**Determination in FERC Orders 845 and 845-A - Decline posting of specific congestion and curtailments information**

During the March OASIS/BPS Subcommittee meeting, it was brought to the group’s attention that FERC declined to adopt the requirements for transmission provider to post specific congestion and curtailments information.  After reviewing the relevant NOPR, Order 845 and Order 845-A, my observation is that the decision in Order Nos. 845 and 845-A does not conflict with the OASIS/BPS Subcommittee’s work on drafting the recommendation for posting of additional curtailment information under paragraph 1627 of Order 890.

In **Order Nos 845**  and **845-A,** the Commission declined to adopt the requirements for transmission provider to post specific congestion and curtailments for the interconnection customers proposed  in NORP (Docket No. RM17-8-000 issued in December 15, 2016) and subsequently denied request for rehearing.  The commission recognized that many transmission providers have published congestion and curtailments data on their websites for their transmission customer; also information of the Eastern Interconnection on duration, direction and MW total curtailments is available from the NERC TLR logs.

Followings are some excerpts from the NOPR and the FERC Orders that provide clarifications of the original intent and reason for the final FERC decision to decline the proposed reform in the NOPR:

**NOPR Docket No. RM17-8-000 December 15, 2016**

**Congestion and Curtailment Information**

**128.**  The commission preliminarily finds that improving access to congestion and curtailment data may allow interconnection customers to more accurately assess curtailment risks at different locations on the system. As a result, interconnection customers may be better able to assess the value of requesting ERIS relative to NRIS and may be better able to choose where to site their generation facilities.

**129.**       Improving access to curtailment and congestion data could reduce uncertainties associated with as-available service, as well as better inform interconnection customer of the risks surround as-available transmission service.

**130.**       …This proposed reform aims to increase transparency regarding congestion and curtailment risks at various points in the transmission system that could help interconnection customers identify interconnection locations in less congested areas.  To effectuate the proposal1, the Commission proposed to revised section 37.6 of the Code of Federal Regulations to add new section (1) as follows:

(1) *Posting of congestion and curtailment data.* The transmission Provider must post on OASIS information as to congestion data representing (i) total hours of curtailment on all interfaces, (ii) total hours of Transmission Provider-ordered generation curtailment and transmission service curtailment due to congestion on that facility or interface, (iii) the cause of the congestion (e.g., a contingency or an outage), and (iv) total megawatt hours of curtailment due to lack of transmission for that month.  This data shall be posted on a monthly basis by the 15th day of the following month and shall be posted in one location on the OASIS.  The Transmission Provider should maintain this data for a minimum of three years.

**Order No. 845** **issued April 19, 2018**

**268.**       In this Final Rule, we decline to adopt the proposal in the NORP to require transmission providers to post certain specified congestion and curtailment information, as described further below.

**269.**       We agree with commenters that access to congestion and curtailment data could better inform the decision-making of interconnection customers and allow them to more appropriately size and site projects, resulting in more efficient use of the transmission system and fewer late stage queue withdrawals.  Accordingly, we encourage all transmission providers that already make such information available to continue to do so.

**270.**       …we decline to require transmission providers to post the specific information that the Commission originally proposed in the NOPR.

**271.**       …many transmission providers already publish congestion and curtailment data such as LMP data and dispatch reports on their public websites.  Further, the NERC Transmission Loading Relief(TLR) Logs make publicly available information on the duration, direction, and MW total of curtailments in the Eastern Interconnection. <https://nerc.com/pa/rrm/TLR/Pages/TLR-Logs.aspx>

**272.**       Accordingly, we decline to adopt the proposed revisions to add a new section (1) to 18 CFR section 37.6 that would require transmission providers to post specific congestion and curtailment information in one location on OASIS.

**Order No. 845-A** **issued February 21, 2019**

**92.**         We deny Generation Developer’s request for rehearing.  First, we reiterate that many transmission providers already publish some congestion and curtailment data such as locational marginal price data and dispatch reports.  Further, we again note that a significant amount of publicly available information for the Eastern Interconnection is contained in the NERC Transmission Loading Relief (TLR) Logs, including the duration, direction and MW of curtailment.  WE also note that multiple commenters made a credible argument that imposing the proposed requirements would not provide information that would be useful for interconnection customer. … The commission decided not to proceed with its proposal in light of the limited usefulness, difficulty, and technical infeasibility of complying with the proposed requirements.