Real-Time export transaction that under the current methodology receives an Over-Collected Losses charge of $2,595, but under the proposed methodology it will receive a $3,302 Over-Collected Losses payment. The Market Monitor recommends that the Commission accept SPP's proposal, but requests that the Commission require SPP either to remove exports from the distribution or remove the loss pools entirely and distribute Over-Collected Losses based on payment for transmission service.[21] Xcel argues that the Commission should reject the filing without prejudice and recommends that SPP cap the Over-Collected Losses allocated to firm exports and eliminate the distribution to non-firm exports.[22]

3. <u>Answers</u>

17. Tenaska argues that the Commission has made clear that a variety of methodologies may be used to allocate marginal loss surpluses, and RTOs and ISOs have the authority to implement different distribution methodologies.[23] Tenaska notes that the

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[20] Market Monitor Comments at 4.

[21] *Id.* at 5.

[22] Xcel Protest at 4-5 (citing *Black Oak Energy, LLC v. PJM Interconnection, L.L.C.*, 128 FERC ¶ 61,262 (2009)).

[23] Tenaska Answer at 4 (citing Tenaska Comments at 8-9 & n.31 (citing *Sw. Power Pool, Inc.*, 144 FERC ¶ 61,224 at P 156; *Northeast Utils. Serv. Co.*, 105 FERC ¶ 61,122 at P 20; *Black Oak Energy, L.L.C., et al. v. PJM Interconnection, L.L.C.*, 131 FERC ¶ 61,024 at P 33)).

Commission has imposed only two limitations on marginal loss distribution methodologies. First, the distribution methodology may not provide a direct refund for marginal losses – i.e., the methodology cannot "refund[] surplus losses to individual Market Participants in proportion to their contribution to the surplus" because this would "diminish[] the price signal provided by marginal loss pricing."[24] Second, while "any crediting mechanism that does not distort the pricing signals may be acceptable," such methodology must be applied "on a not unduly discriminatory basis."[25] Tenaska states that the Commission previously found that SPP's existing distribution methodology complies with its requirements.[26] Tenaska contends that the same is true with the new methodology proposed by SPP because, as with the existing methodology, distributions will continue to be made within the loss pools based on a load-ratio share basis, so that there are no direct refunds or concerns regarding undue discrimination.[27]

18. Tenaska claims that Xcel does not allege, much less demonstrate, that the distribution methodology proposed in SPP's filing fails to satisfy the Commission's requirements. Tenaska argues that it is a common practice among RTOs/ISOs to net Day-Ahead and Real-Time losses, and to provide a single charge/payment for marginal losses.[28] Furthermore, Tenaska states that SPP's proposal to allocate the combined Over-Collected Losses amount to Real-Time withdrawals, rather than Day-Ahead schedules, is consistent with the Commission's order addressing the distribution methodology proposed by CAISO.[29] Tenaska asserts that the revised methodology will result in Over-

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[24] *Id.* at 5 (citing *Sw. Power Pool, Inc.*, 141 FERC ¶ 61,048 at P 211 (footnotes omitted)).

[25] *Id.* (citing *Black Oak Energy, L.L.C. v. PJM Interconnection, L.L.C.*, 139 FERC ¶ 61,111, at P 4 (2012) (footnote omitted)).

[26] *Id.* (citing *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,050 at PP 86-91).

[27] *Id.* (citing SPP Transmittal at 5).

[28] *Id.* (citing Midcontinent Independent System Operator, Inc., Open Access Transmission, Energy and Operating Reserve Markets Tariff, § 40.6; PJM Interconnection, L.L.C., Open Access Transmission Tariff, Attachment K – Appendix, § 5.5; California Independent System Operator Corporation, Fifth Replacement Tariff, § 11.2.1.6).

[29] *Id.* at 5-6 (quoting *CAISO*, 116 FERC ¶ 61,274 at P 96 ("[A]llocating the over-collection based upon day-ahead schedules would create an improper incentive for market participants to engage in day-ahead bidding and self-scheduling practices designed to maximize payments for excess marginal loss charges")); *id.* at 6 (quoting

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Collected Losses charges rarely being assessed to any market participants and that this will allow the methodology to more closely reflect the Commission's intent for the use of marginal losses to result in surpluses that are refunded.[30]

19. Tenaska argues that the Commission should reject Xcel's concerns that the new distribution methodology will increase Over-Collected Losses payments to Bilateral Settlement Schedules and exports while reducing payments to load. According to Tenaska, the Commission has made clear that "no party is entitled to receive any particular amounts through disbursement of the surplus that inevitable results from the marginal loss method, since the price each party is paying is the correct marginal price for the energy that each party is purchasing."[31]

20. Tenaska argues that while it may be possible to improve upon the proposed methodology, the Commission should accept the filing because of the urgent need to correct the flows in the existing methodology and, to the extent necessary, direct SPP and its stakeholders to engage in further discussions to explore additional improvements to the Over-Collected Losses refund methodology.[32]

21. SPP disagrees with Xcel's speculation that SPP's proposed Tariff changes could create an inefficient incentive to export.[33] SPP states that, while it is true that SPP's netting proposal will significantly affect the distribution of Over-Collected Losses between the Day-Ahead and Real-Time markets, that is precisely the point of the changes. SPP observes that, under the current design, market participants have an economic incentive to over-participate in the Day-Ahead market and under-participate in the Real-Time market, which disproportionately burdens Real-Time market participants

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CAISO, 116 FERC ¶ 61,274 at P 67 (accepting proposal to allocate the over-collections based on "the total MWh of load (internal demand plus exports) to determine a per-MWh refund amount of the over-collection for the period of each settlement statement.")).

[30] *Id.* at 7 (citing Calculated OCL Rates through July 28th.xlsx, *available at* https://marketplace.spp.org/web/guest/reports).

[31] *Id.* at 9 (citing *Black Oak Energy, L.L.C. v. PJM Interconnection, L.L.C.*, 139 FERC ¶ 61,111 at P 3; *CAISO*, 116 FERC ¶ 61,274 at P 94; *Atlantic City Elec. Co., et al. v. PJM Interconnection, L.L.C.*, 115 FERC ¶ 61,132 at P 24).

[32] *Id.* at 12 (citing SPP Transmittal at 2-3).

[33] SPP Answer at 6 (citing Xcel Protest at 5).

who hold no Day-Ahead positions.[34] SPP states that its proposal reflects a more balanced approach that will mitigate the artificial incentives of the current design, and the economic consequences of losses will be spread uniformly across actual Real-Time withdrawals in a manner that treats all loads and exports comparably.

22. SPP states that its proposal removes virtual transactions from the loss pool distribution calculation, in recognition that Day-Ahead virtual offers at Hub Settlement Locations serve to inflate the Real-Time distribution of Over-Collected Losses to the SPP Loss Pool. SPP claims that by removing virtual transactions, the distribution of Over-Collected Losses to the SPP Loss Pool is reduced, thus reducing the charge or payment for Over-Collected Losses distribution to export transactions, in turn reducing the large swing from Over-Collected Losses charges to Over-Collected Losses payments to the SPP Loss Pool.

23. SPP notes that pseudo-tie transactions are limited to participation in the Real-Time market and that Day-Ahead export schedules, if not cancelled or curtailed, flow into Real-Time export schedules. SPP contends that its proposal permits exporters to maintain the option of avoiding the volatility of Real-Time prices by scheduling their exports in the Day-Ahead market, while at the same time relieving them of the burden of making up any deficiency in losses for energy cleared in the Day-Ahead market if they choose to export in Real-Time without a Day-Ahead schedule. SPP argues that the proposal to net Day-Ahead and Real-Time Over-Collected Losses reduces the burden of deviations on transactions out of SPP that either cannot or have no other reason to participate in the Day-Ahead market (other than to avoid a larger distribution of Over-Collected Losses charges to the SPP Loss Pool).

4. SPP Informational Letter

24. In its informational letter, SPP explains that the development of the system modifications necessary to implement the revised Over-Collected Losses methodology is behind schedule, and the necessary software changes will not be deployed by the April 1, 2015 requested effective date. Instead, the software will be deployed by the end of May 2015. Nonetheless, SPP requests that the Commission approve the requested effective date of April 1, 2015. According to SPP, once the software has been deployed, SPP's existing settlement process will allow SPP to reflect the Over-Collected Losses methodology in final settlement statements and resettlement statements, as applicable,

[34] *Id.* at 7 (noting that "SPP compiled data for the first seven months of operations under the Integrated Marketplace and observed that in every month, cleared Day-Ahead load exceeded actual Real-Time load, with monthly variations ranging from a low of approximately 1% to a high of nearly 5%.").

back to the April 1, 2015 effective date. SPP further explains that it expects that each operating day will be settled or resettled using the new methodology by the end of July 2015 or sooner. SPP argues that the reasons that led SPP to submit its initial filing – i.e., correcting the unintended consequence in the current methodology that disproportionately affects certain market participants -- militate in favor of retaining the requested April 1, 2015 effective date. SPP states that it will update the Commission, as appropriate, with any developments related to the planned implementation of the revised Over-Collected Losses methodology.

5. Commission Determination

25. We conditionally accept SPP's proposed changes to its Over-Collected Losses refund mechanism, to become effective April 1, 2015, subject to a compliance filing ordered below. We find that SPP's proposal addresses an unintended consequence of its refund methodology, and is otherwise just and reasonable, not unduly discriminatory or preferential. We also encourage SPP to continue to engage with stakeholders to explore further improvements. Specifically, we encourage SPP to continue to monitor the distribution of Over-Collected Losses going forward for evidence of improper incentives and file further tariff changes if appropriate.

26. We disagree with the Market Monitor's and Xcel's arguments that Bilateral Settlement Schedules, exports, or pseudo-ties must be removed from the distribution. The Commission has accepted refund mechanisms where they do not pay refunds in direct proportion to losses and are not applied on an unduly discriminatory basis.[35] Allocating Over-Collected Losses payments (and charges) to these transactions does not violate either of these rules. This determination is, however, without prejudice to SPP proposing further improvements to its methodology. Further, we find that the concerns raised by Xcel and the Market Monitor regarding an improper incentive to export are speculative and unsupported at this time. Xcel's hypothetical example simply shows an export transaction that was previously being assessed large loss charges is now being granted an Over-Collected Losses payment. The purpose of SPP's proposal is to correct the very inequitable result that Xcel's example illustrates. Just because exports in the Real-Time market will now more likely receive Over-Collected Losses payments instead of charges does not imply that there will be an inefficient or improper incentive to export.

27. However, we note that SPP's formulae for determining the quantity of Over-Collected Losses in proposed sections 8.6.16.2(a) and 8.6.16.2(b) appear to be in error. Specifically, it appears that the formulae fail to net the generation and load at the settlement location. We therefore direct SPP to correct these formulae or explain why it

[35] *See, e.g.*, *Northeast Utils. Serv. Co.*, 105 FERC ¶ 61,122 at P 20.

should not be required to do so, in a compliance filing due within 30 days of the date of this order.

The Commission orders:

(A) SPP's proposed Tariff revisions are hereby conditionally accepted for filing, to become effective April 1, 2015, as discussed in the body of this order.

(B) SPP is hereby directed to make a compliance filing within 30 days of the date of this order, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.