129 FERC ¶ 61,260
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Suedeen G. Kelly, Marc Spitzer,
and Philip D. Moeller.

Entergy Services, Inc. Docket Nos. ER09-1180-000
ER09-1180-001
ER09-1180-002
ER09-1180-003

ORDER ACCEPTING
PROPOSED TARIFF SHEETS

(Issued December 18, 2009)

1. On May 5, 2009, in Docket No. ER09-1180-000, Entergy Services, Inc. (Entergy), on behalf of the Entergy Operating Companies,[1] submitted revisions to Entergy's Available Flowgate Capability (AFC) manual, which is Attachment C to Entergy's Open Access Transmission Tariff (OATT). In this order, we accept Entergy's proposed tariff sheets, effective September 28, 2009.

I. Summary of Filings

2. On May 5, 2009, Entergy submitted revisions to Attachment C to its OATT (May 5 Filing). Entergy explains that its current AFC process uses OASIS Automation, an Areva software product, when calculating AFC values and evaluating transmission service requests. The proposed tariff revisions reflect Entergy's transition to software developed by OATi for the calculation of AFC values and the evaluation of transmission service available for Entergy's Operating, Planning, and Study Horizons. Specifically, Entergy states that it has revised sections 3.5 (Resynchronization of AFC Values) and 5.2 (Updating Response Factors) to describe: (1) the process by which AFC data will be

[1] The Entergy Operating Companies are Entergy Arkansas, Inc., Entergy Gulf States Louisiana, LLC, Entergy Louisiana, LLC, Entergy Mississippi, Inc., Entergy New Orleans, Inc., and Entergy Texas, Inc.

transferred between the various software used to calculate AFC, namely RFCalc[2] and webTrans[3]; and (2) the process of resynchronizing the RFCalc and AFC values.

3. Entergy explains that under the current process, servers housing RFCalc and OASIS Automation are currently directly interfaced, so that AFC data inputs, such as Response Factors, are automatically resynchronized to OASIS Automation from RFCalc. Under the proposed changes, Entergy states, the two servers will not have such a direct and automatic interface. Instead, Entergy states that AFC data inputs will need to be transferred between the two servers that are connected via a communication line and are located several states apart. The transfer will occur from Pine Bluff, Arkansas (Entergy's System Operator Center) to Minneapolis, Minnesota (OATi's headquarters). Entergy notes that while it does not anticipate delays during the transfer, such delays might occur, and they could affect the resynchronization intervals currently delineated in sections 3.5 and 5.2 of Attachment C. Entergy also notes that now AFC data will be archived before being transmitted to webTrans. Entergy further states that this may contribute to a potential delay and explains that, to the extent a scheduled resynchronization cannot occur, the last valid resynchronized data is used to evaluate transmission service requests.

4. On May 28, 2009, Entergy filed, in Docket No. ER09-1180-001, a request for a deferred effective date. Entergy explained that, while Entergy and the Independent Coordinator of Transmission (ICT) have been working diligently to prepare for the transition, it believes that additional time is required to test the new OATi software for compliance with regulatory and other requirements and to provide necessary training for

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[2] RFCalc is responsible for creating Entergy's transmission network models, which are based primarily on generation data, load forecasts, outage schedules, and transmission reservation data. RFCalc utilizes these models to calculate baseflows and Response Factors that are monitored for each transfer path for each time point in the applicable horizon. Response Factors measure the impact that each source-to-sink transaction has on a monitored flowgate.

[3] webTrans uses data generated by RFCalc to process transmission service requests that have been submitted through webOASIS for service requested in the operating and planning horizons. Every time a transmission service request is submitted or modified through webOASIS, webTrans instantaneously evaluates AFC for affected flowgates and algebraically adjusts AFC as necessary. Entergy notes that in the event a resynchronization is missed, webTrans will use the existing data created by RFCalc to process the request. Entergy explains that Entergy's AFC process continues to instantaneously adjust AFC values across impacted flowgates as TSRs are submitted or modified through OASIS. Entergy also adds that even if a resynchronization is missed, RFCalc continues to create data to be used during the next resynchronization.

Entergy, the ICT and Entergy stakeholders. On August 18, 2009, Entergy filed, in Docket No. ER09-1180-002, revised tariff sheets requesting an effective date of September 28, 2009 (August 18 Filing).

5. In a letter issued on October 6, 2009, Commission staff requested Entergy to provide additional information. Specifically, the Commission asked Entergy to provide information regarding the cause and effects of the resynchronization delays and potential software modifications to notify the customers of such delays. On October 21, 2009, Entergy filed a response to the deficiency letter (Entergy Response).

II. Notice of Filing and Responsive Pleadings

6. Notice of Entergy's May 5 Filing was published in the *Federal Register*, 74 FR 27784 (2009), with interventions and protests due on or before June 18, 2009. Notice of Entergy's August 18 Filing was published in the *Federal Register*, 74 FR 45192 (2009), with interventions and protests due on or before September 14, 2009. Union Power Partners, L.P., (Union Power) filed a timely motion to intervene and protest. Entergy filed an answer. Notice of the Entergy Response was published in the *Federal Register*, 74 FR 56603 (2009), with comments, protests and interventions due on or before November 12, 2009. None were filed.

7. Union Power states in its protest that the proposed tariff revisions addressing resynchronization in sections 3.5 and 5.2 are insufficiently detailed and must be modified. Union Power contends that Entergy's proposal presents two issues with respect to resynchronization. The first, Union Power argues, is a change in the automated resynchronization process as a result of the transition to webTrans. The second, Union Power adds, is a lack of transparency with respect to delayed resynchronizations. As a result, and to satisfy the transparency requirements of Order No. 890, Union Power contends that the Commission should require Entergy to: (1) clarify the new resynchronization process between RFCalc and webTrans; and (2) post information related to delayed resynchronizations.

8. With respect to the resynchronization process, Union Power states that Entergy is silent as to how the resynchronization of values between RFCalc and webTrans will take place. Union Power also asserts that Entergy does not address why an automated process is not possible, as occurred previously. Moreover, Union Power contends that Entergy's resynchronization process lacks the transparency required in Order No. 890.[4]

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[4] *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009).

Union Power requests that the Commission require Entergy to include in its Tariff a mechanism by which AFC and Response Factor values will be transferred between RFCalc and OATi.

9. With respect to its concern about potential resynchronization delays, Union Power states that Entergy does not: (1) identify the circumstances under which a delayed resynchronization could occur other than related to the archiving of data; or (2) propose a process for notifying eligible customers of resynchronization delays and their bases. According to Union Power, as proposed, sections 3.5 and 5.2 do not satisfy the transparency requirements of Order No. 890. Union Power argues that Entergy should be required to revise its Attachment C to state that it will post when delays in resynchronizations occur and state the reasons for the delays, within one hour of the delay.

10. Entergy responds that Union Power may have misconstrued the resynchronization process that will be used once webTrans becomes effective. Currently, Entergy explains, the servers containing RFCalc and OASIS Automation are both physically located in Entergy's System Operator Center in Pine Bluff, Arkansas and are physically networked. However, under the new system, the server housing webTrans will be located in OATi's headquarters in Minneapolis, Minnesota. Once webTrans is implemented, Entergy states that RFCalc will create a file that will automatically be transmitted over a secured connection from the server located at Entergy's center to the webTrans server at OATi's center to enable webTrans to evaluate transmission service requests.

11. With respect to Union Power's issue regarding delays in the resynchronization process, Entergy states that the Commission should deny Union Power's request to post information on OASIS. Entergy argues that Union Power is seeking to impose an AFC-related obligation on Entergy that is not required by the Commission's regulations or any current or pending North American Electric Reliability Corporation (NERC) standard.

12. Entergy asserts that Order No. 890 did not require that transmission providers revise their existing AFC methodologies to describe their resynchronization practices, nor did it, in any way, require transmission providers to post notices of delays in resynchronizations or the reason for the delay. Entergy also maintains that no transparency in the AFC process is lost if a posting is not required for delayed resynchronizations. Entergy states that the information used by the AFC process to evaluate transmission service requests is still fully available for review by Union Power and any other customer. Further, Entergy argues that Union Power's position should also be rejected because it does not provide customers any real benefit when compared to the costs of the necessary software modifications. Modifications to the software to include the posting mechanism sought by Union Power could require expensive and time-consuming software upgrades, and could delay the implementation of webTrans. Accordingly, Entergy asserts that the Commission should deny Union Power's protest.

III. Deficiency Response

13. Entergy explains that during the RFCalc resynchronization, the RFCalc software re-performs the powerflow solution on the network models for Entergy's transmission system to balance generation and load. After the updated RFCalc resynchronization output is received by webTrans, the webTrans resynchronization begins to update the AFC values. Entergy further notes that delays in this process may occur because of, among other things, hardware failures, software failures, network issues, input data errors, planned maintenance, and data archival delays.

14. Entergy also explains that the length of these delays depends entirely upon the cause of the delay, and therefore, could range from a second (in the case of a minor software failure) to hours (in the event of a hardware failure such as a physical cut in the secured connection between the RFCalc and webTrans servers). However, Entergy clarifies that delays in the resynchronization will not impact eligible transmission customers seeking to submit or modify a transmission service request. In other words, Entergy states that the fact that webTrans instantaneously adjusts AFCs over impacted flowgates using the most recent data means that transmission service requests are evaluated with the most up-to-date AFC data regardless of whether a resynchronization is delayed. Accordingly, Entergy states that there is no loss in transparency when a resynchronization is delayed, and the evaluation and processing of transmission service requests is not impacted by delayed resynchronizations. Entergy states that transmission customers are aware of the frequency of the resynchronizations, as observed by time stamps of the data posting, and as such, transmission customers can relatively easily ascertain any delays in resynchronization. Lastly, Entergy notes that Union Power's requested changes would require software development that costs between $200,000 and $300,000 because of the new interfaces that would be required between the software applications.

IV. Discussion

A. Procedural Matters

15. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2009), Union Power's timely, unopposed motion to intervene serves to make it a party to this proceeding.

16. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2009), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We will accept Entergy's answer because it has provided information that assisted us in our decision-making process.

B. Substantive Matters

17. We will accept Entergy's proposed tariff sheets, effective September 28, 2009, as requested, as discussed further below. In response to staff's deficiency letter, as well as to Union Power's protest, Entergy clarified its proposal and explained in more detail how it will synchronize data between RFCalc and webTrans, as well as explained the possible causes of delays. As Entergy explains, webTrans will not have the same type of direct server interface with RFCalc as OASIS Automation. Instead, Entergy explains, AFC values and Response Factor values will need to be transferred between the RFCalc (located in Arkansas) and webTrans (located in Minnesota) servers. This transfer will be automatic, not manual, and will occur over a secured connection between the servers so that webTrans can evaluate the transmission service requests.[5]

18. With respect to Union Power's concerns regarding these delays in the resynchronization process, we agree with Entergy that there is no Commission regulation or NERC standard that requires transmission providers to describe the process by which data is transferred between the different software applications used in calculating AFC values or in evaluating transmission service requests.[6] Indeed, Union Power has pointed to no rule or regulation that would require Entergy to provide such information concerning possible delays. Further, we disagree with Union Power that Order No. 890's ATC/AFC transparency principles support its request that Entergy post notices of delays in resynchronizations or the reasons for the delays. We find that no transparency in the AFC process is lost if a posting is not required for delayed resynchronizations. Union Power and any other customer will still have access to the information used in the AFC process and will be able to evaluate the processing of all transmission service requests.[7] Accordingly, we find that Union Power's concerns regarding resynchronization delays do not warrant the relief it requests.

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[5] Entergy Response at 1-6; Entergy Answer at 4.

[6] Entergy Answer at 6.

[7] Entergy Answer at 6-7. Entergy Response at 7 ("Delays in the resynchronization of AFC values will not impact eligible customers seeking to submit or modify T[ransmission] S[service] R[equest]s [TSR], nor will they impact an eligible customer in the process of submitting or modifying a TSR through OASIS. As explained above, regardless of whether a resynchronization is delayed, webTrans instantaneously adjusts AFCs as necessary over impacted flowgates as TSRs are submitted or modified through OASIS"). Because there is no loss of transparency, we agree with Entergy that Union Power's notice request is not cost or resource justified.

The Commission orders:

Entergy's proposal is hereby accepted, effective September 28, 2009, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.