194 FERC ¶ 61,047
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Laura V. Swett, Chairman;
David Rosner, Lindsay S. See,
Judy W. Chang, and David LaCerte.

Southwest Power Pool, Inc. Docket Nos. ER24-2026-001
ER24-2026-002

ORDER ON COMPLIANCE

(Issued January 22, 2026)

1. On August 25, 2025, as amended on October 21, 2025, Southwest Power Pool, Inc. (SPP) submitted proposed revisions to Attachment V of its Open Access Transmission Tariff (Tariff)[1] in compliance with the requirements of Order Nos. 2023 and 2023-A[2] and the Commission's order on compliance issued on June 26, 2025 (Second Compliance Filing).[3] As discussed below, we find that the Second Compliance Filing complies with the requirements of Order Nos. 2023 and 2023-A and with the Commission's directives in the First Compliance Order. Accordingly, we accept the Second Compliance Filing, effective June 26, 2025, as requested.

I. Background

2. Order Nos. 2023 and 2023-A amended the Commission's *pro forma* Large Generator Interconnection Procedures (LGIP), *pro forma* Large Generator Interconnection Agreement (LGIA), *pro forma* Small Generator Interconnection Procedures (SGIP), and *pro forma* Small Generator Interconnection Agreement (SGIA).[4]

[1] See Appendix for tariff records accepted in this order.

[2] *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

[3] *Sw. Power Pool, Inc.*, 191 FERC ¶ 61,230 (2025) (First Compliance Order).

[4] The *pro forma* LGIP and *pro forma* LGIA establish the terms and conditions under which public utilities that own, control, or operate facilities for transmitting energy in interstate commerce must provide interconnection service to generating facilities larger than 20 MW. The *pro forma* SGIP and *pro forma* SGIA establish the terms and conditions under which public utilities that own, control, or operate facilities

Order No. 2023 requires all public utility transmission providers to adopt revised *pro forma* LGIPs, *pro forma* LGIAs, *pro forma* SGIPs, and *pro forma* SGIAs. These revisions ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner, and will prevent undue discrimination.[5] In Order No. 2023, the Commission adopted a comprehensive package of reforms in three general categories: (1) reforms to implement a first-ready, first-served cluster study process; (2) reforms to increase the speed of interconnection queue processing; and (3) reforms to incorporate technological advancements into the interconnection process.

3. On May 16, 2024, SPP submitted proposed revisions to its Generator Interconnection Procedures (GIP) and *pro forma* Generator Interconnection Agreements (GIA) in Attachment V of its Tariff to comply with the requirements of Order Nos. 2023 and 2023-A.[6] In the First Compliance Order, the Commission found that SPP's First Compliance Filing partially complied with the requirements of Order Nos. 2023 and 2023-A. Accordingly, the Commission accepted SPP's First Compliance Filing in part, effective June 26, 2025, and directed SPP to submit a further compliance filing within 60 days of the date of the order.[7] Specifically, the Commission directed SPP to submit further revisions to its Tariff to comply with the following requirements: cluster study process, site control, LGIA deposit, affected system study process and modeling requirements, co-located generating facilities, incorporating alternative transmission technologies, errata requirements, and other issues, as discussed below.

II. SPP's Second Compliance Filing

4. SPP proposes revisions to its GIP and *pro forma* GIAs to comply with the Commission's directives in the First Compliance Order. SPP requests that the Commission accept the proposed Tariff revisions effective June 26, 2025, consistent with the effective date established in the First Compliance Order.

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for transmitting energy in interstate commerce must provide interconnection service to generating facilities no larger than 20 MW. Order No. 2023, 184 FERC ¶ 61,054 at P 2.

[5] Order No. 2023, 184 FERC ¶ 61,054 at P 1.

[6] *Sw. Power Pool, Inc.*, Filing, Docket No. ER24-2026-000 (filed May 16, 2024) (First Compliance Filing).

[7] First Compliance Order, 191 FERC ¶ 61,230 at P 1.

III. Notice and Responsive Pleadings

5. Notice of SPP's Second Compliance Filing was published in the *Federal Register*, 90 Fed. Reg. 42000 (Aug. 28, 2025), with interventions and protests due on or before September 15, 2025. None was filed. Notice of SPP's October 21, 2025, amended Second Compliance Filing was issued on October 21, 2025, with interventions and protests due on or before November 12, 2025, at 5:00 PM EST. None was filed.

IV. Discussion

6. As discussed below, we find that SPP's Second Compliance Filing complies with the requirements of Order Nos. 2023 and 2023-A and with the directives in the First Compliance Order. Accordingly, we accept the Second Compliance Filing, effective June 26, 2025, as requested.

7. We find that SPP has complied with the following directives in the First Compliance Order by proposing to adopt, without modification, the *pro forma* LGIP provisions required by Order Nos. 2023 and 2023-A: (1) the requirement in *pro forma* LGIP section 9.11 that the affected system restudy be completed within 60 calendar days from the date of notice of the need for such restudy;[8] and (2) the Commission's revisions to *pro forma* LGIP section 3.1.2 to remove existing language requiring interconnection customers to submit a deposit with each interconnection request even when more than one request is submitted for a single site.[9]

1. Proposed Variations

8. As discussed further below, SPP has proposed certain variations from the Commission's requirements in Order Nos. 2023 and 2023-A. The Commission explained in Order No. 2023 that such variations would be reviewed under the same standard allowed by Order Nos. 2003, 2006, and 845.[10] In Order No. 2003, the Commission

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[8] First Compliance Order, 191 FERC ¶ 61,230 at P 188; *see also* Sw. Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1, attach. V, § 9 (Affected System Study) (4.0.1), § 9.11 (Restudy) (hereinafter, SPP Tariff).

[9] First Compliance Order, 191 FERC ¶ 61,230 at P 207; *see also* SPP Tariff, attach. V, § 3 (Interconnection Requests) (23.0.2), § 3.1.2 (Submission).

[10] Order No. 2023, 184 FERC ¶ 61,054 at P 1764 (citing *Standardization of Generator Interconnection Agreements & Procs.*, Order No. 2003, 104 FERC ¶ 61,103, at P 826 (2003); *Standardization of Small Generator Interconnection Agreements & Procs*., Order No. 2006, 111 FERC ¶ 61,220, at PP 447, 549, *order on reh'g*, Order No. 2006-A, 113 FERC ¶ 61,195 (2005), *order granting clarification*, Order No. 2006-B, 116 FERC ¶ 61,046 (2006); *see also Reform of Generator Interconnection Procs. &*

permitted Regional Transmission Organizations/Independent System Operators (RTO/ISO) to seek "independent entity variations" for pricing and non-pricing provisions, and stated that RTOs/ISOs "shall therefore have greater flexibility to customize [their] interconnection procedures and agreements to fit regional needs."[11] The Commission stated that this approach recognizes that an RTO/ISO is less likely to act in an unduly discriminatory manner than a transmission provider that is a market participant.[12] The Commission has granted independent entity variations from interconnection-related rulemakings where the RTO/ISO demonstrates that the proposed variation: (1) is just and reasonable and not unduly discriminatory or preferential; and (2) accomplishes the purposes of the order.[13] It is not a sufficient justification to state that a variation conforms to current RTO/ISO practices or to the RTO's/ISO's tariff definitions and terminology.[14] Even if the transmission provider is an RTO/ISO, it must still justify its variations in light of the Commission's *pro forma* LGIP and/or *pro forma* LGIA and/or *pro forma* SGIP and/or *pro forma* SGIA.[15] We evaluate SPP's proposed variations from the requirements of Order Nos. 2023 and 2023-A accordingly.

2. Cluster Study Process

9. In Order No. 2023, the Commission revised the *pro forma* LGIP and *pro forma* LGIA to require transmission providers to study interconnection requests in clusters. The

Agreements, Order No. 845, 163 FERC ¶ 61,043, at P 556 (2018), *order on reh'g*, Order No. 845-A, 166 FERC ¶ 61,137, *order on reh'g*, Order No. 845-B, 168 FERC ¶ 61,092 (2019)).

[11] Order No. 2003, 104 FERC ¶ 61,103 at P 827.

[12] *Id.*

[13] *See, e.g.*, *ISO New England Inc.*, 164 FERC ¶ 61,222, at P 9 (2018) (citing Order No. 2003, 104 FERC ¶ 61,103 at PP 26, 827; *Midcontinent Indep. Sys. Operator, Inc.*, 154 FERC ¶ 61,247, at P 20 (2016); *Cal. Indep. Sys. Operator Corp.*, 140 FERC ¶ 61,070, at P 44 (2012)).

[14] *See Cal. Indep. Sys. Operator Corp.*, 170 FERC ¶ 61,112, at P 11 (2020); *Sw. Power Pool, Inc.*, 170 FERC ¶ 61,042, at P 14 (2020); *ISO New England Inc.*, 170 FERC ¶ 61,209, at P 14 (2020); *Midcontinent Indep. Sys. Operator, Inc.*, 169 FERC ¶ 61,221, at P 18 (2019); *PJM Interconnection, L.L.C.*, 169 FERC ¶ 61,226, at P 15 (2019).

[15] *See PJM Interconnection, L.L.C.*, 108 FERC ¶ 61,025, at P 16 (2004).

Commission added several new, and revised several existing, defined terms to facilitate this change.[16]

10. Further, as relevant here, the Commission revised section 3.5.2 (Requirement to Post Interconnection Study Metrics) of the *pro forma* LGIP to require transmission providers to post metrics for cluster study and restudy processing time.[17] The Commission also revised section 4.4.1 of the *pro forma* LGIP to incorporate the material modification process as part of the cluster study process.[18] The Commission revised section 4.4.5 of the *pro forma* LGIP to require that an interconnection customer receive an extension of fewer than three cumulative years of the generating facility's commercial operation date without requiring it to request such an extension from the transmission provider.[19] The Commission revised *pro forma* LGIP section 7.5 (Cluster Study Restudies) to, among other things, require the transmission provider to complete any cluster restudy within 150 calendar days and require the transmission provider to notify interconnection customers that a cluster restudy is required within 30 calendar days after the cluster study report meeting.[20]

a. Defined Terms

i. First Compliance Order

11. In the First Compliance Order, the Commission found that SPP's proposal to incorporate defined terms in the Commission's *pro forma* LGIP and *pro forma* LGIA into its Tariff partially complied with the requirements of Order Nos. 2023 and 2023-A.[21] Specifically, the Commission found that SPP's proposed revisions to the definition of "interconnection study" in its GIP did not incorporate a reference to the "surplus interconnection service study" contained in the *pro forma* LGIP, without explanation.[22]

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[16] Order No. 2023, 184 FERC ¶ 61,054; *see also pro forma* LGIP § 1; *pro forma* LGIA art. 1.

[17] Order No. 2023, 184 FERC ¶ 61,054 at P 259; *see also pro forma* LGIP § 3.5.2.

[18] Order No. 2023, 184 FERC ¶ 61,054 at P 285; *see also pro forma* LGIP § 4.4.1.

[19] Order No. 2023, 184 FERC ¶ 61,054 at P 293; *see also pro forma* LGIP § 4.4.5.

[20] Order No. 2023, 184 FERC ¶ 61,054 at PP 317, 329; *see also pro forma* LGIP § 7.5.

[21] First Compliance Order, 191 FERC ¶ 61,230 at P 72.

[22] *Id.*

Further, the Commission found that SPP's proposed revisions to the definition of "scoping meeting" in its GIP did not incorporate the Commission's removal of the phrase "to determine the potential feasible Points of Interconnection," without explanation. In addition, the Commission found that SPP's proposed revisions to its *pro forma* GIA did not incorporate the defined term "cluster," contained in the Commission's *pro forma* LGIA, despite SPP's explanation that it incorporated this defined term into its *pro forma* GIA. Accordingly, the Commission directed SPP to submit, within 60 days of the date of the First Compliance Order, a further compliance filing to revise these definitions to adopt the language in the *pro forma* LGIP and *pro forma* LGIA or further justify its proposal under the independent entity variation standard.

ii. Second Compliance Filing

12. In the Second Compliance Filing, as amended, SPP proposes revisions to defined terms in its GIP and *pro forma* GIAs[23] to comply with the Commission's compliance directives. First, SPP proposes revisions to the defined term "interconnection study" in its GIP section 1 and article 1 of its *pro forma* GIAs to incorporate reference to the "surplus interconnection service study," as in the *pro forma* definition of "interconnection study," with modification to use the term "surplus interconnection service impact study" to reflect the existing terminology in its GIP.[24] Second, SPP proposes revisions to the definition of "scoping meeting" in its GIP section 1 and article 1 of its *pro forma* GIAs to remove the phrase "to determine the feasible Points of Interconnection" from the definition, consistent with the Commission's revisions to the *pro forma* definition of "scoping meeting."[25]

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[23] SPP Tariff, attach. V, app. 6 (*pro forma* GIA) (26.0.2). SPP also proposes conforming revisions to its *pro forma* Interim GIA, as well as to its *pro forma* GIA and *pro forma* Interim GIA for use when Western Area Power Administration-Upper Great Plains region (Western-UGP) is a party to the GIA as the transmission owner. SPP Tariff, attach. V, app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2). Unless otherwise indicated, SPP's proposed revisions to its *pro forma* GIA also apply to its *pro forma* Interim GIA, *pro forma* Western-UGP GIA, and *pro forma* Western-UGP Interim GIA.

[24] Second Compliance Filing at 5; Amended Second Compliance Filing at 2-3; SPP Tariff, attach. V, § 1 (Definitions) (18.0.3), Interconnection Study; *id.* attach. V, app. 6 (*pro forma* GIA) (26.0.2); *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art. 1 (Definitions) Interconnection Study.

[25] Second Compliance Filing at 5-6; SPP Tariff, attach. V, § 1 (Definitions) (18.0.3), Scoping Meeting; *id.* attach. V, app. 6 (*pro forma* GIA) (26.0.2); *id.* app. 8

13. Further, SPP explains that it previously proposed revisions to article 1 of its *pro forma* GIA to adopt the Commission's *pro forma* LGIA definition of "cluster" as part of a clean-up filing for Attachment V of its Tariff submitted on August 6, 2025 (August 2025 Clean-Up Filing).[26]

iii. Commission Determination

14. We find that SPP's proposed revisions to GIP section 1 and article 1 of its *pro forma* GIAs adopt the Commission's revisions to the *pro forma* definition of "scoping meeting" that removed the phrase "to determine the feasible Points of Interconnection," consistent with the Commission's compliance directive in the First Compliance Order and the requirements of Order Nos. 2023 and 2023-A.[27] In addition, we accept SPP's proposed independent entity variations in GIP section 1 and article 1 of its *pro forma* GIAs to modify the *pro forma* definition of "interconnection study" to reflect SPP's existing GIP terminology. We find that the proposed variations are just and reasonable, not unduly discriminatory or preferential, and accomplish the purposes of Order Nos. 2023 and 2023-A because they facilitate a first-ready, first-served cluster study process.

15. Further, we note that, on October 1, 2025, the Commission accepted revisions to article 1 of SPP's *pro forma* GIA to adopt the Commission's *pro forma* definition of "cluster," without modification, effective June 26, 2025.[28] Therefore, we find that SPP has complied with the Commission's directive in the First Compliance Order concerning the defined term "cluster" because the revision has already been incorporated into SPP's *pro forma* GIA.

(*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art. 1 (Definitions) Scoping Meeting.

[26] Second Compliance Filing at 5 (citing *Sw. Power Pool, Inc.*, Submission of Corrections to Attachment V of the Tariff, Docket No. ER25-3101-000, at 11 (filed Aug. 6, 2025)).

[27] First Compliance Order, 191 FERC ¶ 61,230 at P 72.

[28] *Sw. Power Pool, Inc.*, Docket No. ER25-3101-000 (Oct. 1, 2025) (delegated order); SPP Tariff, attach. V, app. 6 (26.0.1), art. 1.

b. DISIS Process

i. First Compliance Order

16. In the First Compliance Order, the Commission granted several of SPP's requested independent entity variations to maintain its existing three-stage Definitive Interconnection System Impact Study (DISIS) process – including the various timeframes for customer engagement, conducting studies, and other aspects of the study process – because the Commission found that the proposal was just and reasonable, not unduly discriminatory or preferential, and accomplished the purposes of Order Nos. 2023 and 2023-A.[29] However, the Commission found that SPP's proposed revisions to GIP section 3.5.2 to adopt requirements for the transmission provider to post metrics for cluster study and restudy processing time partially complied with the requirements of Order Nos. 2023 and 2023-A.[30] Specifically, the Commission found that SPP did not demonstrate how its proposed revisions to GIP section 3.5.2.4, which provide that SPP will calculate the mean completion time for the interconnection facilities studies from the close of the "DISIS Review Period"[31] (rather than from the close of the "cluster request window"[32] as provided in section 3.5.2.3 of the *pro forma* LGIP), meet the independent entity variation standard.[33] Therefore, the Commission directed SPP to submit a further compliance filing to revise GIP section 3.5.2.4 to incorporate the language in the *pro forma* LGIP or further justify its proposal under the independent entity variation standard.

17. Further, the Commission found that SPP's proposed revisions to GIP section 8.8 (DISIS Restudy), which incorporated, with modification, requirements related to cluster study restudies in *pro forma* LGIP section 7.5, only partially complied with the requirements of Order Nos. 2023 and 2023-A.[34] Specifically, the Commission found that

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[29] First Compliance Order, 191 FERC ¶ 61,230 at P 75.

[30] *Id.* P 75.

[31] In the First Compliance Order, the Commission granted SPP's proposed independent entity variation to retain its DISIS Review Period in place of the *pro forma* "customer engagement window." First Compliance Order, 191 FERC ¶ 61,230 at P 73.

[32] In the First Compliance Order, the Commission granted SPP's proposed independent entity variation to retain the defined term DISIS Queue Cluster Window in place of the *pro forma* defined term "cluster request window." *Id.* P 72.

[33] *Id.* P 75.

[34] *Id.* P 78.

SPP did not explain how its proposal to omit timing requirements for notifying interconnection customers that a restudy is required accomplishes the purposes of Order No. 2023. Therefore, the Commission directed SPP to submit a further compliance filing to revise its GIP section 8.8 to incorporate the language in the *pro forma* LGIP regarding the timing by which SPP will provide notice to interconnection customers that a restudy is required or further justify its proposal under the independent entity variation standard.

18. Finally, the Commission directed SPP to submit a further compliance filing to revise its Tariff to: (1) correct a typographical error in GIP section 4.4.5;[35] (2) correct the omission of certain language in article 11.2 of SPP's *pro forma* Western-UGP GIA needed to ensure that SPP complies with the Commission's restriction that the cumulative extension for a commercial operation date be limited to three years or fewer;[36] and (3) correct numbering issues identified in SPP's proposed GIP section 4.4.1.[37]

ii. Second Compliance Filing

19. SPP proposes revisions to GIP section 3.5.2.4(E) to adopt the *pro forma* LGIP requirement to post the mean completion time for interconnection facilities studies from the close of the DISIS Queue Cluster Window, which is SPP's term for the cluster request window in the *pro forma* LGIP.[38]

20. In addition, SPP proposes to add language to GIP section 8.8 requiring SPP to notify interconnection customers in writing of the need for a restudy within 30 calendar days after the end of DISIS Decision Point Two,[39] and to post on its Open Access Same-Time Information System (OASIS) that a restudy is required.[40] SPP argues that this proposal is just and reasonable because SPP determines whether a restudy of DISIS Phase Two is needed after Decision Point Two ends and, therefore, requiring SPP to

[35] *Id.* P 76.

[36] *Id.* P 77.

[37] *Id.* P 80.

[38] Second Compliance Filing at 7; SPP Tariff, attach. V, § 3 (Interconnection Requests) (23.0.2), § 3.5.2.4(E).

[39] Decision Point Two is the period of time following the posting of the results of DISIS Phase Two. SPP Tariff, attach. V, § 1 (Definitions) (19.0.0).

[40] Second Compliance Filing at 7-8; SPP Tariff, attach. V, § 8 (Definitive Planning Phase) (19.0.2), § 8.8 (DISIS Restudy).

notify interconnection customers within 30 calendar days of the end of Decision Point Two supports the Commission's goals of more efficient interconnection processing.

21. Finally, SPP explains that it proposed GIP revisions in the August 2025 Clean-Up Filing that were responsive to the Commission's compliance directives, including: (1) revisions to correct a typographical error in the last sentence of GIP section 4.4.5 where a reference to "Section 4.4.4" should be updated to "Section 4.4.5"; (2) revisions to article 11.2 of its *pro forma* Western-UGP GIA to include language regarding commercial operation date extensions; and (3) revisions to GIP section 4.4.1 to correct ministerial numbering errors.[41]

iii. Commission Determination

22. We accept SPP's proposed revisions to GIP section 3.5.2.4(E) to adopt the *pro forma* LGIP requirement to post the mean completion time for interconnection facilities studies from the close of the DISIS Queue Cluster Window because the revisions comply with the Commission's directive in the First Compliance Order.

23. Further, we accept SPP's proposed independent entity variation in GIP section 8.8 to require SPP to notify interconnection customers in writing of the need for a restudy, and to post on its OASIS that a restudy is required within 30 calendar days after the end of DISIS Decision Point Two,[42] instead of within 30 calendar days of the "cluster study report meeting" as in the *pro forma* LGIP.[43] We find that SPP's proposed independent entity variation is just and reasonable, not unduly discriminatory or preferential, and accomplishes the purposes of Order Nos. 2023 and 2023-A because it provides notice that restudy is needed as required in the *pro forma* LGIP, while reflecting the terminology and timing of SPP's three-phase DISIS process.

24. Finally, we note that, on October 1, 2025, the Commission accepted revisions to GIP sections 4.4.1 and 4.4.5 and to article 11.2 of SPP's *pro forma* Western-UGP GIA that corrected the errors identified in the First Compliance Order, effective June 26, 2025.[44] Therefore, we find that SPP has complied with the Commission's directive in the

[41] Second Compliance Filing at 7-8 (citing August 2025 Clean-Up Filing at 7, 12).

[42] SPP Tariff, attach. V, § 8 (Definitive Planning Phase) (19.0.2), § 8.8 (DISIS Restudy); *see also pro forma* LGIP § 7.5 (Cluster Study Restudies).

[43] *Pro forma* LGIP § 7.5 (Cluster Study Restudies).

[44] *Sw. Power Pool, Inc.*, Docket No. ER25-3101-000 (Oct. 1, 2025) (delegated order); SPP Tariff, attach. V, § 4 (Interconnection Request Evaluation Process) (11.0.0), §§ 4.4.1, 4.4.5; *id.* attach. V, app. 13 (*pro forma* Western-UGP GIA) (22.0.1), art. 11.2.

First Compliance Order because the revisions have already been incorporated into SPP's GIP and *pro forma* Western-UGP GIA.

3. Site Control

25. In Order No. 2023, the Commission revised the definition of "site control" in section 1 (Definitions) of the *pro forma* LGIP and article 1 (Definitions) of the *pro forma* LGIA,[45] and revised section 3.4.2 of the *pro forma* LGIP to require interconnection customers to demonstrate 90% site control at the time of submission of the interconnection request.[46] Also, as relevant here, the Commission revised section 3.4.2 of the *pro forma* LGIP to provide that interconnection customers with regulatory limitations may submit an initial deposit in lieu of site control of $10,000 per MW, subject to a floor of $500,000 and a ceiling of $2 million, which shall be refundable but may not be applied toward interconnection studies or withdrawal penalties, if applicable.

26. The Commission required each transmission provider to define regulatory limitations relevant to its service territory, to publicly post the definition, and to provide a narrative description of how it defines regulatory limitations as part of its compliance filing.[47] The Commission did not require a uniform definition of regulatory limitations for all transmission providers, but clarified that a regulatory limitation is generally a federal, state, Tribal, or local law that makes it practically infeasible to obtain site control within the time frame detailed in the *pro forma* LGIP.

a. First Compliance Order

27. In the First Compliance Order, the Commission found that SPP's proposed Tariff revisions regarding site control partially complied with the requirements in Order Nos. 2023 and 2023-A.[48] Specifically, the Commission found that SPP's proposed revisions to adopt the Commission's *pro forma* definition of "site control" in its GIP and *pro forma* GIA did not fully incorporate the Commission's revisions to this definition adopted in Order Nos. 2023 and 2023-A.[49] Accordingly, the Commission directed SPP to make a further compliance filing to fully adopt the Commission's revisions to the

[45] Order No. 2023, 184 FERC ¶ 61,054 at P 584; *see also pro forma* LGIP § 1; *pro forma* LGIA art. 1.

[46] Order No. 2023, 184 FERC ¶ 61,054 at P 594; *see also pro forma* LGIP § 3.4.2.

[47] Order No. 2023, 184 FERC ¶ 61,054 at P 607.

[48] First Compliance Order, 191 FERC ¶ 61,230 at P 112.

[49] *Id.* P 113.

pro forma definition of "site control" or justify its proposed variation under the independent entity variation standard.

28. Additionally, the Commission found that SPP did not request an independent entity variation for, or otherwise attempt to support, its proposal to retain its existing GIP provisions requiring 100% site control, as opposed to the Commission's requirement in Order No. 2023 for 90% site control, at the time of submission of an interconnection request.[50] Accordingly, the Commission directed SPP to submit a compliance filing to either justify, as an independent entity variation, its proposal to retain the requirement for an interconnection customer to demonstrate 100% site control at the time of submission of an interconnection request or adopt the *pro forma* LGIP site control provision required by Order No. 2023.

29. Finally, the Commission found that the First Compliance Filing did not address the Commission's requirement in Order No. 2023 for transmission providers to provide a narrative description of how they will define regulatory limitation as part of the compliance filing.[51] Accordingly, the Commission directed SPP to submit a further compliance filing to provide this narrative description.

b. Second Compliance Filing

30. In the Second Compliance Filing, SPP proposes to incorporate the Commission's revisions to the *pro forma* definition of "site control" into its GIP and *pro forma* GIAs.[52] However, SPP notes that it also proposes to retain, in its definition of "site control," an existing reference to site control for generating facility tie lines and, accordingly, proposes to include this reference along with its adoption of the second site control option of the *pro forma* LGIP.[53]

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[50] *Id.* P 114 (citing Order No. 2023, 184 FERC ¶ 61,054 at P 596).

[51] *Id.* P 115 (citing Order No. 2023, 184 FERC ¶ 61,054 at P 607); *id.* P 110 (citing SPP Tariff, attach. V, § 8 (17.0.0), § 8.2 (Execution of Generator Interconnection Study Agreement)).

[52] Second Compliance Filing at 8-9; SPP Tariff, attach. V, § 1 (Definitions) (18.0.3), Site Control; *id.* attach. V, app. 6 (*pro forma* GIA) (26.0.2); *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art. 1 (Definitions), Site Control.

[53] SPP Tariff, attach. V, § 1 (Definitions) (18.0.3), Site Control ("Site Control may be demonstrated by documentation establishing . . . (1) ownership of, a leasehold interest in, or a right to develop a site of sufficient size [for the purpose of constructing] *to*

31. Further, SPP proposes to retain the existing requirement in its GIP for 100% site control for the generating facility at the time of submission of an interconnection request, which SPP notes has been part of its GIP for many years.[54] SPP asserts that this requirement deters speculative requests, demonstrates customer readiness, does not limit interconnection customers' ability to interconnect, and is just and reasonable and necessary to the continued efficacy of its interconnection process.

32. Lastly, SPP proposes to include a definition of the term "regulatory limitation" in its publicly posted SPP Business Practice 7250.[55] SPP states that it intends to define regulatory limitation as "a federal, state, or Tribal government process for acquiring Site Control that cannot be completed in the timeframe required for demonstration of Site Control."[56] SPP asserts that, in the case of a regulatory limitation, the interconnection customer would be required to provide a signed affidavit, documentation describing the regulatory limitation, and a deposit in lieu of site control demonstration pursuant to GIP section 8.2.

c. Commission Determination

33. We accept SPP's proposed revisions to the definition of "site control" in its GIP section 1 and *pro forma* GIAs to adopt the Commission's revisions to the *pro forma* "site control" definition, with modification to maintain consistency with SPP's existing Tariff requirements. Further, we accept SPP's proposed independent entity variation to retain its existing requirement, in GIP section 8.2(a), that interconnection customers demonstrate 100% site control for their generating facilities at the time of submission of an interconnection request. We find that these proposals are just and reasonable, not unduly discriminatory or preferential, and accomplish the purposes of Order Nos. 2023 and 2023-A because they help prevent interconnection customers from submitting interconnection requests for speculative, commercially non-viable generating facilities.[57]

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construct and operate the Generating Facility or Generating Facility's tie line" or "(2) an option to purchase or acquire a leasehold site of sufficient size [for such purpose] *to construct and operate the Generating Facility or Generating Facility's tie line*"). Proposed deletions are in brackets, and proposed additions are in italics.

[54] Second Compliance Filing at 9-10.

[55] *Id.* at 10-11.

[56] *Id.* at 11.

[57] Order No. 2023, 184 FERC ¶ 61,054 at P 583.

34. Finally, we find that SPP's Second Compliance Filing complies with the Commission's requirement in Order No. 2023 concerning regulatory limitations because SPP provides a narrative description of how it will define a "regulatory limitation" relevant to its service territory. Consistent with Order No. 2023, SPP also states that it will incorporate this definition into SPP Business Practice 7250, which is publicly posted on SPP's website.

4. LGIA Deposit

35. In Order No. 2023, the Commission revised the *pro forma* LGIP and *pro forma* LGIA to require an interconnection customer to submit a deposit when executing an LGIA. The Commission also revised section 11.3 of the *pro forma* LGIP and article 11.5 of the *pro forma* LGIA to require the transmission provider to treat the LGIA deposit as part of the security that the interconnection customer must provide to the transmission provider for the construction of network upgrades and interconnection facilities.[58] Additionally, the Commission revised article 11.5 (Provision of Security) of the *pro forma* LGIA to require the transmission provider to draft Appendix B of the interconnection customer's LGIA to clearly explain and estimate at which point of construction the interconnection customer's LGIA deposit will be depleted, and the interconnection customer must provide additional financial security.[59]

a. First Compliance Order

36. In the First Compliance Order, the Commission found that SPP's proposal partially complied with the requirements of Order Nos. 2023 and 2023-A.[60] Specifically, the Commission found that SPP's proposal to retain its existing financial security and deposit framework meets the independent entity variation standard because SPP's initial payment requirement is similar to the Commission's LGIA deposit. However, the Commission found that SPP failed to explain how its proposal to omit the other deposit provisions in *pro forma* LGIP section 11.3 and *pro forma* LGIA article 11.5 accomplishes the purposes of Order Nos. 2023 and 2023-A.[61] Specifically, SPP proposed not to adopt the Commission's revisions to section 11.3 of the *pro forma* LGIP and article 11.5 of the *pro forma* LGIA, which require the transmission provider to treat the LGIA deposit as part of the security that the interconnection customer must provide to the

[58] *Id.* P 717; *see also pro forma* LGIP § 11.3; *pro forma* LGIA art. 11.5.

[59] Order No. 2023, 184 FERC ¶ 61,054 at P 718; *see also pro forma* LGIA art. 11.5.

[60] First Compliance Order, 191 FERC ¶ 61,230 at PP 124-125.

[61] *Id.*

transmission provider for the construction of network upgrades and interconnection facilities. Additionally, SPP proposed to not adopt the Commission's revisions to article 11.5 of the *pro forma* LGIA that require the transmission provider to provide an explanation and estimate of the dates at which an interconnection customer will need to provide additional security for construction of interconnection facilities and network upgrades due to depletion of the LGIA deposit. Therefore, the Commission directed SPP to submit a further compliance filing that adopts the language of *pro forma* LGIP section 11.3 and *pro forma* LGIA article 11.5 or further justify its proposal under the independent entity variation standard.

b. Second Compliance Filing

37. SPP proposes revisions to GIP section 11.3 to state that SPP will apply the financial security deposits provided pursuant to GIP sections 8.2, 8.5.1, and 8.5.2 toward an interconnection customer's initial payment required under article 11.6 of SPP's *pro forma* GIA.[62] SPP argues that this proposal aligns with SPP's existing financial security deposit process, which was approved by the Commission in the First Compliance Order, and meets the Commission's goal in Order No. 2023 of streamlining the interconnection process by applying the amounts paid in financial security deposits toward the initial payment required under article 11.6 of its *pro forma* GIA.[63]

38. SPP also proposes revisions to article 11.7A of its *pro forma* GIA and *pro forma* Western-UGP GIA to align with revisions to the Commission's *pro forma* LGIA article 11.5 related to the use of the LGIA deposit before requiring additional security from the interconnection customer.[64] Specifically, SPP proposes to revise article 11.7A to state that the transmission provider and transmission owner must use the initial payment required under article 11.6 of SPP's *pro forma* GIA before requiring the interconnection customer to submit additional security, and that the transmission provider and transmission owner must specify the dates for which the interconnection customer must provide additional security. SPP argues that this proposal is just and reasonable and accomplishes the purposes of Order Nos. 2023 and 2023-A because it ensures that amounts paid as part of initial financial securities and deposits are applied toward initial

[62] Second Compliance Filing at 12; SPP Tariff, attach. V, § 11 (7.0.1), § 11.3 (Execution and Filing).

[63] Second Compliance Filing at 12-13 (quoting Order No. 2023, 184 FERC ¶ 61,054 at P 717).

[64] *Id.* at 13; SPP Tariff, attach. V, app. 6 (*pro forma* GIA) (26.0.2), art. 11.7A; *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2), art. 11.7A.

construction costs before an additional deposit is due.[65] SPP contends that this proposal meets the Commission's stated goal of streamlining the interconnection process.[66]

c. Commission Determination

39. We accept SPP's proposed independent entity variation in GIP section 11.3 to apply an interconnection customer's financial security deposits toward an interconnection customer's initial payment under article 11.6 of SPP's *pro forma* GIA.[67] We find that this proposed revision is just and reasonable, not unduly discriminatory or preferential, and accomplishes the purposes of Order Nos. 2023 and 2023-A because it aligns with the Commission's requirement, in *pro forma* LGIP section 11.3 and *pro forma* LGIA article 11.5, that the transmission provider must treat the LGIA deposit as part of the security that an interconnection customer must provide for the construction of network upgrades and interconnection facilities. We also accept SPP's proposed independent entity variation in article 11.7A of its *pro forma* GIA and *pro forma* Western-UGP GIA to refer to specific financial security payments under SPP's GIP. We find that this revision is just and reasonable, not unduly discriminatory or preferential, and accomplishes the purposes of Order Nos. 2023 and 2023-A because it aligns with the requirement in article 11.5 of the Commission's *pro forma* LGIA that the transmission provider must provide an explanation and estimate of the dates at which an interconnection customer will need to provide additional security for construction of interconnection facilities and network upgrades due to depletion of the LGIA deposit.

5. Incorporating the Enumerated Alternative Transmission Technologies

40. In Order No. 2023, the Commission revised section 7.3 of the *pro forma* LGIP to require transmission providers to evaluate the following enumerated list of alternative transmission technologies: static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting.[68] The Commission revised *pro forma* LGIP section 7.3 to require transmission providers to evaluate the list

[65] Second Compliance Filing at 13.

[66] *Id.* (citing Order No. 2023, 184 FERC ¶ 61,054 at P 717).

[67] As noted above, the Commission previously accepted SPP's proposal to retain its initial payment as part of its financial security and deposit framework, finding that the initial payment was similar to the Commission's LGIA deposit. First Compliance Order, 191 FERC ¶ 61,230 at P 124.

[68] Order No. 2023, 184 FERC ¶ 61,054 at P 1578; *see also pro forma* LGIP § 7.3.

of alternative transmission technologies enumerated in Order No. 2023 during the cluster study, including any restudies, of the generator interconnection process in all instances (i.e., for all interconnection customers in a cluster), without the need for a request from an interconnection customer. The Commission required transmission providers to evaluate each alternative transmission technology listed in *pro forma* LGIP section 7.3 and to determine, in the transmission provider's sole discretion, whether it should be used, consistent with good utility practice, applicable reliability standards, and other applicable regulatory requirements. Finally, the Commission required transmission providers to include, in the *pro forma* LGIP cluster study report, an explanation of the results of the evaluation of the enumerated alternative transmission technologies for feasibility, cost, and time savings as an alternative to a traditional network upgrade.

a. First Compliance Order

41. In the First Compliance Filing, SPP proposed revisions to GIP section 8.4.1 to incorporate, with modification, the *pro forma* LGIP section 7.3 framework for the enumerated alternative transmission technologies.[69] SPP proposed, among other things, to modify language from section 7.3 of the *pro forma* LGIP—providing that transmission providers are required to include an explanation of the results of the enumerated alternative transmission technologies evaluation in the cluster study report—to instead state that SPP will include an explanation of results of its evaluation for each technology in either the DISIS Phase One or Phase Two results, as applicable, based on technology type.

42. In the First Compliance Order, the Commission found that SPP had not demonstrated that its proposed deviation in GIP section 8.4.1 was just and reasonable, not unduly discriminatory or preferential, or accomplished the purposes of Order Nos. 2023 and 2023-A.[70] The Commission found that although SPP's proposed revisions in GIP section 8.4.1 reflected that the DISIS is performed in two phases, SPP did not specify in which DISIS study phase SPP would provide such evaluation results or which technology type is applicable to each DISIS phase.[71] Accordingly, the Commission directed SPP to make a further compliance filing to revise GIP section 8.4.1 to specify which enumerated alternative transmission technologies evaluation results are reported in DISIS Phase One and DISIS Phase Two and clarify when interconnection customers will receive the

[69] First Compliance Order, 191 FERC ¶ 61,230 at P 221.

[70] *Id.* P 223.

[71] *Id.* (citing SPP Tariff, attach. V, § 8 (17.0.0), § 8.4.1 (Scope of Definitive Interconnection System Impact Study)).

evaluation results, or further justify its proposal under the independent entity variation standard.

b. Second Compliance Filing

43. SPP proposes revisions to GIP section 8.4.1 to provide that SPP will include an explanation of the results of its evaluation for each alternative transmission technology at each phase of the DISIS.[72] SPP states that this revision provides clear expectations to interconnection customers as to when they will receive results of SPP's evaluation of the alternative transmission technologies.

c. Commission Determination

44. We accept SPP's proposed independent entity variation in GIP section 8.4.1 to provide that the transmission provider will include an explanation of the results of its evaluation for each alternative transmission technology at "each phase of the DISIS."[73] We find that the proposed revision is just and reasonable, not unduly discriminatory or preferential, and accomplishes the purposes of Order Nos. 2023 and 2023-A because it specifies when the interconnection customer will receive the results of SPP's evaluation of alternative transmission technologies and clarifies that all enumerated alternative transmission technology types will be evaluated in both DISIS phases.[74]

6. Errata Notice and Other Compliance Directives

45. In the First Compliance Order, the Commission found SPP's proposed Tariff revisions to remove GIP section 5.3, regarding transitional notice requirements for generating facility replacement, to be outside the scope of the compliance proceeding.[75] Therefore, the Commission directed SPP to submit a further compliance filing to reinstate this language in its Tariff, without prejudice to SPP submitting the proposed revision in a future FPA section 205 filing.

46. In addition, the Commission explained that, on August 20, 2024, the Commission issued an Errata Notice that contained additional revisions to the Commission's

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[72] Second Compliance Filing at 16; SPP Tariff, attach. V, § 8 (19.0.2), § 8.4.1 (Scope of Definitive Interconnection System Impact Study).

[73] SPP Tariff, attach. V, § 8 (19.0.2), § 8.4.1 (Scope of Definitive Interconnection System Impact Study).

[74] First Compliance Order, 191 FERC ¶ 61,230 at P 223.

[75] *Id.* P 233.

pro forma LGIP, *pro forma* LGIA, and *pro forma* SGIA.[76] The Commission directed SPP to incorporate the revisions made in the Errata Notice when it submits its further compliance filing.

a. Second Compliance Filing

47. SPP explains that, on February 24, 2025, the Commission accepted revisions to its GIP that, among other things, deleted GIP section 5.3 from SPP's Tariff.[77] Therefore, SPP states it is not necessary for it to propose revisions to reinstate the language in GIP section 5.3 in this compliance filing.

48. SPP proposes revisions to GIP sections 9.6[78] and 13.1[79] and article 1 of its *pro forma* GIAs[80] to incorporate, without modification, revisions to the Commission's *pro forma* LGIP and *pro forma* LGIA contained in the Errata Notice. In addition, SPP submits proposed revisions to its GIP and *pro forma* GIAs to incorporate certain revisions to the Commission's *pro forma* LGIP and *pro forma* LGIA contained in the Errata Notice, with modification.[81] Specifically, SPP proposes to incorporate a grammatical correction to the Commission's *pro forma* LGIP section 3.4.2(iii) into GIP section 8.2(a)(1), which SPP explains is the corresponding section of its GIP.[82] SPP further proposes to implement revisions to *pro forma* LGIP section 3.4.5 to change "station" to "substation" into its corresponding GIP section 3.5; however, SPP does not

[76] *Id.* P 234 (citing *Improvements to Generator Interconnection Procs. & Agreements*, Errata Notice, 188 FERC ¶ 61,134) (2024) (Errata Notice)).

[77] Second Compliance Filing at 16-17 (citing *Sw. Power Pool, Inc.*, 190 FERC ¶ 61,124 (2025)).

[78] Second Compliance Filing at 19-20; SPP Tariff, attach. V, § 9 (Affected System Study) (4.0.1), § 9.6 (Scope of Affected System Study).

[79] Second Compliance Filing at 20; SPP Tariff, attach. V, § 13 (Miscellaneous) (8.1.0), § 13.1 (Confidentiality).

[80] Second Compliance Filing at 21; SPP Tariff, attach. V, app. 6 (*pro forma* GIA) (26.0.2), art. 1; *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art. 1 (Definitions), Stand Alone Network Upgrade.

[81] Second Compliance Filing at 17-23.

[82] *Id.* at 18 (citing Errata Notice, 188 FERC ¶ 61,134 at P 2); SPP Tariff, attach. V, § 8 (Definitive Planning Phase) (19.0.2), § 8.2(a)(1).

propose to revise the capitalization of "cluster study" in accordance with *pro forma* LGIP section 3.4.5 because SPP's GIP does not contain the term "cluster study."[83] Further, SPP proposes revisions to reflect the Commission's grammatical changes to article 5.1.3 of the Commission's *pro forma* LGIA in the corresponding article 5.1.2 of SPP's *pro forma* GIAs.[84]

49. In addition, SPP contends that no revisions to its GIP or *pro forma* GIAs are necessary to reflect revisions to the Commission's *pro forma* LGIP table of contents, sections 3.5.4, 3.7.1.2.3(a)(5), 3.7.1.2.3(a), 12.2.4, 13.3, 13.4, and appendix 12 or articles 1, 9.6.4, and 17.1.1 of the *pro forma* LGIA contained in the Errata Notice.[85] SPP explains that its GIP and *pro forma* GIAs either do not contain the error corrected in the Errata Notice or the revision is otherwise not applicable to SPP's GIP and *pro forma* GIAs. Finally, SPP notes that the Commission's revisions in the Errata Notice to the *pro forma* SGIA are inapplicable because SPP's Tariff does not contain an SGIP or SGIA.

b. Commission Determination

50. We agree with SPP that further Tariff revisions to reinstate GIP section 5.3 in this proceeding are no longer necessary because the Commission accepted Tariff revisions to remove the transitional notice requirements in GIP section 5.3, effective February 1, 2025.[86]

51. Further, we accept SPP's proposed revisions to GIP sections 9.6 and 13.1[87] and article 1 of its *pro forma* GIAs[88] to incorporate, without modification, revisions to the

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[83] Second Compliance Filing at 18 (citing Errata Notice, 188 FERC ¶ 61,134 at P 3); SPP Tariff, attach. V, § 3 (Interconnection Requests) (23.0.2), § 3.5.

[84] Second Compliance Filing at 22-23 (citing Errata Notice, 188 FERC ¶ 61,134 at PP 16-17); SPP Tariff, attach. V, app. 6 (*pro forma* GIA) (26.0.2); *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art 5.1.2 (Option to Build).

[85] Second Compliance Filing at 17-23.

[86] *Sw. Power Pool, Inc.*, 190 FERC ¶ 61,124.

[87] SPP Tariff, attach. V, § 9 (Affected System Study) (4.0.1), § 9.6 (Scope of Affected System Study); *id.* § 13 (Miscellaneous) (8.1.0), § 13.1 (Confidentiality).

[88] SPP Tariff, attach. V, app. 6 (*pro forma* GIA) (26.0.2), art. 1; *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.*

Commission's *pro forma* LGIP and *pro forma* LGIA contained in the Errata Notice. We also accept SPP's proposed revisions to GIP sections 3.5[89] and 8.2(a)(1),[90] as well as article 5.1.2 of SPP's *pro forma* GIAs,[91] to incorporate, with modification, revisions contained in the Errata Notice because SPP's proposal incorporates the revisions into the corresponding sections of SPP's Tariff.

52. In addition, SPP explains that certain revisions contained in the Errata Notice correct errors that do not exist in SPP's Tariff or are otherwise not applicable to its Tariff. We agree with SPP that no further revisions to its Tariff are necessary to implement the revisions to Commission's *pro forma* LGIP, *pro forma* LGIA, and *pro forma* SGIA contained in the Errata Notice.

The Commission orders:

SPP's Second Compliance Filing, as amended, is hereby accepted, effective June 26, 2025, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Debbie-Anne A. Reese,
Secretary.

app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art. 1 (Definitions), Stand Alone Network Upgrade.

[89] *Id.* attach. V, § 3 (Interconnection Requests) (23.0.2), § 3.5.

[90] *Id.* § 8 (Definitive Planning Phase) (19.0.2), § 8.2(a)(1).

[91] *Id.* attach. V, app. 6 (*pro forma* GIA) (26.0.2); *id.* app. 8 (*pro forma* Interim GIA) (23.0.2); *id.* app. 13 (*pro forma* Western-UGP GIA) (22.0.2); *id.* app. 14 (*pro forma* Western-UGP Interim GIA) (21.0.2), art 5.1.2 (Option to Build).

Appendix – Tariff Records

Southwest Power Pool, Inc.
Open Access Transmission Tariff, Sixth Revised Volume No. 1

Docket No. ER24-2026-001

- Attachment V Section 3, Attachment V Section 3 (23.0.2)
- Attachment V Section 8, Attachment V Section 8 (19.0.2)
- Attachment V Section 9, Attachment V Section 9 (4.0.1)
- Attachment V Section 11, Attachment V Section 11 (7.0.1)
- Attachment V Section 13, Attachment V Section 13 (8.1.0)
- Att. V Appendix 6, Attachment V Appendix 6 Generator Interconnection Agreement (26.0.2)
- Attachment V Appendix 8, Attachment V Appendix 8 Interim Generator Interconnection... (23.0.2)
- Attachment V Appendix 13, Attachment V Appendix 13 (22.0.2)
- Attachment V Appendix 14, Attachment V Appendix 14 (21.0.2)

Docket No. ER24-2026-002

- Attachment V Section 1, Attachment V Section 1 (18.0.3)