November 23, 2022

Regulatory Commission of Alaska
701 West Eighth Avenue, Suite 300
Anchorage, AK 99501

Re: Tariff Letter TE1-9001

Dear Commissioners,

The Railbelt Reliability Council (RRC) hereby submits its proposed tariff, initial annual surcharge, and modified proposed budget for fiscal year 2023 for approval by the Regulatory Commission of Alaska (“Commission”) in compliance with 3 AAC 46.330, 3 AAC 46.430, and 3 AAC 46.160(e), and as required by Order E-22-001(12).

The RRC previously submitted its proposed tariff and initial annual surcharge with the RRC’s Application for Certification as an ERO (Docket E-22-001). Consistent with the ruling in Order E-22-001(12), the RRC is filing its proposed tariff and initial surcharge as a new tariff filing. The proposed tariff, including the initial annual surcharge, is attached hereto as Exhibit A.

The RRC’s proposed budget was submitted to the Commission as an informational filing, EB1-9001, on October 10, 2022 pursuant to 3 AAC 46.160 and Order E-22-001(12). Pursuant to 3 AAC 46.160(e), the RRC is submitting a modified proposed budget for fiscal year 2023 (“Proposed 2023 Budget”) that reflects revised cost estimates and changes made in response to comments received regarding the budget submitted with EB1-9001. The Proposed 2023 Budget is attached hereto as Exhibit B. A resolution passed by the RRC Board of Directors authorizing the Proposed 2023 Budget is attached hereto as Exhibit C, as required by 3 AAC 46.430(a)(1). All public documents that support the Proposed 2023 Budget are now available on the RRC’s website.

2 Id. at 18-20.
3 The Commission suspended EB1-9001 for investigation into Docket E-22-002 on November 17, 2022. The RRC plans to file the modified 2023 budget attached hereto in that docket unless otherwise directed by the Commission. In order to ensure that the RRC’s tariff and initial annual surcharge are effective by June 1, 2023, the RRC respectfully requests that, if the tariff is suspended for investigation, the Commission address the tariff, initial annual surcharge, and 2023 budget within the 180-day statutory timeframe provided by 3 AAC 46.390(d) for investigation of a tariff filing.
Below is an explanation of the proposed tariff, initial annual surcharge, and Proposed 2023 Budget.

1. **RRC Proposed Tariff**

   a. **Summary of Tariff & Stakeholder Process Leading to Development of Proposed Tariff**

   The tariff is the means by which the RRC, as the certificated Electric Reliability Organization (ERO) for the Railbelt Bulk Electric System, will provide regulated services, including developing reliability standards and standards for open access transmission and interconnection, Railbelt integrated resource planning, and cost recovery for additions and modifications to meet Railbelt system requirements.

   The proposed tariff includes the following:
   
   - General arrangement and content as required under 3 AAC 46.360(a)(1-6);
   - Additional requirements as specified at 3 AAC 46.360(c) and (d);
   - Symbols as specified at 3 AAC 46.360(e) with regard to the initial annual surcharge;
   - Structural arrangements as specified under 3 AAC 46.360(h) for the filing of 3 AAC 46.360(a)(7) standards in the future;
   - An initial annual surcharge to meet the intent of 3 AAC 46.430;
   - Terms, conditions, and schedules to provide for open access transmission and interconnection in accordance with 3 AAC 46.440; and
   - Terms, conditions, and a schedule to provide for transmission cost recovery under 3 AAC 46.450.

   Significant effort was made to develop a comprehensive initial tariff that will enable the RRC to provide ERO services consistent with the ERO statutes and regulations. The tariff was drafted by a committee of RRC Board members representing several Railbelt stakeholder groups with the assistance of a regulatory consultant and valuable input from Commission staff. The tariff supports

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4 These documents address parts A and B of the public comments submitted in response to EB1-9001 by RAPA. RAPA also requested in Part D of this comments that the Commission request verification that the RRC notified all Registered Entities of the budget and location of supporting documents. There are currently no Registered Entities to notify. As defined in the RRC’s tariff, Registered Entities are Users, Owners, and Operators that are registered with the RRC and subject to reliability standards approved by the RRC and RCA. Registered Entities will therefore be identified and registered as RRC standards are developed. As indicated in EB1-9001, the RRC did provide public notice of EB1-9001 on its website.
the unique characteristics of an ERO by providing for initiation of RRC services, funding the RRC’s inception year through a levied surcharge, and accommodating the sequential addition of tariff content over time. The proposed tariff can go into effect while the RRC develops reliability and other standards to submit to the Commission for approval. Each standard, or group of standards, will, upon development and approval by the RRC pursuant to the RRC’s Rules, be filed as a new or revised tariff provision in accordance with 3 AAC 46.320, 3 AAC 46.410, and 3 AAC 46.440.

b. Summary of How Proposed Tariff is Just, Reasonable, and Not Unduly Discriminatory or Preferential, and in the Public Interest

The tariff is just, reasonable, not unduly discriminatory or preferential, and in the public interest. It was prepared to comply with the relevant regulations at 3 AAC 46.360 based on input from representatives of the stakeholders to which the tariff will apply to ensure that the tariff is not unduly discriminatory or preferential to any entity. The tariff is in the public interest as it will allow the RRC to undertake the obligations of the Railbelt ERO, including to develop and enforce reliability standards and establish terms and conditions for the provision of open access transmission and interconnection to the Railbelt system. As recognized by the Alaska state legislature when it passed the ERO statute, the services provided by the Railbelt ERO are in the public interest and will ultimately result in benefits to customers of the Railbelt load serving entities (“LSEs”).

2. Initial Surcharge

The RRC’s initial surcharge is included in the proposed tariff at Tariff Sheet 25 - Schedule of RRC Surcharge. Calculation of the proposed surcharge and allocation to each LSE was done through the cost allocation methodology provided in the RRC’s Equitable Allocation of Costs Rule (ER13).

The surcharge calculation in accordance with Rule ER13 is provided as follows:

<table>
<thead>
<tr>
<th>Load Serving Entity</th>
<th>Net Energy for Load (kWh)</th>
<th>Budget Year FY 2023</th>
<th>LSE Surcharge Annual</th>
<th>LSE Surcharge Monthly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chugach</td>
<td>1,922,933,572</td>
<td>655,423.63</td>
<td>655,423.63</td>
<td>54,618.64</td>
</tr>
<tr>
<td>GVEA</td>
<td>1,196,393,632</td>
<td>407,785.62</td>
<td>407,785.62</td>
<td>33,982.13</td>
</tr>
<tr>
<td>HEA</td>
<td>461,432,441</td>
<td>157,277.26</td>
<td>157,277.26</td>
<td>13,106.44</td>
</tr>
<tr>
<td>MEA</td>
<td>758,772,477</td>
<td>258,624.33</td>
<td>258,624.33</td>
<td>21,552.03</td>
</tr>
<tr>
<td>SES</td>
<td>59,628,617</td>
<td>20,324.16</td>
<td>20,324.16</td>
<td>1,693.68</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,399,160,739</strong></td>
<td><strong>1,499,435.00</strong></td>
<td><strong>1,499,435.00</strong></td>
<td><strong>124,952.92</strong></td>
</tr>
</tbody>
</table>

Consequently, the RRC’s proposed entry on Sheet 25 of the proposed tariff is shown as follows:
3. Modified Proposed Budget

The Proposed 2023 Budget is attached hereto as Exhibit B. The Proposed 2023 Budget and initial surcharge are based on an estimated date of approval of the RRC’s initial tariff of May 31, 2023.\textsuperscript{5} Based on this estimated tariff approval date, the RRC anticipates that the activities funded by its fiscal year 2023 budget will include retaining a CEO and initial staff, establishing permanent offices, and continuing administrative work required to establish a functioning ERO that complies with the RRC’s bylaws, rules, and policies and satisfies the requirements of the ERO statutes and regulations. For the period prior to approval of the initial tariff, the RRC plans to continue to fund the work of the RRC Board of Directors in the manner through which it funded the work of the RRC Implementation Committee and is currently funding the work of the RRC Board of Directors.

The RRC submitted an informational budget filing, EB1-9001, to the Commission on October 10, 2022. That budget filing provided a narrative description and explanation of each item in the proposed budget, as required by 3 AAC 46.160(c)(1). The Proposed 2023 Budget filed herewith as Exhibit B reflects the following modifications, which were made to reflect revised cost estimates and address comments received on the budget filed with EB1-9001:

- **Inflation Rate:** The proposed budget submitted with EB1-9001 included 2021 cost/salary figures for some budget line items and 2022 cost/salary figures for others, both of which were multiplied by an inflation factor of 8% to arrive at 2023 estimates. The Proposed 2023 Budget filed herewith was modified so that any 2021 costs/salaries used as a basis for 2023 estimates were first multiplied by an inflation factor of 8% to obtain 2022

\textsuperscript{5} Based on the anticipated tariff approval date of May 31, 2023, the Proposed 2023 Budget includes only those activities that the RRC plans to complete in its first six months of operation as the ERO. If the tariff is approved prior to May 31, 2023, the RRC will begin to undertake its major planned ERO activities earlier than June 1, 2023 and will likely be able to begin additional activities in 2023. In the event that the tariff is approved before May 31, 2023, the RRC will submit a revised 2023 budget that is adjusted for additional months of operation and includes estimated costs for activities the RRC plans to undertake after its first six months of operation as the ERO.
estimates, and all 2022 costs/salaries were multiplied by an inflation factor of 4% to arrive at 2023 costs/salaries.

- **Board Meeting Fees:** The estimated 2023 board meeting fee was reduced from $414 to $398 to reflect the actual 2022 average of Railbelt co-op board meeting fees of $383 (which did not increase from 2021 and is the meeting fee adopted by the Board and currently in effect), multiplied by a 4% inflation adjustment.

- **Insurance:** The estimated 2023 insurance expense was adjusted to reflect a quote received after EB1-9001 was filed from Brown & Riding of $27,637.93 annually for Director & Officer, employment liability, security, privacy breach, computer fraud, and cyber insurance. This quote is available on the RRC’s website at [www.AKRRC.org](http://www.AKRRC.org). The 2023 cost estimate for Insurance of $33,000 reflects an estimated annual payment in November 2023 of the 2022 quoted amount with an upward adjustment for E&O insurance coverage, which the RRC plans to add in 2023.

The Proposed 2023 Budget (Exhibit B) provides a schedule showing the proposed dollar amount of each budget line item by account number, including any subaccounts, and includes the proposed dollar amount for each major planned activity and general administrative expenses of the RRC in 2023, as required by 3 AAC 46.430(c)(3) and (6).

As noted above, during the six months of 2023 that the RRC anticipates its tariff will be in effect, the RRC’s major activities will include retaining a CEO and staff, renting and furnishing office space, and performing RRC Board and administrative functions required to establish a functioning and compliant ERO. As required by 3 AAC 46.430(c)(4) and (5), a list of identified major planned activities and the plan and estimated costs for carrying out each is as follows:

- **Retain CEO and Support Staff:** The RRC anticipates engaging an executive search agency to assist with retention of a CEO by October 1, 2023. The costs associated with this activity are reflected in the budget as follows:
  
  o The Proposed 2023 Budget includes $77,194 on line 18 for Recruitment Services (Row 18). The estimated 2023 cost for an executive search firm to assist in retention of a CEO is 25% of the CEO’s proposed 2023 annual salary based on recent executive search experience by employers of RRC Directors.

  o The 2023 CEO salary ($333,478, Row 5) is based on the average of the 10 largest Alaska electric co-op CEO salaries in 2021, multiplied by an 8% inflation factor to obtain a 2022 estimate, which was then multiplied by a 4% inflation factor to adjust for anticipated 2022 inflation. The 2023 staffing level of 25% is based on an anticipated hire date for the CEO of October 1, 2023, assuming a three-month search and hiring process. The “Fully Loaded Cost” includes benefits and retirement.
o The 2023 salary figures for the executive assistant ($108,548, Exhibit B - Row 6) and records manager ($78,624, Row 7) positions are based on 2021 salary survey data from Chugach Electric Association (CEA) and Matanuska Electric Authority (MEA), multiplied by an 8% inflation adjustment for 2022 and a 4% inflation adjustment for 2022 to arrive at 2023 estimates. The “Fully Loaded Cost” for each includes benefits and retirement.

- **Rent and Furnish Office Space:** The RRC plans to rent and furnish office space for the RRC beginning October 1, 2023, which will require it to incur both one-time and monthly expenses. The estimated costs for office space, tenant improvements, internet, servers and network setup, offsite backup, computers, software, and printers, and office furniture are provided in rows 29-35 of the Proposed 2023 Budget attached as Exhibit B and explained below:

  o **Office Rent** (Row 29): the 2023 cost for office rent of $11,700 per month is based on an average 2022 cost for Class A office space of $11,250 per month ($2.50/ft² x 4,500ft²) adjusted for 4% inflation. Class A office space was selected to ensure that the RRC office is ADA compliant. The monthly rental fee includes all utilities, which are included with Class A office space rent.

  o **Tenant Improvements** (Row 30): the one-time 2023 cost of $83,200 for tenant improvements to the RRC office space, including telecommunication wiring, any necessary renovations, sound proofing, furniture, and any other expenses required to facilitate RRC operations and a meeting venue for the Board of Directors, Working Groups, and other RRC gatherings, is based on 2022 expenditures for office renovations by employers of RRC Directors, adjusted for 4% inflation.

  o **Internet** (Row 31): the monthly 2023 cost of $2,746 for internet, including phone and video conferencing, to operate and ensure public access to the RRC’s records and meetings is based on monthly internet expenses incurred by employers of RRC Directors in 2022 adjusted for 4% inflation. Internet expenses will begin October 1, 2023 when the RRC anticipates opening its office.

  o **Servers & Network Setup** (Row 32): the one-time 2023 cost of $58,240 for servers and network setup is based on an estimated cost of $12,000 per server for four servers plus a $6,000 setup fee, adjusted for 4% inflation, and is based on 2022 expenditures by employers of RRC Directors.

  o **Offsite Backup** (Row 33): the monthly 2023 cost for offsite backup for RRC data of $8,320 is based on the 2022 expenditure for offsite backup by an RRC Director’s employer, adjusted for 4% inflation. The RRC anticipates offsite backup beginning October 1, 2023.

  o **Computers, Software, Printers/Scanners** (Row 34): the 2023 per-unit cost of $14,560 for computers, software, and printer/scanners is based on market pricing
for business laptop and desktop computers, office, accounting and engineering software, and printers/scanners that the RRC plans to purchase. 2022 market prices are adjusted for 4% inflation to 2023 pricing.

- **Office Furniture** (Row 35): the 2023 one-time cost of $7,800 per employee for office furniture, including ergonomic desks, chairs, and shelving is based on 2022 office equipment cost data collected by MEA, adjusted for 4% inflation.

- **RRC Administrative Expenses:** The remaining portion of the Proposed 2023 Budget is administrative expenses required to continue RRC Board of Director meetings and administrative functions; purchase insurance; procure HR, legal, and accounting services; revise and maintain the RRC website; and provide RRC Board of Director training. Estimated costs for these expenses are provided in Rows 14-25 of the Proposed 2023 Budget attached as Exhibit B.

**Conclusion**

The RRC appreciates the Commission’s review of the RRC’s proposed tariff, initial annual surcharge, and 2023 budget.

Respectfully Submitted,

Railbelt Reliability Council

Julie Estey
Chair, Railbelt Reliability Council Board of Directors
Phone: (907) 355-4447
Email: julie.estey@mea.coop

**Attachments:**
- **Exhibit A:** RRC Proposed Tariff & Initial Annual Surcharge
- **Exhibit B:** Modified Proposed RRC Fiscal Year 2023 Budget
- **Exhibit C:** RRC Board of Directors Resolution Approving FY 2023 Budget
TARIFF NO. 1

Railbelt Reliability Council

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Anchorage, AK 99518

www.akrrc.org
907-761-9412
Email: Info@akrrc.org

Electric Reliability Organization
Providing Electric Reliability Standards and
System Planning Services for:

The Alaska Railbelt Interconnected Bulk-Electric System

of:

Fairbanks North Star Borough
Southeast Fairbanks Census District
Denali Borough
Matanuska-Susitna Borough
Municipality of Anchorage
Kenai Peninsula Borough
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Railbelt Reliability Council
Effective:
Railbelt Reliability Council

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RULES AND REGULATIONS

1.0 GENERAL

1.1 Contacting the Railbelt Reliability Council

Normal working hours for the Railbelt Reliability Council (RRC) are 8 a.m. through 5 p.m., Monday through Friday. The RRC will be closed for regular business on all state and federal holidays.

The RRC may be contacted by email at info@akrrc.org, or by telephone at 907-761-9412. Messages and calls should state the purpose for the call and the person to whom the message or call should be directed, if known. All emails and calls will be forwarded appropriately.

Personnel and departments of the RRC will be identified on the RRC website www.akrrc.org with contact information and links provided.

1.2 Tariff Adoption and Revisions

The RRC tariff is subject to the jurisdiction of the Regulatory Commission of Alaska (RCA) (http://rca.alaska.gov). Upon approval of the RCA, each effective tariff sheet, form, or other document will be validated with the RCA’s date-of-receipt in the upper right corner and the effective date on the bottom right corner of each tariff sheet, form, or other document. Each effective tariff on file with the RCA is lawful until revised.

Tariff revisions and additions are publicly noticed in accordance with 3 Alaska Administrative Code (AAC) 46.370 and subject to review and approval by the RCA. Rules and policies for public and Registered Entity (RE) comment on proposed tariff revisions and additions are available at www.akrrc.org.

1.3 Conflicts & Complaints

The RRC should be notified, as provided in Section 1.1, if conflicts are perceived among tariff provisions, including conflicts among standards. In the event questions or conflicts arise, the tariff will remain in effect until the conflict is resolved. The RRC will respond with identification of additional sources of information on www.akrrc.org in order to resolve the perceived conflict.

1.3.1 Conflicts Unresolved by RRC

Conflicts of a reliability standard with any approved tariff provision that are unresolved by the RRC may be addressed by petition to the RCA in accordance with 3 AAC 46.010.
1.3.2 Conflict Resolution Process

The RCA may, upon petition or on its own motion, open a docket of investigation to review an approved reliability standard for conflict with a function, rule, tariff, rate schedule, or agreement that has also been accepted, approved, adopted, or ordered by the RCA.

If the conflict is affirmed by an order of the RCA, the RRC will resolve the conflict not later than 180 days after the RCA’s order, unless extended by the RCA. The RRC will resubmit the reliability standard in a compliance filing in the docket of investigation and will resubmit the reliability standard under a new tariff letter if required under 3 AAC 46.410(e).

1.3.3 Complaints

Complaints regarding services provided or tariff rules and regulations must be addressed to the RRC as provided in Section 1.1. Complaints placed with the RRC will be handled pursuant to procedures available at www.akrrc.org.

1.4 Definitions

Interconnected Bulk-Electric System (BES) – The Railbelt interconnected electric energy transmission network that includes two or more load-serving entities, at least one of which is subject to the provisions of Alaska Statute (AS) 42.05.291 (i.e., Public Utility – Standards of Service and Facilities).

Interconnected Electric Energy Transmission Network – A network of interconnected electrical generation resources, transmission lines, interconnections, and associated equipment operated at voltages of 69 kilovolts or more, operating in a geographic area that are synchronized so that the failure of one or more of the components may adversely affect the ability of the operators of other components within the system to maintain reliable operation of the facilities within the control of the operators.

Load-serving Entity (LSE) – An electric utility that has a service obligation to distribute power to more than 10 customers that receive invoices directly from the entity.

Railbelt – The geographic area of Alaska extending from the communities of Fairbanks and Delta Junction in the north, south to Homer and Seldovia, west to Tyonek, and east to Glacier View, Seward and Whittier, containing the service territories of Golden Valley Electric Association, Matanuska Electric Association, Chugach Electric Association, Homer Electric Association, and the City of Seward.

Registered Entity (RE) – A User, Owner, or Operator registered with the RRC and subject to reliability standards approved by the RRC and the RCA.

Reliability Standard - A standard approved by the RCA that will provide for the reliable operation of the Transmission Network or the operation of a Transmission Network facility.
and may provide for protection from cybersecurity incident or facility security, or any class of operating standard for the Transmission Network, including balancing, modeling, protective relaying, reserve sharing, transmission planning, and reactive power generation and control.

**RRC Surcharge** – An amount by which the RRC will allocate the cost of the RRC to the LSEs.

**Transmission Network** – The Interconnected Electric Energy Transmission Network of the Railbelt.

**User, Owner, or Operator (UOO)** – A person or entity that is, or within a reasonable time will be, generating, transmitting, storing, or distributing electricity; and may, as a result of electric facilities or equipment it owns, leases, operates, or controls, adversely affect the reliable operation of the BES.

### 1.5 Acronyms and Abbreviations

- **AAC** Alaska Administrative Code
- **AS** Alaska Statute
- **BES** Interconnected Bulk-Electric System
- **ERO** Electric Reliability Organization
- **IRP** Integrated Resource Plan
- **kV** Kilovolt
- **LSE** Load-Serving Entity
- **OAS** Open Access Standard
- **RCA** Regulatory Commission of Alaska
- **RE** Registered Entity
- **RRC** Railbelt Reliability Council
- **UOO** User, Owner, or Operator
2.0 SERVICES

2.1 RRC General Information

The RRC is a certificated electric reliability organization (ERO), authorized to provide reliability standards and electric system planning services in accordance with Alaska Statutes (Article 9A – Electric Reliability Organizations, Plans and Standards, Sec. 42.05.760- Sec. 42.05.790). The RRC provides these services in accordance with regulations adopted by the RCA under the AAC, Chapter 46.

2.2 Registered Entities

A User, Owner, or Operator (UOO) that is subject to an RRC standard will be registered in accordance with the entity registration program of the Compliance Monitoring and Enforcement Program Rule (ER2) adopted by the RRC and available at www.akrrc.org. Each Registered Entity (RE) has both obligations and responsibilities with respect to the RRC and is obligated to comply with the RRC tariff.

2.3 Load-serving Entities

Each electric utility that is interconnected with the BES and has a service obligation to distribute power to more than 10 customers that receive invoices directly from the electric utility is a load-serving entity (LSE). Each LSE has both obligations and responsibilities with respect to the RRC and is subject to the RRC tariff.

2.4 RRC Administration

The RRC is the legal entity that (1) prepares, administers, oversees, and enforces the authorized activities of the RRC certificate; and (2) provides reliability standards, standards for open access transmission and interconnection, standards for transmission system cost recovery, and planning services for the BES.

2.4.1 Administrative Rules

The RRC administrative rules are available for review on the RRC website, www.akrrc.org.

2.4.2 Tariff Administration

This tariff is administered by the RRC through processes outlined in the RRC’s administrative rules. All proposed tariff additions and revisions will only be effective upon review and approval by the RCA.
2.5 Reliability Standards

The RRC establishes and enforces reliability standards that will provide for reliable operation of the BES. The standards so established and incorporated herein are subject to approval of the RCA and are enforced pursuant to the RCA regulations at 3 AAC 46.350.

Reliability standards of the RRC include, but are not limited to, any class of standards for the Transmission Network, including balancing, modeling, protective relaying, reserve sharing, transmission planning, reactive power generation and control, physical security, and cybersecurity.

2.6 Open Access Transmission and Interconnection Standards

2.6.1 RRC Open Access Standard – Transmission Services

The RRC establishes and enforces the standard for nondiscriminatory open access transmission services on the BES. The RRC Open Access Standard – Transmission Services is subject to approval of the RCA.

2.6.2 RRC Open Access Standard – Interconnection

The RRC establishes and enforces the standard for nondiscriminatory open access interconnection to the Transmission Network. The RRC Open Access Standard – Interconnection is subject to approval by the RCA.

2.7 Integrated Resource Planning

The RRC will periodically prepare a multiyear integrated resource plan (IRP) for meeting the reliability requirements of all customers within the Railbelt interconnected electric energy transmission network. The RRC’s IRP is subject to approval by the RCA, will be consistent with the obligations of an LSE, will satisfy the requirements of AS 42.05.780 and all applicable state regulations, and will meet the obligations and mission of the RRC.

2.8 Additions or Modifications

Reliability standards, as well as the RRC Open Access Standard – Transmission Services, may require additions or modifications to a system facility and may result in changes to BES facilities or construction of new transmission capacity or generation capacity on the Transmission Network at 69 kV and above. Additions and modifications to provide for the reliable operation of the Transmission Network or of a Transmission Network facility may be eligible for transmission cost recovery.

2.9 Transmission Cost Recovery Standard

The RRC establishes and administers a standard for cost recovery of additions and modifications to the Transmission Network, or new transmission or assets to provide...
transmission benefits that result from compliance with reliability standards, or IRPs. The RRC Transmission Cost Recovery Standard is subject to RCA approval.

2.10 Additional Information

Additional information regarding the services provided by the RRC is available on the RRC’s website www.akrrc.org.
3.0 OBLIGATIONS AND RESPONSIBILITIES

3.1 Registered Entity

3.1.1 RE Obligations

All REs interconnected with the Transmission Network are subject to the RRC tariff. Each RE shall comply with the requirements of the RRC standards for those operating and planning services provided by the RRC to which the RE is subject.

An RE is obligated to operate in conformance with the standards to which it is subject and will provide information requested by the RRC or required by the standard to substantiate compliance with the standard.

3.1.2 RE Responsibilities

Each RE will maintain current registration information with the RRC, including the RE’s designated point of contact and contact information. Each RE is responsible for supplying the RRC with operational information as required by the standard(s) to which the RE is subject and as requested by the RRC to support the RRC’s integrated resource planning services. An RE will provide any additional information requested by the RRC to fulfill the obligations of the RRC.

The RRC will make a good faith effort to notify each RE electronically about the proposed RRC budget, developed in accordance with Section 4.1 of this tariff, and will provide the location of the public documents that support a proposed budget filed with the RCA. It is the responsibility of each RE to submit comments, if any, through procedures supplied in such notices.

3.2 Load-serving Entity

3.2.1 LSE Obligations

LSEs interconnected with the Transmission Network, including an LSE otherwise exempt from RCA regulation under AS 42.05.711 or another provision of AS 42, are subject to the RRC tariff. An LSE shall comply with the RRC standards requirements and planning services.

An LSE is obligated to pay the RRC surcharge and other applicable charges in accordance with the tariff. The RRC surcharge, among other authorized dues and fees, will be used to fund all authorized operating activities of the RRC. The RRC surcharge periodically invoiced to each LSE is listed in the Schedule of RRC Surcharges.
3.2.2 LSE Responsibilities

An LSE will maintain current registration information with the RRC, including the LSE’s designated point of contact and contact information. An LSE will provide information requested by the RRC to fulfill the obligations of the RRC.

An LSE that owns, operates, or uses the Transmission Network and generates, transmits, distributes, or stores electric energy for direct compensation within the network may be subject to a reliability standard of the RRC. Each LSE that is subject to a reliability standard will register with the RRC in accordance with the procedures of the RRC.

An LSE must notify the RRC of all persons within an LSE’s service territory that are subject to a reliability standard or that may be subject to a reliability standard that the RRC may develop in the reasonably foreseeable future.

LSEs must participate in RRC integrated resource planning activities and processes that are developed to meet the reliability requirements of the Transmission Network. Each LSE will participate in such planning activities and processes regarding those aspects of the IRP that pertain to the LSE, or may affect the system or other LSEs.
4.0 RRC ADMINISTRATION

4.1 RRC Administrative Cost Determination – Budget

The RRC prepares forecasts of revenues and expenses that will be incurred in providing the services of the RRC. The forecasts and annual budgets are prepared under guidelines adopted by the RRC. Revenues will include receipts of the RRC, including penalties collected. The expenses will include the costs of general administration, developing reliability standards, compliance with and enforcement of reliability standards, integrated resource planning, and the costs associated with other authorized activities of the RRC.

4.2 Nonrecurring Charges

Reserved

4.3 Participation Dues

Reserved

4.4 RRC Surcharge

The annual budget of the RRC, as revised from time to time, will be allocated and assessed as a surcharge that will be invoiced to each participating LSE. The RRC Surcharge will be revised at least annually, and may be revised more frequently upon request to the RCA. The RRC Surcharge, and any revisions thereto, is subject to approval by the RCA with an effective date. Each LSE may implement a separate charge on its bill to retail customers to collect the RCA-approved RRC Surcharge. Implementation of the surcharge by the LSE is subject to the requirements of 3 AAC 46.420(f).

4.5 Surcharge Allocation

The annual RRC Surcharge will be allocated to an LSE on the basis of net energy for load in accordance with the RRC Equitable Allocation of Costs Rule (ER13). The surcharge that an LSE is allocated and assessed is shown in the Schedule of Surcharge.

For purposes of determining surcharge revisions, the RRC will maintain a surcharge balancing account and enter the balance into the surcharge calculation in accordance with 3 AAC 46.420(c)(1)-(4).

The RRC Surcharge is assessed to each individual LSE. The RRC surcharge and assessment may be revised if the number of LSEs should change.

4.6 Surcharge Billing Procedures

The RRC will prepare and send invoices to each LSE to collect the RRC Surcharge under an account structure defined by the RRC. The invoice will be in a format developed by the RRC.
and issued monthly. Invoices will be distributed electronically to the person, place, or contact designated by the LSE.

4.7 Surcharge Collection Procedures

Surcharge invoices are due and payable no later than thirty (30) days upon issuance. Payments may be submitted electronically by such means as may be identified on the invoice.

4.8 Surcharges Past Due and Delinquent

Surcharge invoice payments that are not received by the due date are subject to late fees. Surcharge invoice payments that are past due by more than thirty (30) days will be deemed delinquent, and LSE accounts over thirty (30) days due will be assessed interest charges. The Schedule of RRC Surcharge specifies late fees and interest charges to be assessed on delinquent accounts.
5.0 RELIABILITY STANDARDS

5.1 Applicability

The RRC establishes reliability standards that will provide for reliable operation of the interconnected electric energy transmission network. A UOO of the Transmission Network that generates, transmits, distributes, or stores electricity, including an entity exempt from other regulation under AS 42.05.711, is subject to the reliability standards. A UOO that is subject to a reliability standard shall register in accordance with the RRC entity registration program of the Compliance Monitoring and Enforcement Program Rule (ER2) adopted by the RRC.

An RE shall comply with any standard to which it is subject.

5.2 Cybersecurity and Physical Security – Confidentiality

A reliability standard for protection from a cybersecurity incident, or for the physical security of network facilities, may require withholding from public distribution certain information on the Transmission Network and facilities. Confidential information so designated associated with the Transmission Network and facilities may be disclosed only under those conditions addressed in the cybersecurity and physical security standards, and in accordance with the Compliance Monitoring and Enforcement Program Rule (ER2) Confidential Documents and Access Rule (ER4).

5.3 Reliability Standards Development and Notice

The RRC reliability standards are developed and implemented in accordance with the RRC bylaws, rules, and policies, as well as the RCA review and approval processes. Notice of standards development is available to the public on the RRC website and provided to Users, Owners, and Operators through alternative channels, as may be adopted by the RRC.

5.4 Schedule of Reliability Standards

The approved reliability standards of the RRC are entered in the Schedule of Reliability Standards. The Schedule of Reliability Standards includes new and revised standards as developed and implemented in accordance with the reliability standards development process.

5.5 Compliance

Compliance directives associated with each reliability standard are provided in the Compliance Monitoring and Enforcement Program Rule (ER2). Any RE to which a reliability standard applies is subject to the compliance directives of the reliability standard.
5.6 Monitoring

The RRC is authorized to monitor compliance in accordance with the Compliance Monitoring and Enforcement Program Rule (ER2). Any RE to which a reliability standard applies is subject to the monitoring conditions of the reliability standard.

5.7 Conflicts – Identification and Resolution

Conflicts relating to a reliability standard with other tariff conditions are subject to resolution in accordance with Section 1.3 of this tariff. Conflicts that involve confidential information will be additionally subject to administrative procedures of the Confidential Documents and Access Rule (ER4).

If, as a condition of a contract with the U.S. Department of Defense, a UOO is subject to a federal standard, rule, or function that conflicts with a reliability standard, the UOO shall comply with the federal standard, rule, or function until the conflict is resolved.

5.8 Determination of Monetary Penalties

Monetary penalties associated with a reliability standard will be determined through the reliability standards development process and incorporated in the pertinent reliability standard.

5.9 Penalty Matrix

Monetary penalties associated with a violation of a reliability standard, as such violation is characterized in the reliability standard, may include, as appropriate, a matrix of violation risk factors and violation severity levels that reflect the size of a penalty associated with a violation of a reliability standard.

5.10 Penalty Imposition and Assessment

Penalties imposed by the RRC for violations of a reliability standard will be noticed and processed in accordance with 3 AAC 46.120 and the Compliance Monitoring and Enforcement Program Rule (ER2). Penalties may be monetary or nonmonetary and may include a limitation on an activity, function, operation, or other sanction as identified in the notice.

5.11 Nonmonetary Penalties or Sanctions

Reserved
5.12 Completion of Enforcement Action

The RRC will prepare and send an invoice to each entity assessed a monetary penalty. The invoice will be in a format developed by the RRC and submitted contemporaneously with a notice of penalty.

Monetary penalty invoices are due and payable no later than thirty (30) days upon issuance. Payments may be submitted electronically by such means as may be identified on the invoice. Certification by RRC of the payment of a monetary penalty will constitute completion of enforcement action.

Completion of enforcement action on a nonmonetary penalty enforcement will be certified in accordance with the terms and conditions of the nonmonetary penalty or sanction.

5.13 Waivers

Reserved

5.14 Appeals

An entity subject to a penalty imposed by the RRC may appeal the penalty amount or imposition to the RCA not later than ten (10) business days after receiving notice of the penalty. Such appeal shall be conducted in accordance with 3 AAC 46.140. Monetary penalties that are appealed remain due and payable under Section 5.12 unless stayed by the Commission pursuant to 3 AAC 46.140(c) but will be held in trust pending resolution of such appeal and will be subject to the terms of resolution.
6.0  RRC OPEN ACCESS STANDARD – TRANSMISSION SERVICES

6.1  Applicability

The RRC Open Access Standard – Transmission Services addresses the rights and responsibilities of transmission owners and transmission users.

6.2  Transmission System Defined

Reserved

6.3  Eligible Entities

Reserved

6.4  Open Access Standard Development and Notice

The RRC Open Access Standard – Transmission Services is developed and implemented in accordance with the RRC bylaws, rules, and policies, as well as the RCA review and approval processes. Notice of the standard development is available to the public on the RRC website and provided to Users, Owners, and Operators through alternative channels, as may be adopted by the RRC.

6.5  Schedule of RRC Open Access Standard - Transmission Services

The authorized and approved RRC Open Access Standard - Transmission Services is entered in the Schedule of RRC Open Access Standard – Transmission Services. The Schedule of RRC Open Access Standard – Transmission Services includes new and revised content of the standard as developed and implemented in accordance with the standards development process of the RRC.

6.6  Transmission Services Rates and Charges

The RRC Open Access Standard – Transmission Services includes provision for the establishment of rates, terms, and conditions of granting and providing transmission services on the Transmission Network.

6.7  Compliance and Monitoring

Any entity to which the RRC Open Access Standard – Transmission Services applies is subject to the compliance and monitoring conditions of the standard.
7.0 **RRC OPEN ACCESS STANDARD – INTERCONNECTION**

7.1 **Applicability**

The RRC Open Access Standard – Interconnection addresses the rights and responsibilities of transmission Users, Owners, and Operators with respect to transmission interconnection, and the responsibility of owners and operators to ensure nondiscriminatory transmission interconnection.

7.2 **Transmission System Defined**

Reserved

7.3 **Eligible Entities**

Reserved

7.4 **Open Access Standard Development and Notice**

The RRC Open Access Standard – Interconnection is developed and implemented in accordance with the RRC bylaws, rules, and policies, as well as the RCA review and approval processes. Notice of the standard development is available on the RRC website and provided to Users, Owners, and Operators through alternative channels, as may be adopted by the RRC.

7.5 **Schedule of RRC Open Access Standard - Interconnection**

The authorized and approved RRC Open Access Standard – Interconnection is entered in the Schedule of RRC Open Access Standard – Interconnection. The Schedule of RRC Open Access Standard – Interconnection includes new and revised content of the standard as developed and implemented in accordance with the standards development process of the RRC.

7.6 **Interconnection Rates and Charges**

The RRC Open Access Standard – Interconnection includes provision for the establishment of rates, terms, and conditions for interconnection with the Transmission Network.

7.7 **Compliance and Monitoring**

Any entity to which the RRC Open Access Standard – Interconnection applies is subject to the compliance and monitoring conditions of the standard.
8.0 INTEGRATED RESOURCE PLANS

8.1 Integrated Resource Plan Requirements

The RRC is authorized to develop IRPs in accordance with AS 42.05.780, 3 AAC 46.230, and 3 AAC 46.250. An IRP must address the forecast period and include resource portfolios, including a preferred portfolio, each of which must comply with the RRC reliability standards and the requirements of the RRC certificate.

8.2 Applicability

The IRP of the RRC will reflect the entirety of the Transmission Network and will identify resource options, resource portfolios, and, as applicable, specific projects or project portfolios without regard to service territory boundaries within the Transmission Network.

8.3 Integrated Resource Plan – Action Plan

The RRC will develop an IRP Action Plan that provides a process for implementing the preferred resource portfolio and includes a process by which LSEs of the BES determine how they will apportion cost responsibility for the measures that satisfy the needs identified in the IRP.

8.4 Integrated Resource Planning Costs

The costs of the RRC’s integrated resources planning will be included in the surcharge allocated and assessed under sections 4.4 and 4.5 and reflected in the Schedule of Surcharge. The RRC will maintain records of the RRC’s integrated resources planning costs, among other activities, in accordance with the Documents Retention and Access Rule (ER3).
9.0 ADDITIONS AND MODIFICATIONS

9.1 Applicability

The RRC reliability standards, RRC Open Access Standard – Transmission Services, and RRC Open Access Standard – Interconnection, may provide for additions or modifications to a BES facility to the extent necessary to provide for reliable operation of the Transmission Network. Such additions and modifications may result in changes to BES facilities or construction of new transmission capacity or generation capacity.

The IRP Action Plan will identify the necessary additions or modifications to implement the plan.

9.2 Additions

Additions include network components and facilities that are constructed or implemented on the Transmission Network. Additions may include components, facilities, and equipment of a UOO if the absence of the addition will adversely affect the reliable operation of the BES.

9.3 Modifications

Modifications include changes to network components, facilities, or operating characteristics of the Transmission Network. Specifically, modifications may include those changes to components, facilities, and equipment of a UOO if the absence of the modification will adversely affect the reliable operation of the BES.

9.4 Cost Responsibility – Reliability Standards and Open Access Standards

The cost of additions and modifications required under the RRC reliability standards, RRC Open Access Standard – Transmission Services, and RRC Open Access Standard – Interconnection that are necessary to provide for the reliable operation of the Transmission Network will be the responsibility of the RE that is required to provide the addition or modification.

9.5 Cost Responsibility – Integrated Resource Plan

The Action Plan of an approved IRP will provide the processes for (1) the determination of the entities that will be involved in the procurement of additional generation, transmission, battery storage, and conservation or similar investments in efficiency to meet the requirements of the Transmission Network, and (2) the apportionment by the LSEs of the cost responsibility for the measures in a preferred resource portfolio that satisfy the needs identified in an IRP.
10.0 TRANSMISSION COST RECOVERY STANDARD

10.1 Purpose

The RRC Transmission Cost Recovery Standard will provide for recovery of transmission system costs in accordance with 3 AAC 46.450.

10.2 Applicability

The Transmission Cost Recovery Standard will apply to the costs of transmission assets among Users, Owners, and Operators of the BES. The standard will consider the additions and modifications addressed in Section 9.0.

10.3 Transmission Cost Recovery Standard Development and Notice

The RRC Transmission Cost Recovery Standard is developed and implemented in accordance with the RRC bylaws, rules, and policies, as well as the RCA review and approval processes. Notice of the standard development is available to the public on the RRC website and provided to users, owners, and operators of the BES through alternative channels, as may be adopted by the RRC.

10.4 Transmission Cost Allocation

The Transmission Cost Recovery Standard provides methodologies for addressing transmission costs that ensure the costs are allocated to those that derive benefits from the transmission system in a manner that is generally commensurate with the estimated benefits derived from the transmission system. Only the costs of assets that provide transmission benefits will be included.

10.5 Schedule of Transmission Cost Recovery Standard

The authorized and approved RRC Transmission Cost Recovery Standard is entered in the Schedule of Transmission Cost Recovery Standard. The Schedule includes new and revised content of the standard as developed and implemented in accordance with the RRC standards development process.
Railbelt Reliability Council

SCHEDULE OF NONRECURRING CHARGES

Reserved
Railbelt Reliability Council

SCHEDULE OF PARTICIPANT DUES

Reserved
**Railbelt Reliability Council**

**SCHEDULE OF RRC SURCHARGE**

<table>
<thead>
<tr>
<th>Load-serving Entity</th>
<th>Annual Surcharge $</th>
<th>Invoice $/mo.</th>
<th>Purpose or Effect</th>
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<tbody>
<tr>
<td>Chugach Electric Association, Inc. (CEA)</td>
<td>655,423.63</td>
<td>54,618.64</td>
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<tr>
<td>Golden Valley Electric Association, Inc. (GVEA)</td>
<td>407,785.62</td>
<td>33,982.13</td>
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<tr>
<td>Homer Electric Association, Inc. (HEA)</td>
<td>157,277.26</td>
<td>13,106.44</td>
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</tr>
<tr>
<td>Matanuska Electric Association, Inc. (MEA)</td>
<td>258,624.33</td>
<td>21,552.03</td>
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</tr>
<tr>
<td>City of Seward, dba Seward Electric System (SES)</td>
<td>20,324.16</td>
<td>1,693.68</td>
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</table>

**LATE FEES:** One percent on past due amount (1.0%)

**INTEREST ON DELINQUENT ACCOUNTS:** Legal Rate of Interest, AS 45.45.010 (10.5% per annum)
SCHEDULE OF RELIABILITY STANDARDS

The initiating entry on the Schedule will be: “RRC Reliability Standards – Exhibits”

Each reliability standard will be identified as: “RRC Reliability Standard – 001: Title”

Reliability Exhibits and Standards will paginate as: “RRC-RS Exhibits Original Page 1”
“RRC-RS-001 Original Page 1”

Additional pages of a Standard will paginate as: “RRC-RS Exhibits Original Page 1.1”
“RRC-RS-001 Original Page 1.1”

RRC Reliability Standard General Format:

A. Introduction
B. Requirements
   R1, R2, Rn
C. Measures
   M1, M2, Mn
D. Compliance
   1. Compliance Monitoring Process
   2. Levels of Noncompliance – A
   3. Levels of Noncompliance – B
E. Regional Differences

Attachments
SCHEDULE OF RRC OPEN ACCESS STANDARD – TRANSMISSION SERVICES

The initiating entry on the Schedule will be: “RRC Open Access Standard – Transmission Services”

The Standard will be paginated as: “RRC-OAS – Services Original Page 1”
“RRC-OAS – Services Original Page 2”

Additional pages of the Standard will paginate as: “RRC-OAS – Services Original Page 1.1”
“RRC-OAS – Services Original Page 2.1”

RRC Open Access Standard – Transmission Services General Format:

Exhibits/Definitions

A. Introduction

B. Requirements
   R1, R2, Rn

C. Measures
   M1, M2, Mn

D. Compliance
   1. Compliance Monitoring Process
   2. Levels of Noncompliance

Attachments
SCHEDULE OF RRC OPEN ACCESS STANDARD – INTERCONNECTION

The initiating entry on the Schedule will be: “RRC Open Access Standard – Interconnection”

The Standard will be paginated as: “RRC-OAS – Interconnection Original Page 1”
“RRC-OAS – Interconnection Original Page 2”

Additional pages of the Standard will paginate as: “RRC-OAS – Interconnection Original Page 1.1”
“RRC-OAS – Interconnection Original Page 2.1”

RRC Open Access Standard – Interconnection General Format:

A. Exhibits/Definitions
B. Introduction
C. Requirements
   R1, R2, Rn
D. Processes
   P1, P2, Pn
E. Measures
   M1, M2, Mn
F. Compliance
   1. Compliance Monitoring Process
   2. Levels of Noncompliance

Attachments
Railbelt Reliability Council

SCHEDULE OF TRANSMISSION COST RECOVERY STANDARD

Reserved
EXHIBIT B
### Director Meeting Fees

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost Per Meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board meetings - Meeting Fees</td>
<td>$108,548</td>
</tr>
<tr>
<td>Executive Assistant - 11/1/2023</td>
<td>$173,677</td>
</tr>
<tr>
<td>For Two Attorneys</td>
<td>$29,525</td>
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### Contract Services

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost Base</th>
<th>Quantity/ Months</th>
<th>Subtotal</th>
<th>Frequency</th>
<th>2022 Cost</th>
<th>2023 Cost</th>
<th>Explanation</th>
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<tbody>
<tr>
<td>Director Search</td>
<td>$10,400</td>
<td>1</td>
<td>$10,400</td>
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</tr>
<tr>
<td>assumes $250/hr to vet candidates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Assistant - 11/1/2023</td>
<td>$22,176</td>
<td>1</td>
<td>$22,176</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2022 estimate is based on 4 hours at $22,176</td>
<td></td>
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<td>2023 estimate is based on 4 hours at $22,176</td>
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<tr>
<td>Executive Assistant Change - 11/1/2023</td>
<td>$18,000</td>
<td>1</td>
<td>$18,000</td>
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<tr>
<td>2022 estimate is based on 4 hours at $18,000</td>
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<tr>
<td>2023 estimate is based on 4 hours at $18,000</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Website Maintenance</td>
<td>$7,500</td>
<td>1</td>
<td>$7,500</td>
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<td>assumes 15 hours at $500/hour</td>
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<td>2023 estimate is based on 10 hours at $500/hour</td>
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</tbody>
</table>

### Office Costs

<table>
<thead>
<tr>
<th>Description</th>
<th>Frequency</th>
<th>2022 Unit Cost</th>
<th>2023 Unit Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internet fees</td>
<td>per month</td>
<td>$11,300</td>
<td>$11,300</td>
</tr>
<tr>
<td>Office furniture</td>
<td>per employee</td>
<td>$2,000</td>
<td>$2,000</td>
</tr>
<tr>
<td>Office supplies</td>
<td>per employee</td>
<td>$1,900</td>
<td>$1,900</td>
</tr>
<tr>
<td>Work-related meals</td>
<td>per employee</td>
<td>$1,800</td>
<td>$1,800</td>
</tr>
<tr>
<td>Office supplies</td>
<td>per employee</td>
<td>$1,000</td>
<td>$1,000</td>
</tr>
<tr>
<td>Office furniture</td>
<td>per employee</td>
<td>$1,000</td>
<td>$1,000</td>
</tr>
<tr>
<td>Office support</td>
<td>per employee</td>
<td>$1,000</td>
<td>$1,000</td>
</tr>
</tbody>
</table>

Total for Fiscal Year 2023: $48,910

### Financial Summary

- **Total Revenues:** $48,910
- **Total Expenses:** $48,910
- **Net Income:** $0

September 23, 2023
EXHIBIT C
WHEREAS, pursuant to 3 AAC 46.160(b), the Railbelt Reliability Council (RRC) has prepared a proposed budget for fiscal year 2023, based on the RRC’s assumption that the RRC’s initial tariff will take effect June 1, 2023, for submission to the Regulatory Commission of Alaska (“Commission”);

WHEREAS, pursuant to 3 AAC 46.430(c)(1), the RRC is required to submit a board resolution authorizing the proposed budget when it files its surcharge filing; and

WHEREAS, the members of the RRC Board have reviewed and wish to approve the proposed budget for fiscal year 2023 for filing with the Commission; now, therefore be it

RESOLVED, that the Board, in accordance with the Bylaws and policies of the RRC, does hereby authorize the RRC’s proposed budget for fiscal year 2023.

The undersigned hereby certifies that he is the duly elected and qualified Secretary and the custodian of the books and records of the Railbelt Reliability Council, a corporation duly formed pursuant to the laws of the state of Alaska, and that the foregoing is a true record of a resolution duly adopted at a meeting of the Board of Directors and that said meeting was held in accordance with state law and the Bylaws of the above-named Corporation on November 7, 2022, and that said resolution is now in full force and effect without modification or rescission.

IN WITNESS WHEREOF, I have executed my name as Secretary this day November 7, 2022.

________________________________
By: Joel Groves