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March 10, 2011

Via Electronic Filing

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Southern Company Services, Inc., Docket Nos. ER11-____; ER11-2477-000
Filing of Updated Depreciation Rates for Gulf Power Company**

Dear Secretary Bose:

In compliance with the Commission's order dated February 16, 2011 in the above-captioned docket,¹ Southern Company Services, Inc. ("SCS"), as agent for Gulf Power Company ("Gulf Power"), hereby submits for filing a new Attachment S to Southern Companies' Open Access Transmission Tariff (Tariff Volume No. 5) ("Southern Companies' OATT"). The enclosed Attachment S is being filed in Alabama Power Company's database entitled:

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

Background

On December 21, 2010, SCS, acting as agent for Gulf Power and in accordance with Section 205 of the Federal Power Act and Order No. 618, submitted a request to the Commission for authorization to use Gulf Power's updated depreciation rates in the calculation of charges for services provided pursuant to certain jurisdictional contracts and rate schedules, effective January 1, 2010. In the February 16 Order, the Commission accepted SCS's filing, subject to SCS making a compliance filing through the Commission's eTariff system to include in the affected contracts and rate schedules a Tariff Record containing the depreciation rates that were proposed for use by SCS and conditionally accepted by the Commission.

¹ *Southern Co. Servs. & Gulf Power Co.*, Docket No. ER11-2477-000, Letter Order (Feb. 16, 2011) ("February 16 Order").

Description of the Filing

In compliance with the February 16 Order and pursuant to Order No. 714 and section 35.7 of the Commission's regulations, SCS submits a new Attachment S to the Southern Companies' OATT. This new Attachment S sets forth the updated depreciation rates of Gulf Power that were conditionally accepted by the Commission. This new Attachment S to Southern Companies' OATT is being submitted in Alabama Power Company's database because it is the designated filer for Southern Companies' OATT, including any amendments thereto.² In addition, SCS hereby submits a revised Table of Contents to Southern Companies' OATT to incorporate the new Attachment S.

In accordance with the February 16 Order, the effective date of the updated depreciation rates is **January 1, 2010**. However, the software characteristics of the Commission's eTariff system do not permit a filing with a proposed effective date earlier than the date of the baseline filing. As such, the metadata in the filing for Attachment S will reflect an effective date of September 22, 2010, the effective date of the baseline tariff. Nonetheless, SCS understands that the proposed effective date contained in the metadata for Attachment S will not impact the actual effective date for the updated depreciation rates, as approved by the Commission, which is **January 1, 2010**. In addition to the Southern Companies' OATT, other jurisdictional contracts were the subject of SCS's December 21 filing and the February 16 Order. Those contracts have not yet been filed in the eTariff system; accordingly, compliance as to those contracts is being handled through separate filings – notice of which will be filed in Docket No. ER11-2477 upon completion. In addition, pursuant to 18 C.F.R. § 35.11, to the extent necessary, SCS requests waiver of the Commission's notice requirements set forth in 18 C.F.R. § 35.3. To the extent any other applicable requirements are not satisfied by this filing, SCS respectfully requests waiver thereof.

List of Documents

SCS provides the following materials for filing:

1. A copy of this transmittal letter in PDF format;
2. Attachment S to Southern Companies' OATT in RTF format with metadata attached;

² On September 22, 2010, Alabama Power Company submitted its baseline eTariff filing in FERC Docket No. ER10-2851. On November 18, 2010, the Commission accepted the baseline eTariff filing, with an effective date of September 22, 2010. Gulf Power Company (FERC Docket No. ER10-2857) filed a certificate of concurrence providing that it incorporated Southern Companies' OATT and all future amendments thereto. Because Gulf Power's certificate of concurrence incorporated all future OATT amendments, no filing will be made on behalf of Gulf Power.

Ms. Kimberly D. Bose
March 10, 2011
Page 3

3. The Table of Contents to Southern Companies' OATT in RTF format with metadata attached;
4. A clean copy of Attachment S and the Table of Contents to Southern Companies' OATT in PDF format for publishing in eLibrary; and
5. A redline copy of the Table of Contents to Southern Companies' OATT in PDF format for publishing in eLibrary.

Conclusion

SCS respectfully requests that the Commission accept this filing as being in compliance with the conditions of the February 16 Order. If there are any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Scott B. Grover
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Attorney for Southern Companies

Ms. Kimberly D. Bose
March 10, 2011
Page 4

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Network Integration Transmission Service Customers (via e-mail)

Long-Term Firm Point-to-Point Transmission Customers (via e-mail)

Conditional Long Term Firm Point-to-Point Transmission Customers (via e-mail)³

³ A copy of this filing also will be posted on Southern Companies' OASIS.

TABLE OF CONTENTS

I. COMMON SERVICE PROVISIONS

1 Definitions

- 1.1 Affiliate
- 1.2 Ancillary Services
- 1.3 Annual Transmission Costs
- 1.4 Application
- 1.5 [Reserved]
- 1.6 Commission
- 1.7 Completed Application
- 1.8 Control Area
- 1.9 Curtailment
- 1.10 Delivering Party
- 1.11 Designated Agent
- 1.12 Direct Assignment Facilities
- 1.13 Eligible Customer
- 1.14 Facilities Study
- 1.15 Firm Point-To-Point Transmission Service
- 1.16 Good Utility Practice
- 1.17 Interruption
- 1.18 Load Ratio Share
- 1.19 Load Shedding
- 1.20A Long-Term Firm Point-To-Point Transmission Service
- 1.20B Recallable Long-Term Firm Point-To-Point Transmission Service
- 1.21 Native Load Customers
- 1.22 Network Customer
- 1.23 Network Integration Transmission Service
- 1.24 Network Load
- 1.25 Network Operating Agreement
- 1.26 Network Operating Committee
- 1.27 Network Resource
- 1.28 Network Upgrades
- 1.29 Non-Firm Point-To-Point Transmission Service
- 1.30 Non-Firm Sale
- 1.31 Open Access Same-Time Information System (OASIS)
- 1.32 Part I
- 1.33 Part II
- 1.34 Part III
- 1.35 Parties
- 1.36 Point(s) of Delivery
- 1.37 Point(s) of Receipt
- 1.38 Point-To-Point Transmission Service
- 1.39 Power Purchaser
- 1.40 Pre-Confirmed Application
- 1.41 Receiving Party
- 1.42 Regional Transmission Group (RTG)
- 1.43 Reserved Capacity
- 1.44 Service Agreement
- 1.45 Service Commencement Date

- 1.46 Short-Term Firm Point-To-Point Transmission Service
- 1.47 Stakeholder
- 1.48 System Condition
- 1.49 System Impact Study
- 1.50 Third-Party Sale
- 1.51 Transmission Customer
- 1.52 Transmission Provider
- 1.53 Transmission Provider's Monthly Transmission System Peak
- 1.54 Transmission Service
- 1.55 Transmission System
- 2 Initial Allocation and Renewal Procedures
 - 2.1 Initial Allocation of Available Transfer Capability
 - 2.2 Reservation Priority For Existing Firm Service Customers
- 3 Ancillary Services
 - 3.1 Scheduling, System Control and Dispatch Service
 - 3.2 Reactive Supply and Voltage Control from Generation or Other Sources Service
 - 3.3 Regulation and Frequency Response Service
 - 3.4 Energy Imbalance Service
 - 3.5 Operating Reserve - Spinning Reserve Service
 - 3.6 Operating Reserve - Supplemental Reserve Service
 - 3.7 Generator Imbalance Service
- 4 Open Access Same-Time Information System (OASIS)
- 5 Local Furnishing Bonds
 - 5.1 Transmission Providers That Own Facilities Financed by Local Furnishing Bonds
 - 5.2 Alternative Procedures for Requesting Transmission Service
- 6 Reciprocity
- 7 Billing and Payment
 - 7.1 Billing Procedure
 - 7.2 Interest on Unpaid Balances
 - 7.3 Customer Default
- 8 Accounting for the Transmission Provider's Use of the Tariff
 - 8.1 Transmission Revenues
 - 8.2 Study Costs and Revenues
- 9 Regulatory Filings
- 10 Force Majeure and Indemnification
 - 10.1 Force Majeure
 - 10.2 Indemnification
- 11 Creditworthiness
- 12 Dispute Resolution Procedures
 - 12.1 Internal Dispute Resolution Procedures
 - 12.2 External Arbitration Procedures
 - 12.3 Arbitration Decisions
 - 12.4 Costs
 - 12.5 Rights Under The Federal Power Act

II. POINT-TO-POINT TRANSMISSION SERVICE

Preamble

- 13 Nature of Firm Point-To-Point Transmission Service
 - 13.1 Term
 - 13.2 Reservation Priority
 - 13.3 Use of Firm Transmission Service by the Transmission Provider
 - 13.4 Service Agreements
 - 13.5 Transmission Customer Obligations for Facility Additions or Redispatch Costs
 - 13.6 Curtailment of Firm Transmission Service
 - 13.7 Classification of Firm Transmission Service
 - 13.8 Scheduling of Firm Point-To-Point Transmission Service

- 14 Nature of Non-Firm Point-To-Point Transmission Service
 - 14.1 Term
 - 14.2 Reservation Priority
 - 14.3 Use of Non-Firm Point-To-Point Transmission Service by the Transmission Provider
 - 14.4 Service Agreements
 - 14.5 Classification of Non-Firm Point-To-Point Transmission Service
 - 14.6 Scheduling of Non-Firm Point-To-Point Transmission Service
 - 14.7 Curtailment or Interruption of Service

- 15 Service Availability
 - 15.1 General Conditions
 - 15.2 Determination of Available Transfer Capability
 - 15.3 Initiating Service in the Absence of an Executed Service Agreement
 - 15.4 Obligation to Provide Transmission Service that Requires Expansion or Modification of the Transmission System, Redispatch or Conditional Curtailment
 - 15.5 Deferral of Service
 - 15.6 Other Transmission Service Schedules
 - 15.7 Real Power Losses

- 16 Transmission Customer Responsibilities
 - 16.1 Conditions Required of Transmission Customers
 - 16.2 Transmission Customer Responsibility for Third-Party Arrangements

- 17 Procedures for Arranging Firm Point-To-Point Transmission Service
 - 17.1 Application
 - 17.2 Completed Application
 - 17.3 Deposit
 - 17.4 Notice of Deficient Application
 - 17.5 Response to a Completed Application
 - 17.6 Execution of Service Agreement
 - 17.7 Extensions for Commencement of Service

18	Procedures for Arranging Non-Firm Point-To-Point Transmission Service
18.1	Application
18.2	Completed Application
18.3	Reservation of Non-Firm Point-To-Point Transmission Service
18.4	Determination of Available Transfer Capability
19	Additional Study Procedures For Firm Point-To-Point Transmission Service Requests
19.1	Notice of Need for System Impact Study
19.2	System Impact Study Agreement and Cost Reimbursement
19.3	System Impact Study Procedures
19.4	Facilities Study Procedures
19.5	Clustering of Service Requests
19.6	Facilities Study Modifications
19.7	Due Diligence in Completing New Facilities
19.8	Partial Interim Service
19.9	Expedited Procedures for New Facilities
19.10	Penalties for Failure to Meet Study Deadlines
20	Procedures if The Transmission Provider is Unable to Complete New Transmission Facilities for Firm Point-To-Point Transmission Service
20.1	Delays in Construction of New Facilities
20.2	Alternatives to the Original Facility Additions
20.3	Refund Obligation for Unfinished Facility Additions
21	Provisions Relating to Transmission Construction and Services on the Systems of Other Utilities
21.1	Responsibility for Third-Party System Additions
21.2	Coordination of Third-Party System Additions
22	Changes in Service Specifications
22.1	Modifications On a Non-Firm Basis
22.2	Modification On a Firm Basis
23	Sale or Assignment of Transmission Service
23.1	Procedures for Assignment or Transfer of Service
23.2	Limitations on Assignment or Transfer of Service
23.3	Information on Assignment or Transfer of Service
24	Metering and Power Factor Correction at Receipt and Delivery Point(s)
24.1	Transmission Customer Obligations
24.2	Transmission Provider Access to Metering Data
24.3	Power Factor
25	Compensation for Transmission Service
26	Stranded Cost Recovery
27	Compensation for New Facilities and Redispatch Costs
III.	<u>NETWORK INTEGRATION TRANSMISSION SERVICE</u>
	Preamble
28	Nature of Network Integration Transmission Service
28.1	Scope of Service

- 28.2 Transmission Provider Responsibilities
- 28.3 Network Integration Transmission Service
- 28.4 Secondary Service
- 28.5 Real Power Losses
- 28.6 Restrictions on Use of Service

- 29 Initiating Service
 - 29.1 Condition Precedent for Receiving Service
 - 29.2 Application Procedures
 - 29.3 Technical Arrangements to be Completed Prior to Commencement of Service
 - 29.4 Network Customer Facilities
 - 29.5 Filing of Service Agreement

- 30 Network Resources
 - 30.1 Designation of Network Resources
 - 30.2 Designation of New Network Resources
 - 30.3 Termination of Network Resources
 - 30.4 Operation of Network Resources
 - 30.5 Network Customer Redispatch Obligation
 - 30.6 Transmission Arrangements for Network Resources Not Physically Interconnected With The Transmission Provider
 - 30.7 Limitation on Designation of Network Resources
 - 30.8 Use of Interface Capacity by the Network Customer
 - 30.9 Network Customer Owned Transmission Facilities

- 31 Designation of Network Load
 - 31.1 Network Load
 - 31.2 New Network Loads Connected With the Transmission Provider
 - 31.3 Network Load Not Physically Interconnected with the Transmission Provider
 - 31.4 New Interconnection Points
 - 31.5 Changes in Service Requests
 - 31.6 Annual Load and Resource Information Updates

- 32 Additional Study Procedures For Network Integration Transmission Service Requests
 - 32.1 Notice of Need for System Impact Study
 - 32.2 System Impact Study Agreement and Cost Reimbursement
 - 32.3 System Impact Study Procedures
 - 32.4 Facilities Study Procedures
 - 32.5 Clustering of Service Requests
 - 32.6 Penalties for Failure to Meet Study Deadlines

- 33 Load Shedding and Curtailments
 - 33.1 Procedures
 - 33.2 Transmission Constraints
 - 33.3 Cost Responsibility for Relieving Transmission Constraints
 - 33.4 Curtailments of Scheduled Deliveries
 - 33.5 Allocation of Curtailments
 - 33.6 Load Shedding
 - 33.7 System Reliability

- 34 Rates and Charges
 - 34.1 Monthly Demand Charge
 - 34.2 Determination of Network Customer's Monthly Network Load
 - 34.3 Determination of Transmission Provider's Monthly Transmission System Load
 - 34.4 Redispatch Charge
 - 34.5 Stranded Cost Recovery
- 35 Operating Arrangements
 - 35.1 Operation under The Network Operating Agreement
 - 35.2 Network Operating Agreement
 - 35.3 Network Operating Committee

SCHEDULE 1

Scheduling, System Control and Dispatch Service

SCHEDULE 2

Reactive Supply and Voltage Control from Generation or Other Sources Service

SCHEDULE 3

Regulation and Frequency Response Service

SCHEDULE 4

Energy Imbalance Service

SCHEDULE 5

Operating Reserve - Spinning Reserve Service

SCHEDULE 6

Operating Reserve - Supplemental Reserve Service

SCHEDULE 7A

Long-Term Firm and Short-Term Firm Point-To-Point Transmission Service

SCHEDULE 7B

Recallable Long-Term Firm Point-To-Point Transmission Service

SCHEDULE 8

Non-Firm Point-To-Point Transmission Service

SCHEDULE 9

Example of Transmission Loss Calculations Under Southern Companies' Tariff

SCHEDULE 10

Generator Imbalance Service

ATTACHMENT A

Form Of Service Agreement For Short-Term Firm Point-To-Point Transmission Service, Long-Term Firm Point-To-Point Transmission Service, and Recallable Long-Term Firm Point-To-Point Transmission Service

ATTACHMENT A-1

Form of Service Agreement for the Resale, Reassignment or Transfer of
Point-To-Point Transmission Service

ATTACHMENT B

Form Of Service Agreement For Non-Firm Point-To-Point Transmission Service

ATTACHMENT C

Methodology To Assess Available Transfer Capability

ATTACHMENT D

Methodology for Completing a System Impact Study

ATTACHMENT E

[Reserved]

ATTACHMENT F

Form of Service Agreement For Network Integration Transmission Service

ATTACHMENT G

Form of Network Operating Agreement

ATTACHMENT H

Network Integration Transmission Service

ATTACHMENT I

[Reserved]

ATTACHMENT J

Standard Large Generator Interconnection Procedures (LGIP)

Standard Large Generator Interconnection Agreement (LGIA)

ATTACHMENT J-1

Study Procedure for Network Resource Interconnection Service

ATTACHMENT J-2

Small Generator Interconnection Procedures (SGIP)

Small Generator Interconnection Agreement (SGIA)

ATTACHMENT K

The Southeastern Regional Transmission Planning Process

ATTACHMENT L

Source and Sink Requirements for Point-to-Point Transmission Service

ATTACHMENT M

Formula Rate Manual

EXHIBIT A

FORM OF INFORMATIONAL SCHEDULE A

EXHIBIT B

FORM OF INFORMATIONAL SCHEDULE B

EXHIBIT C

FORM OF INFORMATIONAL SCHEDULE C

EXHIBIT D

FORM OF INFORMATIONAL SCHEDULE D

ATTACHMENT N

Formula Rate Data Input Update and True-Up Procedures

ATTACHMENT O

Incorporation of North American Energy Standards Board Business Practices

ATTACHMENT P

Procedures for Addressing Parallel Flows

ATTACHMENT Q

Creditworthiness Procedures

ATTACHMENT R

Form of Service Agreement for Tariff Schedule 10 – Generator Imbalance Service

ATTACHMENT S

Depreciation and Amortization Rates

ATTACHMENT S

Depreciation and Amortization Rates

Gulf Power Company*

Category/ FERC Account No.	Rate of Depreciation (%)
Steam Production Plant	
Plant Daniel	2.80%
Plant Crist	3.50%
Plant Scholz	4.10%
Plant Smith	3.30%
Plant Scherer	2.00%
Plant Daniel Easements	1.40%
Plant Crist Easements	3.40%
Plant Daniel Rail Tracks	1.50%
Smith Other Production	
341	3.60%
342	3.60%
343	3.60%
344	3.60%
345	3.60%
346	3.60%
Pace (Pea Ridge) Other Production	
343	5.30%
344	5.30%
345	5.30%
346	5.30%
Smith #3 Other Production	
341	2.80%
342	2.80%
343	2.80%
344	2.80%
345	2.80%
346	2.80%
Transmission Plant	
350.2	1.60%

* Authorized for use effective January 1, 2010 in FERC Docket ER11-2477.

352	2.00%
353	2.30%
354	2.30%
355	3.60%
356	2.50%
358	2.10%
359	2.00%

Distribution Plant

360	1.80%
361	2.20%
362	2.20%
364	5.00%
365	3.10%
366	1.30%
367	3.30%
368	4.00%
369.1	3.80%
369.2	2.60%
369.3	4 YR recovery
370	2.70%
373	5.00%

General Plant

390	2.30%
392.1	N/A
392.2	9.30%
392.3	7.90%
392.4	4.80%
396	4.70%
397	6.30%
391	5 yr amort
391	7 yr amort
392.8	5 yr amort
393	7 yr amort
394	7 yr amort
395	7 yr amort
397	7 yr amort
398	7 yr amort

TABLE OF CONTENTS

I. COMMON SERVICE PROVISIONS

1 Definitions

- 1.1 Affiliate
- 1.2 Ancillary Services
- 1.3 Annual Transmission Costs
- 1.4 Application
- 1.5 [Reserved]
- 1.6 Commission
- 1.7 Completed Application
- 1.8 Control Area
- 1.9 Curtailment
- 1.10 Delivering Party
- 1.11 Designated Agent
- 1.12 Direct Assignment Facilities
- 1.13 Eligible Customer
- 1.14 Facilities Study
- 1.15 Firm Point-To-Point Transmission Service
- 1.16 Good Utility Practice
- 1.17 Interruption
- 1.18 Load Ratio Share
- 1.19 Load Shedding
- 1.20A Long-Term Firm Point-To-Point Transmission Service
- 1.20B Recallable Long-Term Firm Point-To-Point Transmission Service
- 1.21 Native Load Customers
- 1.22 Network Customer
- 1.23 Network Integration Transmission Service
- 1.24 Network Load
- 1.25 Network Operating Agreement
- 1.26 Network Operating Committee
- 1.27 Network Resource
- 1.28 Network Upgrades
- 1.29 Non-Firm Point-To-Point Transmission Service
- 1.30 Non-Firm Sale
- 1.31 Open Access Same-Time Information System (OASIS)
- 1.32 Part I
- 1.33 Part II
- 1.34 Part III
- 1.35 Parties
- 1.36 Point(s) of Delivery
- 1.37 Point(s) of Receipt
- 1.38 Point-To-Point Transmission Service
- 1.39 Power Purchaser
- 1.40 Pre-Confirmed Application
- 1.41 Receiving Party
- 1.42 Regional Transmission Group (RTG)
- 1.43 Reserved Capacity
- 1.44 Service Agreement
- 1.45 Service Commencement Date

- 1.46 Short-Term Firm Point-To-Point Transmission Service
- 1.47 Stakeholder
- 1.48 System Condition
- 1.49 System Impact Study
- 1.50 Third-Party Sale
- 1.51 Transmission Customer
- 1.52 Transmission Provider
- 1.53 Transmission Provider's Monthly Transmission System Peak
- 1.54 Transmission Service
- 1.55 Transmission System
- 2 Initial Allocation and Renewal Procedures
 - 2.1 Initial Allocation of Available Transfer Capability
 - 2.2 Reservation Priority For Existing Firm Service Customers
- 3 Ancillary Services
 - 3.1 Scheduling, System Control and Dispatch Service
 - 3.2 Reactive Supply and Voltage Control from Generation or Other Sources Service
 - 3.3 Regulation and Frequency Response Service
 - 3.4 Energy Imbalance Service
 - 3.5 Operating Reserve - Spinning Reserve Service
 - 3.6 Operating Reserve - Supplemental Reserve Service
 - 3.7 Generator Imbalance Service
- 4 Open Access Same-Time Information System (OASIS)
- 5 Local Furnishing Bonds
 - 5.1 Transmission Providers That Own Facilities Financed by Local Furnishing Bonds
 - 5.2 Alternative Procedures for Requesting Transmission Service
- 6 Reciprocity
- 7 Billing and Payment
 - 7.1 Billing Procedure
 - 7.2 Interest on Unpaid Balances
 - 7.3 Customer Default
- 8 Accounting for the Transmission Provider's Use of the Tariff
 - 8.1 Transmission Revenues
 - 8.2 Study Costs and Revenues
- 9 Regulatory Filings
- 10 Force Majeure and Indemnification
 - 10.1 Force Majeure
 - 10.2 Indemnification
- 11 Creditworthiness
- 12 Dispute Resolution Procedures
 - 12.1 Internal Dispute Resolution Procedures
 - 12.2 External Arbitration Procedures
 - 12.3 Arbitration Decisions
 - 12.4 Costs
 - 12.5 Rights Under The Federal Power Act

II. POINT-TO-POINT TRANSMISSION SERVICE

Preamble

- 13 Nature of Firm Point-To-Point Transmission Service
 - 13.1 Term
 - 13.2 Reservation Priority
 - 13.3 Use of Firm Transmission Service by the Transmission Provider
 - 13.4 Service Agreements
 - 13.5 Transmission Customer Obligations for Facility Additions or Redispatch Costs
 - 13.6 Curtailment of Firm Transmission Service
 - 13.7 Classification of Firm Transmission Service
 - 13.8 Scheduling of Firm Point-To-Point Transmission Service

- 14 Nature of Non-Firm Point-To-Point Transmission Service
 - 14.1 Term
 - 14.2 Reservation Priority
 - 14.3 Use of Non-Firm Point-To-Point Transmission Service by the Transmission Provider
 - 14.4 Service Agreements
 - 14.5 Classification of Non-Firm Point-To-Point Transmission Service
 - 14.6 Scheduling of Non-Firm Point-To-Point Transmission Service
 - 14.7 Curtailment or Interruption of Service

- 15 Service Availability
 - 15.1 General Conditions
 - 15.2 Determination of Available Transfer Capability
 - 15.3 Initiating Service in the Absence of an Executed Service Agreement
 - 15.4 Obligation to Provide Transmission Service that Requires Expansion or Modification of the Transmission System, Redispatch or Conditional Curtailment
 - 15.5 Deferral of Service
 - 15.6 Other Transmission Service Schedules
 - 15.7 Real Power Losses

- 16 Transmission Customer Responsibilities
 - 16.1 Conditions Required of Transmission Customers
 - 16.2 Transmission Customer Responsibility for Third-Party Arrangements

- 17 Procedures for Arranging Firm Point-To-Point Transmission Service
 - 17.1 Application
 - 17.2 Completed Application
 - 17.3 Deposit
 - 17.4 Notice of Deficient Application
 - 17.5 Response to a Completed Application
 - 17.6 Execution of Service Agreement
 - 17.7 Extensions for Commencement of Service

- 18 Procedures for Arranging Non-Firm Point-To-Point Transmission Service
 - 18.1 Application
 - 18.2 Completed Application
 - 18.3 Reservation of Non-Firm Point-To-Point Transmission Service
 - 18.4 Determination of Available Transfer Capability
 - 19 Additional Study Procedures For Firm Point-To-Point Transmission Service Requests
 - 19.1 Notice of Need for System Impact Study
 - 19.2 System Impact Study Agreement and Cost Reimbursement
 - 19.3 System Impact Study Procedures
 - 19.4 Facilities Study Procedures
 - 19.5 Clustering of Service Requests
 - 19.6 Facilities Study Modifications
 - 19.7 Due Diligence in Completing New Facilities
 - 19.8 Partial Interim Service
 - 19.9 Expedited Procedures for New Facilities
 - 19.10 Penalties for Failure to Meet Study Deadlines
 - 20 Procedures if The Transmission Provider is Unable to Complete New Transmission Facilities for Firm Point-To-Point Transmission Service
 - 20.1 Delays in Construction of New Facilities
 - 20.2 Alternatives to the Original Facility Additions
 - 20.3 Refund Obligation for Unfinished Facility Additions
 - 21 Provisions Relating to Transmission Construction and Services on the Systems of Other Utilities
 - 21.1 Responsibility for Third-Party System Additions
 - 21.2 Coordination of Third-Party System Additions
 - 22 Changes in Service Specifications
 - 22.1 Modifications On a Non-Firm Basis
 - 22.2 Modification On a Firm Basis
 - 23 Sale or Assignment of Transmission Service
 - 23.1 Procedures for Assignment or Transfer of Service
 - 23.2 Limitations on Assignment or Transfer of Service
 - 23.3 Information on Assignment or Transfer of Service
 - 24 Metering and Power Factor Correction at Receipt and Delivery Point(s)
 - 24.1 Transmission Customer Obligations
 - 24.2 Transmission Provider Access to Metering Data
 - 24.3 Power Factor
 - 25 Compensation for Transmission Service
 - 26 Stranded Cost Recovery
 - 27 Compensation for New Facilities and Redispatch Costs
- III. NETWORK INTEGRATION TRANSMISSION SERVICE
- Preamble
- 28 Nature of Network Integration Transmission Service
 - 28.1 Scope of Service

- 28.2 Transmission Provider Responsibilities
- 28.3 Network Integration Transmission Service
- 28.4 Secondary Service
- 28.5 Real Power Losses
- 28.6 Restrictions on Use of Service

- 29 Initiating Service
 - 29.1 Condition Precedent for Receiving Service
 - 29.2 Application Procedures
 - 29.3 Technical Arrangements to be Completed Prior to Commencement of Service
 - 29.4 Network Customer Facilities
 - 29.5 Filing of Service Agreement

- 30 Network Resources
 - 30.1 Designation of Network Resources
 - 30.2 Designation of New Network Resources
 - 30.3 Termination of Network Resources
 - 30.4 Operation of Network Resources
 - 30.5 Network Customer Redispatch Obligation
 - 30.6 Transmission Arrangements for Network Resources Not Physically Interconnected With The Transmission Provider
 - 30.7 Limitation on Designation of Network Resources
 - 30.8 Use of Interface Capacity by the Network Customer
 - 30.9 Network Customer Owned Transmission Facilities

- 31 Designation of Network Load
 - 31.1 Network Load
 - 31.2 New Network Loads Connected With the Transmission Provider
 - 31.3 Network Load Not Physically Interconnected with the Transmission Provider
 - 31.4 New Interconnection Points
 - 31.5 Changes in Service Requests
 - 31.6 Annual Load and Resource Information Updates

- 32 Additional Study Procedures For Network Integration Transmission Service Requests
 - 32.1 Notice of Need for System Impact Study
 - 32.2 System Impact Study Agreement and Cost Reimbursement
 - 32.3 System Impact Study Procedures
 - 32.4 Facilities Study Procedures
 - 32.5 Clustering of Service Requests
 - 32.6 Penalties for Failure to Meet Study Deadlines

- 33 Load Shedding and Curtailments
 - 33.1 Procedures
 - 33.2 Transmission Constraints
 - 33.3 Cost Responsibility for Relieving Transmission Constraints
 - 33.4 Curtailments of Scheduled Deliveries
 - 33.5 Allocation of Curtailments
 - 33.6 Load Shedding
 - 33.7 System Reliability

- 34 Rates and Charges
 - 34.1 Monthly Demand Charge
 - 34.2 Determination of Network Customer's Monthly Network Load
 - 34.3 Determination of Transmission Provider's Monthly Transmission System Load
 - 34.4 Redispatch Charge
 - 34.5 Stranded Cost Recovery
- 35 Operating Arrangements
 - 35.1 Operation under The Network Operating Agreement
 - 35.2 Network Operating Agreement
 - 35.3 Network Operating Committee

SCHEDULE 1

Scheduling, System Control and Dispatch Service

SCHEDULE 2

Reactive Supply and Voltage Control from Generation or Other Sources Service

SCHEDULE 3

Regulation and Frequency Response Service

SCHEDULE 4

Energy Imbalance Service

SCHEDULE 5

Operating Reserve - Spinning Reserve Service

SCHEDULE 6

Operating Reserve - Supplemental Reserve Service

SCHEDULE 7A

Long-Term Firm and Short-Term Firm Point-To-Point Transmission Service

SCHEDULE 7B

Recallable Long-Term Firm Point-To-Point Transmission Service

SCHEDULE 8

Non-Firm Point-To-Point Transmission Service

SCHEDULE 9

Example of Transmission Loss Calculations Under Southern Companies' Tariff

SCHEDULE 10

Generator Imbalance Service

ATTACHMENT A

Form Of Service Agreement For Short-Term Firm Point-To-Point Transmission Service, Long-Term Firm Point-To-Point Transmission Service, and Recallable Long-Term Firm Point-To-Point Transmission Service

ATTACHMENT A-1

Form of Service Agreement for the Resale, Reassignment or Transfer of
Point-To-Point Transmission Service

ATTACHMENT B

Form Of Service Agreement For Non-Firm Point-To-Point Transmission Service

ATTACHMENT C

Methodology To Assess Available Transfer Capability

ATTACHMENT D

Methodology for Completing a System Impact Study

ATTACHMENT E

[Reserved]

ATTACHMENT F

Form of Service Agreement For Network Integration Transmission Service

ATTACHMENT G

Form of Network Operating Agreement

ATTACHMENT H

Network Integration Transmission Service

ATTACHMENT I

[Reserved]

ATTACHMENT J

Standard Large Generator Interconnection Procedures (LGIP)

Standard Large Generator Interconnection Agreement (LGIA)

ATTACHMENT J-1

Study Procedure for Network Resource Interconnection Service

ATTACHMENT J-2

Small Generator Interconnection Procedures (SGIP)

Small Generator Interconnection Agreement (SGIA)

ATTACHMENT K

The Southeastern Regional Transmission Planning Process

ATTACHMENT L

Source and Sink Requirements for Point-to-Point Transmission Service

ATTACHMENT M

Formula Rate Manual

EXHIBIT A

FORM OF INFORMATIONAL SCHEDULE A

EXHIBIT B

FORM OF INFORMATIONAL SCHEDULE B

EXHIBIT C

FORM OF INFORMATIONAL SCHEDULE C

EXHIBIT D

FORM OF INFORMATIONAL SCHEDULE D

ATTACHMENT N

Formula Rate Data Input Update and True-Up Procedures

ATTACHMENT O

Incorporation of North American Energy Standards Board Business Practices

ATTACHMENT P

Procedures for Addressing Parallel Flows

ATTACHMENT Q

Creditworthiness Procedures

ATTACHMENT R

Form of Service Agreement for Tariff Schedule 10 – Generator Imbalance Service

[ATTACHMENT S](#)

[Depreciation and Amortization Rates](#)