

134 FERC ¶ 61,268
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
John R. Norris, and Cheryl A. LaFleur.

Southwest Power Pool, Inc.

Docket Nos. ER10-941-002,
ER10-941-003

ORDER ON REHEARING AND COMPLIANCE

(Issued March 31, 2011)

1. On March 26, 2010, as amended on April 16, 2010, Southwest Power Pool, Inc. (SPP) filed an executed Letter Agreement Regarding a Comprehensive Seams Agreement between Entergy Services, Inc. (Entergy) and SPP with four attached protocols (collectively, Seams Agreement) pursuant to section 205 of the Federal Power Act (FPA).¹ On June 15, 2010, the Commission conditionally accepted the Seams Agreement to be effective March 31, 2010, subject to SPP submitting a compliance filing within 30 days making certain revisions to the Seams Agreement.² East Texas Electric Cooperative, Inc., Northeast Texas Electric Cooperative, Inc., Sam Rayburn G&T Electric Cooperative, Inc., and Tex-La Electric Cooperative of Texas, Inc. (collectively, East Texas Cooperatives) filed a request for rehearing of the June 15, Order. On July 15, 2010, SPP submitted a compliance filing. East Texas Cooperatives filed a protest to SPP's compliance filing. In this order we grant in part and deny in part East Texas Cooperatives' request for rehearing of the June 15 Order and accept SPP's compliance filing, and we require SPP to make a further compliance filing within 30 days of the date of this order.

I. Background

2. In a rehearing order on Entergy's Independent Coordinator of Transmission (ICT) proposal, the Commission encouraged Entergy and SPP to negotiate and execute a seams agreement to enhance coordination between the two transmission systems.³ Beginning in

¹ 16 U.S.C. § 824d (2006).

² *Southwest Power Pool, Inc.*, 131 FERC ¶ 61,236 (2010) (June 15 Order).

³ *Entergy Services, Inc.*, 116 FERC ¶ 61,275, at P 73 (2006).

2009, the Arkansas Public Service Commission (Arkansas Commission) directed SPP and Entergy to negotiate and execute a seams agreement.⁴

3. On March 26, 2010, as amended on April 16, 2010, SPP filed the Seams Agreement, consisting of the Letter Agreement and four attached Protocols: (1) Protocol Governing Coordination of Enhanced Regional Planning Activities, Study Coordination Activities, and Flowgate Financial Rights (Coordination Protocol); (2) Protocol Governing Coordination of AFC/TFC [Available Flowgate Capability/Total Flowgate Capability] Values (AFC/TFC Protocol); (3) Protocol Governing Allocation of Costs of Upgrades (Cost Allocation Protocol) and (4) Protocol Governing Data Exchange, Confidential Information, and Critical Energy Infrastructure Information (Information Protocol). In addition, the Letter Agreement provided that additional protocols may be developed and will be incorporated into the Letter Agreement as attachments when and if executed by the parties.⁵

4. In the June 15 Order, the Commission conditionally accepted the Seams Agreement, subject to SPP revising certain provisions in the AFC/TFC Protocol and the Coordination Protocol.

5. Specifically, the Commission directed SPP to revise a provision in the AFC/TFC Protocol that stated that the parties will incorporate transmission network changes and adjacent transmission providers' changes in their models "if the changes are applicable."⁶ The Commission found that this provision needed to be revised in order to clarify which changes would be considered "applicable."⁷ Similarly, the Commission also directed SPP to clarify a provision that stated that the parties will institute a process for incorporating adjacent transmission providers' significant changes in their models if

⁴ Order No. 22, Docket No. 08-136-U, at 3 (Arkansas Public Service Commission Feb. 11, 2010) (ordering SPP and Entergy to file a Seams Agreement reflecting whatever issues have been agreed upon and to provide a detailed status report regarding the process to date on all remaining issues and what needs to be done to complete work on these issues.); Order No. 10, Docket No. 08-136-U, at 19-20 (Arkansas Public Service Commission May 29, 2009); Order No. 15, Docket No. 08-136-U, at 1 (Arkansas Public Service Commission Aug. 18, 2009).

⁵ Letter Agreement at 1.

⁶ AFC/TFC Protocol, "Data Exchange," Section 3.d.i.

⁷ June 15 Order at P 41.

inclusion is “appropriate and feasible.”⁸ The Commission directed SPP to define the term “appropriate and feasible.”⁹

6. The Commission also directed SPP to revise a provision in the Coordination Protocol that set out three alternative circumstances under which Entergy will incorporate identified facilities into its models for evaluating transmission service requests.¹⁰ The Commission stated that the revisions must clarify how Entergy will determine which of the three circumstances would apply in a given situation.¹¹ The Commission directed SPP to revise a provision titled “Granting of Flowgate Financial Rights to SPP,” in order to explain the conditions under which SPP (as opposed to SPP’s customers) would be granted flowgate financial rights.¹²

7. On July 15, 2010, East Texas Cooperatives filed a request for rehearing of the June 15 Order. East Texas Cooperatives assert that the Commission should have required certain modifications to the AFC/TFC Protocol requested by East Texas Cooperatives. Specifically, East Texas Cooperatives request rehearing of the Commission’s rejection of the following modifications sought by East Texas Cooperatives: (1) a provision governing generator status should be clarified to state exactly which generators are included, and specifically to state whether generators are included that are also included in separate balancing authorities embedded within the Entergy system, as these are “indirectly” interconnected; (2) a provision stating that the parties will initially exchange configuration and generation changes through the North American Electric Reliability Corporation (NERC) Multi-regional Modeling Working Group should be modified to provide for more frequent exchanges; (3) a provision governing the parties’ exchange of unit commitments or orders of dispatch should be modified to expressly state that the exchange will include dispatch data from Entergy’s Participating Network Customer User Interface (PNCUI); (4) a provision describing parties’ incorporation of counterflows should be modified to require that the percentage of counterflows allotted to each flowgate be the same for the two regions; (5) a provision should be inserted in the

⁸ AFC/TFC Protocol, “Data Exchange,” Section 3.d.ii.

⁹ June 15 Order at P 41.

¹⁰ As noted above, Section 2 of “Coordination of Transmission Service Request and Interconnection Request Study Processes,” states that Entergy will include the facilities on the SPP system in its models when they are in-service, have received Notification to Construct, or are other SPP customer-committed projects.

¹¹ June 15 Order, 131 FERC ¶ 61,236 at P 25.

¹² *Id.*

AFC/TFC Protocol stating that the parties will make available to transmission customers their lists of reservations excluded from the AFC calculations; and (6) the AFC/TFC Protocol should be modified to address the coordination of ATC values and divergent ATC values at the same interface.¹³

8. On July 15, 2010, SPP filed proposed revisions to the Seams Agreement, which are described below and which SPP intended to comply with the June 15 Order.

II. Notice of Filings and Responsive Pleading

9. Notice of SPP's July 15, 2010 filing was published in the *Federal Register*, 75 Fed. Reg. 43961 (2010), with interventions or protests due on or before August 3, 2010. East Texas Cooperatives filed a protest.

III. Discussion

1. East Texas Cooperatives' Request for Rehearing

a. AFC/TFC Protocol, Data Exchange, Section 3.a.ii

10. East Texas Cooperatives contend that section 3.a.ii in the AFC/TFC Protocol, the provision governing the exchange of generator status information, is ambiguous regarding whether it encompasses generators that are also included in separate balancing authorities embedded within the Entergy or SPP transmission system.¹⁴ East Texas Cooperatives assert that such generators in embedded balancing authorities could be seen as "indirectly" interconnected to the relevant transmission system and therefore could be excluded from AFC or TFC calculations. East Texas Cooperatives contend that, because the June 15 Order does not resolve this ambiguity, the Commission should require that the provision be revised to address whether the term "directly interconnected generators" includes such generators.¹⁵

Commission Determination

11. We grant rehearing to direct further clarification of section 3.a.ii. We agree with East Texas Cooperatives that section 3.a.ii is ambiguous as to whether the term "directly interconnected generators" includes generators in balancing authorities embedded in the Entergy or SPP transmission system. Accordingly, we direct SPP to file, within 30 days

¹³ East Texas Cooperatives' Request for Rehearing at 1-2.

¹⁴ *Id.* at 4-5.

¹⁵ *Id.*

of the date of this order, revisions to section 3.a.ii to clarify whether “directly interconnected generators” includes generators in balancing authorities embedded in the Entergy or SPP system.

b. AFC/TFC Protocol, Data Exchange, Section 3.d

12. East Texas Cooperatives request rehearing of the Commission’s acceptance of AFC/TFC Protocol section 3.d, which requires that the parties will initially exchange configuration and generation changes through the NERC Multi-regional Modeling Working Group. East Texas Cooperatives assert that this exchange may not be frequent enough because the NERC Multi-regional Modeling Working Group is an annual process and might not take into account significant topology changes that occur between updates.¹⁶ East Texas Cooperatives urge that the Commission require a more frequent reporting process.¹⁷

13. East Texas Cooperatives argue that the Commission’s interpretation of the provision’s subparts is erroneous. According to East Texas Cooperatives, the Commission interpreted this provision to mean that the parties would first exchange information through the NERC Multi-regional Modeling Working Group process and subsequently develop a new data exchange process that would ultimately supplant the annual NERC process.¹⁸ East Texas Cooperatives disagree with this interpretation, contending that the provision states that the NERC Multi-regional Modeling Working Group provision will remain, and the parties will develop a process by which the exchanged data will be incorporated into each party’s TFC or AFC calculation models. Consequently, under East Texas Cooperatives’ interpretation, the annual NERC Multi-regional Modeling Working Group process would be the only vehicle for data exchange, and the incorporation process, which would follow the NERC Multi-regional Modeling Working Group, would also be conducted annually. East Texas Cooperatives also argue that the Commission’s failure to address this issue is inconsistent with other directives in the July 15 Order, which required SPP to clarify other language found by the Commission to be vague.¹⁹

¹⁶ *Id.* at 6.

¹⁷ *Id.* at 7-8.

¹⁸ *Id.* at 5-6.

¹⁹ *Id.* at 6-7.

Commission Determination

14. We grant rehearing and direct that SPP provide clarification of section 3.d. This section is unclear as to the timing and frequency of the communication of transmission configuration changes and generation additions. Section 3.d states, in relevant part:²⁰

3.d. Each party initially shall communicate transmission configuration changes and generation additions or retirements to the other Party through the NERC MMWG process.

i. As soon as reasonably practicable, each Party shall update its models used to calculate TFC or AFC with such changes and additions that occur to the transmission network. . . . This data exchange shall occur no less often than prior to May 15th of each year this Protocol is effective.

ii. Within ninety (90) days after the Effective Date of this Protocol, the Parties shall institute a process designed to update each Party's TFC and AFC models with all such significant changes and additions of an adjacent Transmission Provider.

The word "initially" could mean at the start of the Protocol, as the Commission interpreted it in the June 15 Order; however, as East Texas Cooperatives point out, it could also mean at the start of each calendar year. Therefore, we direct SPP to file, within 30 days of the date of this order, revisions to section 3.d to specify clearly the timing and frequency of this data exchange. In addition, if SPP and Entergy intend to limit the data exchange to once a year, then we direct SPP to include in its transmittal letter an explanation of why updating the models annually is sufficient to ensure accurate models.

c. AFC/TFC Protocol, Data Exchange, Section 5.a

15. East Texas Cooperatives request rehearing of the Commission's rejection of their request for revisions to section 5.a, the provision requiring each party to exchange unit commitments or orders of dispatch. East Texas Cooperatives argue that the provision must be clarified to ensure that the exchange includes the dispatch data provided by Entergy's PNCUI.²¹ East Texas Cooperatives state that the PNCUI assumes a dispatch in

²⁰ The quoted provision is revised section 3.d as proposed in SPP's July 15, 2010 Compliance Filing. The revisions do not change the substance of the language relevant to the issue here.

²¹ PNCUI is part of Entergy's Weekly Procurement Process (as discussed below).

the short-term models, and therefore the parties must ensure that their use of exchanged data is consistent and relies on a thorough understanding of how the data were derived.²²

Commission Determination

16. We deny East Texas Cooperatives' request for rehearing. Section 5.a states that the parties will exchange generation unit commitments or orders of dispatch, including for all designated network resources and other resources that are committed or have the legal obligation to run.²³

17. Contrary to East Texas Cooperatives' claim, in the June 15 Order the Commission did not leave it to the discretion of the parties to decide whether to include the PNCUI data. Instead, the Commission left it to the parties to determine whether the PNCUI data meet section 5.a's description of what is to be included. However, on further examination, we find that PNCUI data are not the type of data required to be exchanged under section 5.a. Entergy's Weekly Procurement Process Manual (posted on the ICT's section of the SPP website) defines PNCUI as:

An internet based user interface used by a WPP Participant to enter offer and cost information on existing generating resources and Third Party Offers, as well as other data for the WPP.

According to this definition and the section of the Weekly Procurement Process Manual devoted to PNCUI,²⁴ PNCUI data are entered by Weekly Procurement Process participants, and they include offer and cost information on existing generating resources and third party offers. Data that are entered by participants and include costs and offers are "inputs" to the Weekly Procurement Process. In contrast, section 5.a of the AFC/TFC Protocol requires the parties to exchange "unit commitments and orders of dispatch, including network resources and other resources that are committed or have the legal obligation to run." These appear to be "outputs" of a transmission provider's evaluation process (such as the Weekly Procurement Process). Because PNCUI data are inputs, whereas the data to be exchanged under section 5.a are outputs, we conclude that PNCUI data are not the type of data that SPP and Entergy are required to exchange under section 5.a. Therefore, we deny East Texas Cooperatives' request that the provision be clarified.

²² East Texas Cooperatives' Request for Rehearing at 8.

²³ AFC/TFC Protocol, "Data Exchange," section 5.a.

²⁴ Weekly Procurement Process Manual, Section 4, "Participating Network Customer User Interface & Other WPP [Weekly Procurement Process] Inputs," *available at* <http://www.spp.org/publications/WPPManual%20032309%20Clean.pdf>.

d. AFC/TFC Protocol, Data Exchange, Section 6.c

18. East Texas Cooperatives also question the Commission's acceptance of the AFC/TFC Protocol provision requiring each party to implement practices and procedures for modeling reservations and incorporating counterflows created by reservations in electrically opposite directions.²⁵ East Texas Cooperatives request that this provision be clarified to provide that the percentage of counterflows allotted to each flowgate be the same for the two regions.²⁶

Commission Determination

19. We deny East Texas Cooperatives' request for rehearing. As we stated in the June 15 Order, each party's treatment of counterflows is set out in its OATT.²⁷ As East Texas Cooperatives note, the parties' treatments of counterflows do differ in certain respects.²⁸ Requiring the parties to make their "allotments" of counterflows the same for each flowgate would require them either to revise their OATTs or to treat counterflows differently from the manner in which counterflows are to be treated under their respective OATTs. Therefore, we will not require the parties to revise the Seams Agreement to provide for identical counterflow allotments for each flowgate because the parties' counterflow treatments are set out in their respective OATTs, and the differences in counterflow allotments are known to all parties.

e. AFC/TFC Protocol, Data Exchange, Section 6.d

20. East Texas Cooperatives also express concern about section 6.d, which states that the two parties will exchange a list of reservations that should not be considered in AFC calculations. East Texas Cooperatives believe this provision should be revised to require

²⁵ East Texas Cooperatives' Request for Rehearing at 8.

²⁶ *Id.* at 8-9.

²⁷ Attachment C to the Entergy OATT, Section 4, "Inputs to Base Case Models and the AFC Formulas," Section 4.6, "Counter-flows;" Attachment C to the SPP OATT, Section 4, "Base Case Models."

²⁸ For example, under section 4.6 of Attachment C of the Entergy OATT, in the Planning Horizon, Entergy includes 100 percent of counterflows for firm and non-firm reservations and for firm schedules. In contrast, under section 4.5.5.3 of Attachment C of the SPP OATT, in the Day 2-31 horizon (equivalent to Entergy's Planning Horizon), SPP includes counterflows for confirmed reservations that "are expected to be scheduled based on actual historical scheduling data" and up to 50 percent of counterflows for firm confirmed reservations.

each party to make available to all transmission customers the list of every reservation excluded from the AFC calculations. East Texas Cooperatives also request that this list include the rationale for each exclusion, along with the time period over which the exclusion will be in effect.²⁹ East Texas Cooperatives request rehearing of the Commission's rejection of their request, which the Commission found to be beyond the scope of the proceeding, as the request did not involve data exchange between the parties, but rather between each party and its customers. East Texas Cooperatives claim that by rejecting the request on that basis the Commission ignored the importance of this information to customers and the importance of transparency.

Commission Determination

21. We deny East Texas Cooperatives' request for rehearing. The issue of whether the parties make available to transmission customers the list of unconsidered reservations is not within the scope of this Seams Agreement. As the Commission stated in the June 15 Order, the availability of AFC system information is governed by, among other things, the Commission's OASIS regulations, 18 C.F.R. Part 37 (2010), and the parties' respective OATTs. In the June 15 Order we noted that SPP's OATT provides that SPP will make such a list available.³⁰ Because customers' access to OASIS information is governed elsewhere, we will not order it to be a part of the Seams Agreement.

f. AFC/TFC Protocol's Lack of Available Transfer Capability (ATC) Coordination Requirement

22. East Texas Cooperatives request rehearing of the Commission's rejection of its request that the AFC/TFC Protocol be revised to address the coordination of ATC values and the ATC values at the interfaces, and to address what happens when ATC values on either side of an interface are different.³¹

²⁹ East Texas Cooperatives' Request for Rehearing at 9-10.

³⁰ Section 7.2(c) of SPP's Attachment C states:

The Transmission provider shall also create, maintain and provide a list of reservations from its OASIS that should not be considered in ATC/AFC calculations.

³¹ East Texas Cooperatives' Request for Rehearing at 10-11. Both Entergy and SPP use an AFC methodology to evaluate ATC in the short-term. *E.g.*, Attachment C to the Entergy OATT, Section 1.2, "Applicability."

Commission Determination

23. We deny East Texas Cooperatives' request for rehearing. As stated in the June 15 Order, the purpose of the Commission's requirement regarding transmission providers' ATC methods is that their methodologies be sufficiently transparent to allow for independent validation that their methodology has been consistently applied.³² In addition, the divergence of ATC values at the same interface is to be addressed through the NERC and North American Energy Standards Board (NAESB) processes.³³ As transmission providers, SPP and Entergy will be required to comply with relevant NERC and NAESB standards as they are developed. We will not impose a separate requirement here.

2. SPP's Compliance Filing

24. As noted above, on July 15, 2010, SPP filed proposed revisions to the Seams Agreement intended to comply with the June 15 Order. Specifically, SPP proposes to revise section 3.d.i of the AFC/TFC Protocol to remove the phrase "if these change are applicable," and it proposes to revise section 3.d.ii to remove "if inclusion in the Party's TFC and AFC models is appropriate and feasible." In addition, in both sections, SPP proposes to replace the phrase "incorporate . . . into models" with "update models with." SPP states that Entergy and SPP will meet prior to December 30, 2010, to work out the details of the data incorporation process.³⁴

³² See Preventing Undue Discrimination and Preference in Transmission Service, Order No. 890, FERC Stats. & Regs. ¶ 31,241 (2007), *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 and clarification*, Order No. 890-C, 126 FERC ¶ 61,228, at P 86 (2009), *order on reh'g*, Order No. 890-D, 129 FERC ¶ 61,126 (2009). In Order No. 890-C, the Commission found that "[t]he requirement, then, is not to achieve identical postings of ATC values on either side of an interface The requirement is, instead, to achieve consistency in such values through the development of ATC calculation methodologies that produce sufficiently accurate, consistent, equivalent, and replicable results. In some instances, . . . such as when there are differences in reservation status or when there are multiple interfaces between the transmission providers, it may not be possible or even practical to achieve identical values." See Order No. 890-C, 126 FERC ¶ 61,228 at P 86.

³³ See Order No. 890-B, 123 FERC ¶ 61,299 at P 16.

³⁴ SPP July 15, 2010 Transmittal Letter at 3.

25. SPP also proposes to revise the Coordination Protocol to identify the circumstances in which Entergy will incorporate SPP facilities into the Entergy models. As revised, the Coordination Protocol provides that Entergy will incorporate SPP facilities when Entergy receives one of three specific notifications from SPP: (1) a copy of the SPP Notice to Construct; (2) notice that SPP's Board of Directors has approved the SPP Transmission Expansion Plan; or (3) notice that the facility is in-service. SPP also proposes to revise the same section to state that Entergy will incorporate facilities on the SPP system into Entergy's models based on the in-service date for the facility, "subject to revision in the event of SPP's further notification of any confirmed construction delays."

26. SPP also proposes to delete the Coordination Protocol provision entitled "Granting of Flowgate Financial Rights to SPP" and to insert much of the deleted language into section 1.b.iii.l of the section of the Coordination Protocol entitled "Coordination of Transmission Service Request and Interconnection Request Study Processes."

27. We find that SPP's proposed revisions comply with the June 15 Order. However, as noted above, in the July 15, 2010 Transmittal Letter SPP states that it will meet with Entergy prior to December 30, 2010, to work out the data incorporation process provided for in section 3.d.ii of the AFC/TFC Protocol.³⁵ SPP does not state whether the process will be filed with the Commission. Therefore, we direct SPP to file the section 3.d.ii data incorporation process as an amendment to the AFC/TFC Protocol within 30 days of the date of this order. If SPP and Entergy have not yet finalized the section 3.d.ii process, SPP is directed to file a status report within 30 days of the date of this order and every 30 days thereafter until the process is finalized.

28. Similarly, while we acknowledge that this is not an issue with SPP's July 15, 2010 Compliance Filing, we note that section 5.b of the AFC/TFC Protocol provides that Entergy and SPP will institute a process for exchanging generation unit commitment and orders of dispatch data, including the content of the data exchange, within 90 days of the effective date of the AFC/TFC Protocol. The provision does not state whether the instituted process will be filed with the Commission. Therefore, we direct SPP to file the section 5.b process as an amendment to the AFC/TFC Protocol within 30 days of the date of this order.

29. East Texas Cooperatives claim that revised sections 3.d.i and 3.d.ii should be rejected because they do not provide guidance as to when the parties will incorporate transmission network changes and adjacent transmission providers' changes in their models. East Texas Cooperatives argue that the revised provision stating that the parties will incorporate "significant" changes to the transmission network in their models is not

³⁵ SPP July 15, 2010 Transmittal Letter at 3.

sufficiently specific and gives the parties undue discretion.³⁶ East Texas Cooperatives claims that “as soon as reasonably practicable” is as ambiguous and gives as much discretion as “if applicable.”³⁷

30. We disagree with East Texas Cooperatives that sections 3.d.i and 3.d.ii should be rejected. The revisions remove the language (“if these change are applicable” and “if inclusion . . . is appropriate and feasible”) that gave SPP and Entergy undue discretion in deciding when the parties will incorporate transmission configuration changes and generator information into their models. As revised, section 3.d.i provides, “As soon as reasonably practicable, each Party shall update its models” We find that the phrase “as soon as reasonably practicable” provides sufficient assurance that SPP and Entergy will update their models quickly. However, we note that as discussed above, SPP must revise section 3.d to specify the timing and frequency of the information that will then be incorporated under these provisions.

31. For these reasons, we find that SPP has complied with the directives of the June 15 Order by clarifying certain provisions in the AFC/TFC Protocol and the Coordination Protocol, and we accept the proposed revisions for filing. In addition, the Commission directs SPP to file the amendments to the AFC/TFC Protocol within 30 days of the date of this order, as described above.

The Commission orders:

(A) East Texas Cooperatives’ request for rehearing regarding sections 3.a.ii and 3.d of the AFC/TFC Protocol is hereby granted, and SPP is directed to file revisions to those sections within 30 days of the date of this order, as discussed in the body of this order.

(B) The remainder of East Texas Cooperatives’ request for rehearing is denied, as discussed in the body of this order.

(C) SPP is hereby directed to file the process instituted pursuant to section 3.d.ii of the AFC/TFC Protocol and the process instituted pursuant to section 5.b of the AFC/TFC Protocol as amendments to the AFC/TFC Protocol within 30 days of the date of this order, as discussed in the body of this order. If SPP and Entergy have not yet finalized the section 3.d.ii process, SPP is directed to file a status report within 30 days of the date of this order and every 30 days thereafter until the process is finalized.

³⁶ East Texas Cooperatives Protest at 2.

³⁷ *Id.* at 3-4.

(D) The revisions to the Seams Agreement submitted in SPP's July 15, 2010 compliance filing are accepted for filing, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.