



1800 Larimer Street
Denver, CO 80202

July 14, 2023

VIA ELECTRONIC FILING

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

**Re: *Public Service Company of Colorado*
Compliance Filing in Response to May 18, 2023 Order on Compliance Filing
Docket No. ER22-2356-000**

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act (“FPA”),¹ part 35 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) regulations,² and Order No. 714,³ Public Service Company of Colorado (“PSCo”), submits the enclosed revisions to Attachment S – Transmission Line Ratings of the Xcel Energy Operating Companies Joint Open Access Transmission Tariff (“Xcel Energy OATT”)⁴ in compliance with the Commission’s May 18, 2023 Order on Compliance Filing in Docket No. ER22-2356-000 (“May 18 Order”). The enclosed revisions to Attachment S implement revisions the Commission directed PSCo to make in the May 18 Order.

PSCo respectfully requests an effective date of July 12, 2025, consistent with the effective date determined in Order Nos. 881⁵ and confirmed in Order No. 881-A⁶ and the May 18 Order.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. pt. 35 (2022).

³ *Electronic Tariff Filings*, FERC Stats. & Regs. ¶ 31,276 (2008), *order on clarification*, Order No. 714-A, 147 FERC ¶ 61,115 (2014) (“Order No. 714”).

⁴ PSCo is the designated e-Tariff filing entity for the Xcel Energy OATT, consistent with the requirements of Order No. 714.

⁵ Managing Transmission Line Ratings, Order No. 881, 177 FERC ¶ 61,179 (2021) (“Order No. 881”).

⁶ Managing Transmission Line Ratings, Order No. 881-A, 179 FERC ¶ 61,125 (2022) (“Order No. 881-A”).

The enclosed revisions will have no effect on rates.⁷

I. CONTENTS OF FILING

This filing consists of the following items, which are included as attachments to the XML package:

1. This transmittal letter;
2. A clean copy of the proposed revisions to Attachment S of the Xcel Energy OATT in eTariff format; and
3. A marked copy of the proposed revisions to Attachment S of the Xcel Energy OATT in eTariff format.

II. BACKGROUND

A. Public Service Company of Colorado

PSCo is a wholly owned utility operating company subsidiary of Xcel Energy Inc. (“Xcel Energy”), a public utility holding company. PSCo is a vertically integrated electric utility that, *inter alia*, provides open access wholesale transmission services to transmission customers under the Xcel Energy OATT.

B. The Order on Compliance in Docket No. ER22-2356-000

On July 12, 2022, PSCo submitted proposed revisions to Attachment S of the Xcel Energy OATT (the “July 12 Filing”) to comply with the requirements set forth in Order No. 881, which revised both the *pro forma* Open Access Transmission Tariff (“OATT”) to include a new Attachment M on Transmission Line Ratings and the Commission’s regulations under section 206 of the FPA⁸ to improve the accuracy and transparency of electric transmission line ratings. The Commission issued the May 18 Order in response to PSCo’s July 12 Filing, accepting it in part and rejecting it in part, subject to further compliance filings.

PSCo proposed certain clarifying edits to the *pro forma* OATT Attachment M, and while the Commission accepted certain edits, the Commission found in the May 18 Order that two clarifications were not consistent with or superior to the *pro forma* OATT.⁹ Specifically, the Commission rejected PSCo’s proposals to clarify that (1) transmission line ratings are calculated

⁷ The enclosed revisions do not modify or otherwise affect the Xcel Energy OATT provisions applicable to service over the facilities of the other Xcel Energy Operating Companies, which are Northern States Power company, a Minnesota corporation; Northern States Power Company, a Wisconsin corporation; and Southwestern Public Service Company.

⁸ 16 U.S.C. § 824e.

⁹ May 18 Order an PP 12 and 22.

for North American Electric Reliability Corporation (“NERC”) bulk electric system (“BES”) transmission lines over which PSCo sells transmission service instead of all transmission lines over which it provides transmission service; and (2) both point-to-point and network transmission service may be curtailed close to real-time based on actual scheduled deliveries. The Commission subsequently directed PSCo to submit a second compliance filing to remove the language associated with these rejected clarifications within 60 days of the issuance of the May 18 Order.¹⁰

III. DESCRIPTION AND JUSTIFICATION OF PROPOSED TARIFF REVISIONS

The enclosed revisions to Attachment S of the Xcel Energy OATT implement the directives set forth in the May 18 Order. Under the “General” section of Attachment S, PSCo is removing the phrase “North American Electric Reliability Corporation (NERC) bulk electric system (BES)” consistent with the *pro forma* OATT Attachment M. Under the section titled “Obligations of Transmission Provider,” PSCo is also removing the following sentence, which appears twice, once with respect to point-to-point and once with respect to network integration transmission service:

Transmission provider may curtail Transmission Service close to real-time based on scheduled service even if changes in ambient temperature forecasts identify negative ATC in the 10-day horizon

The removal of this language is consistent with paragraphs 12 and 22 of the May 18 Order, wherein the Commission found that these clarifications are not consistent with or superior to the *pro forma* OATT. The changes submitted herein are being submitted to comply with the May 18 Order and will have no impact on rates.

IV. PROPOSED EFFECTIVE DATE AND REQUESTS FOR WAIVERS

PSCo respectfully requests that the Commission grant a waiver of its notice requirements¹¹ and allow an effective date of July 12, 2025 for the revisions proposed herein, consistent with the requirements set forth in the May 18 Order. PSCo submits that good cause exists to grant the requested effective date given that PSCo is submitting this compliance filing at the direction of the Commission.¹² Furthermore, Commission policy permits waivers of the prior notice requirement in the case of uncontested filings that do not change rates.¹³

PSCo additionally respectfully requests waiver of any other filing requirements under the Commission’s regulations which the Commission deems necessary to accept the enclosed revisions, including any applicable requirements of the cost-of-service regulations in 18 C.F.R. §

¹⁰ *Id.*

¹¹ 18 C.F.R. § 35.3(a).

¹² 18 C.F.R. § 35.11.

¹³ *See Central Hudson Gas & Electric Corp.*, 60 FERC ¶ 61,106, *reh’g denied*, 61 FERC ¶ 61,189 (1992); *see also Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, at 61,984 *reh’g granted in part*, 65 FERC ¶ 61,081 (1993).

35.13. Good cause exists to grant all necessary waivers, as the filing will provide no rate impact on transmission customers.

V. SERVICE

Pursuant to 18 C.F.R. § 35.2(e), an electronic version or notice of this filing will be served upon the state commission having jurisdiction over PSCo, upon PSCo's transmission service customers and upon the parties to the service list maintained by the Commission in Docket No. ER22-2356-000. A courtesy copy will be provided to the Director, Electric Power Regulation (West). In addition, a copy of this filing will be posted at the offices of PSCo at 1800 Larimer Street in Denver, Colorado.

VI. COMMUNICATIONS AND CORRESPONDENCE

Correspondence and communications with respect to this filing should be sent to, and PSCo requests the Secretary include on the official service list, the following¹⁴:

Timothy T. Mastrogiacom
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¹⁴ To the extent necessary, PSCo respectfully requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b), to permit the persons listed to be placed on the official service list for this proceeding.

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VII. CONCLUSION

PSCo respectfully requests that the Commission accept the revisions to Attachment S of the Xcel Energy OATT proposed herein, without suspension or hearing, to be effective July 12, 2025.

Respectfully submitted,

/s/ Timothy T. Mastrogiacomo

Timothy T. Mastrogiacomo

Lead Assistant General Counsel

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Washington, DC 20006

(202) 661-4481

Tim.T.Mastrogiacomo@xcelenergy.com

*Counsel for Public Service Company of
Colorado*

Cc: Colorado Public Utilities Commission
Transmission Tariff Customers
Director, Electric Power Regulation (West)

CERTIFICATE OF SERVICE

I, Anne Woodburn, hereby certify that I have this day served a notice of the enclosed document filing, electronically, on the Colorado Public Utilities Commission, PSCo's transmission service customers, and each party designated on the official service list compiled by the Secretary in Docket No. ER22-2356-000.

Dated at Golden, CO this 14th day of July, 2023.

/s/ Anne Woodburn

Anne Woodburn

Xcel Energy Services Inc.

Transmission Business Analyst

18201 W. 10th Ave.

Golden, CO 80401

Phone: (720) 532-3106

Anne.M.Woodburn@xcelenergy.com

ATTACHMENT S

Transmission Line Ratings

General:

Beginning July 12, 2025, the Transmission Provider will implement Transmission Line Ratings on the transmission lines over which it provides Transmission Service, as provided below.

Definitions:

The following definitions apply for purposes of this Attachment:

- (1) "Transmission Line Rating" means the maximum transfer capability of a transmission line, computed in accordance with a written Transmission Line Rating methodology and consistent with Good Utility Practice, considering the technical limitations on conductors and relevant transmission equipment (such as thermal flow limits), as well as technical limitations of the Transmission System (such as system voltage and stability limits). Relevant transmission equipment may include, but is not limited to, circuit breakers, line traps, and transformers.
- (2) "Ambient-Adjusted Rating" (AAR) means a Transmission Line Rating that:
 - (a) Applies to a time period of not greater than one hour.
 - (b) Reflects an up-to-date forecast of ambient air temperature across the time period to which the rating applies.
 - (c) Reflects the absence of solar heating during nighttime periods, where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently.
 - (d) Is calculated at least each hour, if not more frequently.
- (3) "Seasonal Line Rating" means a Transmission Line Rating that:
 - (a) Applies to a specified season, where seasons are defined by the Transmission Provider to include not fewer than four seasons in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent.
 - (b) Reflects an up-to-date forecast of ambient air temperature across the relevant season over which the rating applies. The forecast used to determine the seasonal rating may largely be based on historical ambient air temperatures observed during the season.
 - (c) Is calculated annually, if not more frequently, for each season in the future for which Transmission Service can be requested.

- (4) “Near-Term Transmission Service” means Transmission Service which ends not more than 10 days after the Transmission Service request date. When the description of obligations below refers to either a request for information about the availability of potential Transmission Service (including, but not limited to, a request for ATC), or to the posting of ATC or other information related to potential service, the date that the information is requested or posted will serve as the Transmission Service request date. “Near-Term Transmission Service” includes any Point-To-Point Transmission Service, Network Resource designations, or secondary service where the start and end date of the designation or request is within the next 10 days.
- (5) “Emergency Rating” means a Transmission Line Rating that reflects operation for a specified, finite period, rather than reflecting continuous operation. An Emergency Rating may assume an acceptable loss of equipment life or other physical or safety limitations for the equipment involved.

System Reliability:

If the Transmission Provider reasonably determines, consistent with Good Utility Practice, that the temporary use of a Transmission Line Rating different than would otherwise be required by this Attachment is necessary to ensure the safety and reliability of the Transmission System, then the Transmission Provider may use such an alternate rating. The Transmission Provider must document in its database of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website, as required by this Attachment, the use of an alternate Transmission Line Rating under this paragraph, including the nature of and basis for the alternate rating, the date and time that the alternate rating was initiated, and (if applicable) the date and time that the alternate rating was withdrawn and the standard rating became effective again.

Obligations of Transmission Provider:

The Transmission Provider will have the following obligations.

The Transmission Provider must use AARs as the relevant Transmission Line Ratings when performing any of the following functions: (1) evaluating requests for Near-Term Transmission Service; (2) responding to requests for information on the availability of potential Near-Term Transmission Service (including requests for ATC or other information related to potential service); or (3) posting ATC or other information related to Near-Term Transmission Service to the Transmission Provider’s OASIS site or another password-protected website.

The Transmission Provider must use AARs as the relevant Transmission Line Ratings when determining whether to curtail (under section 13.6) Firm Point-To-Point Transmission Service or when determining whether to curtail and/or interrupt (under section 14.7) Non-Firm Point-To-Point Transmission Service if such curtailment and/or interruption is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within

10 days of such determination. For determining whether to curtail or interrupt Point-To-Point Transmission Service in other situations, the Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings.

The Transmission Provider must use AARs as the relevant Transmission Line Ratings when determining whether to curtail (under section 33) or redispatch (under sections 30.5 and/or 33) Network Integration Transmission Service or secondary service if such curtailment or redispatch is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination. For determining the necessity of curtailment or redispatch of Network Integration Transmission Service or secondary service in other situations, the Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings.

The Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings when evaluating requests for and whether to curtail, interrupt, or redispatch any Transmission Service not otherwise covered above in this section (including, but not limited to, requests for non-Near-Term Transmission Service or requests to designate or change the designation of Network Resources or Network Load), when developing any ATC or other information posted or provided to potential customers related to such services. The Transmission Provider must use Seasonal Line Ratings as a recourse rating in the event that an AAR otherwise required to be used under this Attachment is unavailable.

The Transmission Provider must use uniquely determined Emergency Ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints. Such uniquely determined Emergency Ratings must also include separate AAR calculations for each Emergency Rating duration used.

In developing forecasts of ambient air temperature for AARs and Seasonal Line Ratings, the Transmission Provider must develop such forecasts consistent with Good Utility Practice and on a non-discriminatory basis.

Postings to OASIS or another password-protected website: The Transmission Provider must maintain on the password-protected section of its OASIS page or on another password-protected website a database of Transmission Line Ratings and Transmission Line Rating methodologies. The database must include a full record of all Transmission Line Ratings, both as used in real-time operations, and as used for all future periods for which Transmission Service is offered. Any postings of temporary alternate Transmission Line Ratings or exceptions used under the System Reliability section above or the Exceptions section below, respectively, are considered part of the database. The database must include records of which Transmission Line Ratings and Transmission Line Rating methodologies were in effect at which times over at least the previous five years, including records of which temporary alternate Transmission Line Ratings or exceptions were in effect at which times during the previous five years. Each record in the database must indicate which transmission line the record applies to, and the date and time the record was entered into the database. The database must be maintained such that users can view, download, and query data in standard formats, using standard protocols.

Sharing with Transmission Providers: The Transmission Provider must share, upon request by any Transmission Provider and in a timely manner, the following information:

- (1) Transmission Line Ratings for each period for which Transmission Line Ratings are calculated, with updated ratings shared each time Transmission Line Ratings are calculated, and
- (2) Written Transmission Line Rating methodologies used to calculate the Transmission Line Ratings in (1) above.

Exceptions: Where the Transmission Provider determines, consistent with Good Utility Practice, that the Transmission Line Rating of a transmission line is not affected by ambient air temperature or solar heating, the Transmission Provider may use a Transmission Line Rating for that transmission line that is not an AAR or Seasonal Line Rating. Examples of such a transmission line may include (but are not limited to): (1) a transmission line for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a transmission line whose transfer capability is limited by a Transmission System limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating. The Transmission Provider must document in its database of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website any exceptions to the requirements contained in this Attachment initiated under this paragraph, including the nature of and basis for each exception, the date(s) and time(s) that the exception was initiated, and (if applicable) the date(s) and time(s) that each exception was withdrawn and the standard rating became effective again. If the technical basis for an exception under this paragraph changes, then the Transmission Provider must update the relevant Transmission Line Rating(s) in a timely manner. The Transmission Provider must reevaluate any exceptions taken under this paragraph at least every five years.

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Beginning July 12, 2025, the Transmission Provider will implement Transmission Line Ratings on the ~~North American Electric Reliability Corporation (NERC) bulk electric system (BES)~~ transmission lines over which it provides Transmission Service, as provided below.

Definitions:

The following definitions apply for purposes of this Attachment:

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- (2) "Ambient-Adjusted Rating" (AAR) means a Transmission Line Rating that:
 - (a) Applies to a time period of not greater than one hour.
 - (b) Reflects an up-to-date forecast of ambient air temperature across the time period to which the rating applies.
 - (c) Reflects the absence of solar heating during nighttime periods, where the local sunrise/sunset times used to determine daytime and nighttime periods are updated at least monthly, if not more frequently.
 - (d) Is calculated at least each hour, if not more frequently.
- (3) "Seasonal Line Rating" means a Transmission Line Rating that:
 - (a) Applies to a specified season, where seasons are defined by the Transmission Provider to include not fewer than four seasons in each year, and to reasonably reflect portions of the year where expected high temperatures are relatively consistent.
 - (b) Reflects an up-to-date forecast of ambient air temperature across the relevant season over which the rating applies. The forecast used to determine the seasonal rating may largely be based on historical ambient air temperatures observed during the season.

- (c) Is calculated annually, if not more frequently, for each season in the future for which Transmission Service can be requested.
- (4) “Near-Term Transmission Service” means Transmission Service which ends not more than 10 days after the Transmission Service request date. When the description of obligations below refers to either a request for information about the availability of potential Transmission Service (including, but not limited to, a request for ATC), or to the posting of ATC or other information related to potential service, the date that the information is requested or posted will serve as the Transmission Service request date. “Near-Term Transmission Service” includes any Point-To-Point Transmission Service, Network Resource designations, or secondary service where the start and end date of the designation or request is within the next 10 days.
- (5) “Emergency Rating” means a Transmission Line Rating that reflects operation for a specified, finite period, rather than reflecting continuous operation. An Emergency Rating may assume an acceptable loss of equipment life or other physical or safety limitations for the equipment involved.

System Reliability:

If the Transmission Provider reasonably determines, consistent with Good Utility Practice, that the temporary use of a Transmission Line Rating different than would otherwise be required by this Attachment is necessary to ensure the safety and reliability of the Transmission System, then the Transmission Provider may use such an alternate rating. The Transmission Provider must document in its database of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website, as required by this Attachment, the use of an alternate Transmission Line Rating under this paragraph, including the nature of and basis for the alternate rating, the date and time that the alternate rating was initiated, and (if applicable) the date and time that the alternate rating was withdrawn and the standard rating became effective again.

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The Transmission Provider must use AARs as the relevant Transmission Line Ratings when determining whether to curtail (under section 13.6) Firm Point-To-Point Transmission Service or when determining whether to curtail and/or interrupt (under section 14.7) Non-Firm Point-To-Point Transmission Service if such curtailment and/or

interruption is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination. ~~Transmission Provider may curtail Transmission Service close to real-time based on scheduled service even if changes in ambient temperature forecasts identify negative ATC in the 10-day horizon.~~ For determining whether to curtail or interrupt Point-To-Point Transmission Service in other situations, the Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings.

The Transmission Provider must use AARs as the relevant Transmission Line Ratings when determining whether to curtail (under section 33) or redispatch (under sections 30.5 and/or 33) Network Integration Transmission Service or secondary service if such curtailment or redispatch is both necessary because of issues related to flow limits on transmission lines and anticipated to occur (start and end) within 10 days of such determination. ~~Transmission Provider may curtail Transmission Service close to real-time based on scheduled service even if changes in ambient temperature forecasts identify negative ATC in the 10-day horizon.~~ For determining the necessity of curtailment or redispatch of Network Integration Transmission Service or secondary service in other situations, the Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings.

The Transmission Provider must use Seasonal Line Ratings as the relevant Transmission Line Ratings when evaluating requests for and whether to curtail, interrupt, or redispatch any Transmission Service not otherwise covered above in this section (including, but not limited to, requests for non-Near-Term Transmission Service or requests to designate or change the designation of Network Resources or Network Load), when developing any ATC or other information posted or provided to potential customers related to such services. The Transmission Provider must use Seasonal Line Ratings as a recourse rating in the event that an AAR otherwise required to be used under this Attachment is unavailable.

The Transmission Provider must use uniquely determined Emergency Ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints. Such uniquely determined Emergency Ratings must also include separate AAR calculations for each Emergency Rating duration used.

In developing forecasts of ambient air temperature for AARs and Seasonal Line Ratings, the Transmission Provider must develop such forecasts consistent with Good Utility Practice and on a non-discriminatory basis.

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record in the database must indicate which transmission line the record applies to, and the date and time the record was entered into the database. The database must be maintained such that users can view, download, and query data in standard formats, using standard protocols.

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- (2) Written Transmission Line Rating methodologies used to calculate the Transmission Line Ratings in (1) above.

Exceptions: Where the Transmission Provider determines, consistent with Good Utility Practice, that the Transmission Line Rating of a transmission line is not affected by ambient air temperature or solar heating, the Transmission Provider may use a Transmission Line Rating for that transmission line that is not an AAR or Seasonal Line Rating. Examples of such a transmission line may include (but are not limited to): (1) a transmission line for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a transmission line whose transfer capability is limited by a Transmission System limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating. The Transmission Provider must document in its database of Transmission Line Ratings and Transmission Line Rating methodologies on OASIS or another password-protected website any exceptions to the requirements contained in this Attachment initiated under this paragraph, including the nature of and basis for each exception, the date(s) and time(s) that the exception was initiated, and (if applicable) the date(s) and time(s) that each exception was withdrawn and the standard rating became effective again. If the technical basis for an exception under this paragraph changes, then the Transmission Provider must update the relevant Transmission Line Rating(s) in a timely manner. The Transmission Provider must reevaluate any exceptions taken under this paragraph at least every five years.