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December 1, 2014

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose, Secretary
Mr. Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Southern Company Services, Inc., Docket No. ER15-_____
Amendment to Attachment T of Southern Companies' Open Access Transmission
Tariff

Dear Secretary Bose:

In accordance with Section 205 of the Federal Power Act ("FPA")¹ and Part 35 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") rules and regulations,² Southern Company Services, Inc. ("SCS"), as agent for Alabama Power Company ("Alabama Power"), Georgia Power Company, Gulf Power Company, and Mississippi Power Company (collectively, "Southern Companies"), submits for filing the enclosed revisions to Attachment T of Southern Companies' Open Access Transmission Tariff (Tariff Volume No. 5) ("OATT" or "Tariff"). As discussed in more detail below, these revisions are being submitted to update the point-to-point transmission service products offered and not offered under Southern Companies' OATT in Attachment T. The enclosed OATT revisions are being filed in Alabama Power Company's database³ entitled:

OATT and Associated Service Agreements, Tariff Volume No. 5, Southern Companies OATT

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. Part 35 (2011).

³ The OATT is in Alabama Power's database because Alabama Power is the designated filer for Southern Companies' Tariff and related service agreements, including any amendments thereto. Because Georgia Power Company, Gulf Power Company and Mississippi Power Company each filed certificates of concurrence providing that they incorporated the Tariff and all future amendments thereto, no filing will be made on behalf of those companies.

I. Background and Description of Filing

Consistent with Commission precedent,⁴ Attachment T to Southern Companies' OATT identifies the point-to-point transmission service products and associated service periods set forth in the Wholesale Electric Quadrant ("WEQ") of the North American Energy Standards Board's ("NAESB") Open Access Same-Time Information Systems ("OASIS") business practice standards (WEQ-001) that are offered and those not offered by Southern Companies.⁵ Southern Companies are revising Attachment T to update the references to be consistent with the current numbering system for those standards and to move the "Sliding Daily" point-to-point transmission service product from products offered by Southern Companies to the list of products not offered by Southern Companies under the OATT. A redlined version of the revised Attachment T is attached to this transmittal letter. Because this change to Attachment T provides clarity for transmission customers regarding the point-to-point transmission service products and associated service periods that Southern Companies offer under the OATT, the proposed attachment is consistent with or superior to the *pro forma* OATT.⁶

Southern Companies note that in Order No. 676-H, the Commission required all waivers to these NAESB standards to be made by December 1, 2014.⁷ While it is not completely clear whether a request for waiver is necessary to maintain the effectiveness of Attachment T, in a separate transmittal being made concurrently to this filing, Southern Companies are, out of an abundance of caution, requesting a waiver to the extent necessary to effectuate Attachment T. To the extent the Commission deems it necessary, Southern Companies repeat that request here.

II. Effective Date and Notice Requirement

Southern Companies respectfully request the Commission make the attached revisions to the OATT effective as of December 1, 2014, the date of this filing. This date is appropriate for the Attachment T revisions because this filing provides clarity to transmission customers regarding which NAESB products Southern Companies provide associated with the provision of point-to-point

⁴ See *Cargill Power Markets, LLC v. Public Service Company of New Mexico*, 132 FERC ¶ 61, 079 at P 22 (2010) (holding that while transmission providers are not required to adopt each of the services set forth in the North American Energy Standard Board ("NAESB") business practice standards, transmission providers are required to state accurately in their OATTs which services are offered.)

⁵ See WEQ-001-2.1.1 through 2.1.14.

⁶ Concurrent with this filing, Southern Companies are submitting by separate transmittal seeking limited waiver of NAESB WEQ business practice standards. Accordingly, on this December 1, 2014, Southern Companies are making three related filings: 1) seeking limited waiver of NAESB WEQ Standards; 2) Southern Companies' compliance filing to Order No. 676-H; and 3) the filing made in this transmittal seeking to update its Attachment T.

⁷ *Standards for Business Practices and Communication Protocols for Public Utilities*, 148 FERC ¶ 61,205, P 86 (2014 ("Order No. 676-H").

transmission service. In addition, December 1, 2014, is the required filing date under Order No. 676-H⁸ to request waivers to Version 003 WEQ OASIS business practice standards, and as discussed above, such a waiver might be construed necessary for purposes of Attachment T. In addition, for the reasons stated above, Southern Companies believe that good cause exists for a waiver of any of the Commission's notice requirements set forth in 18 C.F.R. § 35.3 that the Commission believes are applicable.

III. Request for Waiver of Filing Requirements

Pursuant to 18 CFR § 35.13(a), Southern Companies are filing these changes to Attachment T of their OATT and believe they have met the applicable filing requirements. To the extent necessary, Southern Companies request a waiver of any portion of the Commission's regulations that are not satisfied by the enclosed information, including specifically any requirements set forth in 18 C.F.R. § 35.13(a) and (c)-(g).⁹

IV. List of Documents

Southern Companies provide the following materials for filing:

1. Revised Attachment T in RTF format with metadata attached;
2. Clean version of revised Attachment T in PDF format for posting in eLibrary; and
3. Redline version of revised Attachment T in PDF format for posting in eLibrary.

V. Posting

An electronic copy of this filing will be posted on Southern Companies' OASIS.

VI. Miscellaneous

Southern Company Services, Inc. is authorized under the OATT to act as agent for Alabama Power, Georgia Power Company, Gulf Power Company, Mississippi Power Company and/or the

⁸ *Id.*, at P 86.

⁹ 18 C.F.R. § 35.11; *see also, e.g., In re Wyoming Colorado Intertie, LLC*, 127 FERC ¶ 61,125 (2009) (granting waiver of filing requirements in Subpart B and C of Part 35, including section 35.13 except section 35.13(b) because the requirements were "not applicable" due to the nature of the rates charged).

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individual operating companies and provides contract administration, data processing, accounting, and other services to Alabama Power, Georgia Power Company, Gulf Power Company, and Mississippi Power Company. Should you have any questions or require additional materials or information concerning this filing, please telephone the undersigned attorney.

Sincerely,

/s/ Kevin A. McNamee

Kevin A. McNamee

Attorney for Southern Company Services, Inc.

OF COUNSEL

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ATTACHMENT T

POINT-TO-POINT TRANSMISSION SERVICE PRODUCTS

I. Point-to-Point Transmission Service Products offered by Transmission Provider.

Pursuant to the North American Electric Standards Board's ("NAESB") Wholesale Electric Quadrant's ("WEQ") OASIS Business Practice Standards, Transmission Provider offers the following point-to-point transmission service products pursuant to the provisions of Part II of Transmission Provider's Tariff. Transmission Provider's transmission service products are offered and processed in prevailing Central Time only. The references below are to Version 003 of the WEQ OASIS Business Practice Standards and are provided for convenience only. Future revision by NAESB to these references shall not affect which products are and which products are not offered by the Transmission Provider.

001-2.1.1 Fixed Hourly

The service starts at the beginning of a clock hour and stops at the end of a clock hour.

001-2.1.2 Fixed Daily

The service starts at 00:00 and stops at 24:00 of the same calendar date (same as 00:00 of the next consecutive calendar date).

001-2.1.3 Fixed Weekly

The service starts at 00:00 on Monday and stops at 24:00 of the following Sunday (same as 00:00 of the following Monday).

001-2.1.4 Fixed Monthly

The service starts at 00:00 on the first date of a calendar month and stops at 24:00 on the last date of the same calendar month (same as 00:00 of the first date of the next consecutive month).

001-2.1.5 Fixed Yearly

The service starts at 00:00 on the first date of a calendar year and ends at 24:00 on the last date of the same calendar year (same as 00:00 of the first date of the next consecutive year).

001-2.1.7 Sliding Weekly

The service starts at 00:00 of any date and stops exactly 168 hours later at 00:00 on the same day of the next week.

001-2.1.8 Sliding Monthly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the next month (28-31 days later). If there is no corresponding date in the following month, the service stops at 24:00 on the last day of the next month. For example: SLIDING

MONTHLY starting at 00:00 on January 30 would stop at 24:00 on February 28 (same as 00:00 March 1).

001-2.1.9 Sliding Yearly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year. For example, SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year. The Transmission Provider may limit the start of service to the beginning of a calendar month.

II. Point-to-Point Transmission Service Products not offered by Transmission Provider.

The Transmission Provider does not offer the following point-to-point specific transmission services products, as defined in the NAESB OASIS Business Practice Standards:

001-2.1.6 Sliding Daily

The service starts at the beginning of any hour of the day and stops exactly 24 hours later at the same time on the next day.

001-2.1.10 Extended Daily

The service starts at any hour of a day and stops more than 24 hours later and less than 168 hours later.

001-2.1.11 Extended Weekly

The service starts at 00:00 of any date and stops at 00:00 more than one week later, but less than four weeks later.

001-2.1.12 Extended Monthly

The service starts at 00:00 of any date and stops at 00:00 more than one month later, but less than twelve months later.

001-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later. The Transmission Provider may limit the service to be in increments of full years or full calendar months. The Transmission Provider may limit the start of service to the beginning of a calendar month.

001-2.1.14 Next Increment Hourly

The service starts at the beginning of the next clock hour and stops at the end of that clock hour.

Any OASIS request for a transmission service product not offered by the Transmission Provider will be invalidated and the Transmission Customer may resubmit the request in the form of any of the transmission service products offered by the Transmission Provider.

ATTACHMENT T

POINT-TO-POINT TRANSMISSION SERVICE PRODUCTS

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001-2.1.4 Fixed Monthly

The service starts at 00:00 on the first date of a calendar month and stops at 24:00 on the last date of the same calendar month (same as 00:00 of the first date of the next consecutive month).

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The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year. For example, SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year. The Transmission Provider may limit the start of service to the beginning of a calendar month.

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