



Transmission Services

Customer Comments on Short-Term Preemption & Competition for Transmission Rights

Comment Received from
Emerald Public Utility District
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Bonneville Power Administration – Transmission Services (BPAT)
TechForum@BPA.gov

Subject: Short Term Preemption & Competition for Transmission Rights

EPUD is concerned that implementation of Short Term Preemption & Competition in its standard form may have serious unintended consequences that can adversely impact scheduling processes, create reliability issues, impair transmission resale markets, and result in additional costs. Given that BPA has been providing efficient and reliable transmission service to its customers under its flow gate-based system, EPUD asks BPA to reexamine its decision to implement Short Term Preemption & Competition until all costs and benefits are thoroughly analyzed.

Specifically, EPUD cites the following issues with Short Term Preemption & Competition:

1. Automation and system impact:
 - a. Under BPAT's flow gate-based system a single transmission request often has an impact on multiple flow gates, thus increasing complexity in identifying defenders and potentially impacting multiple customers/requests
 - b. Large volume of transmission requests (original, redirect, resale) increases complexity of identifying all possible defenders
2. Impact on NT load serving entities:
 - a. Non-firm NT transmission requests that are often used to schedule market purchases to serve NT customers' loads can be preempted by challengers' short-term firm PTP requests
3. Market impact:
 - a. The short-term competition bumping rules will undermine the efficiently designed system that allows for minimal schedule interruption throughout all time intervals and transmission priority.
 - b. BPA's robust transmission resale market may get disrupted due to uncertainty when redirecting short-term requests within conditional window
 - c. Small NT customers marketing their excess power as well as small PTP utilities marketing their excess power or serving their loads will either have to incur additional transmission costs by matching challengers' requests or not being able to compete against large (in MW and duration) marketers' transmission service requests. This would put unnecessary financial burden on smaller utilities.
 - d. The short-term competition unconditional window timelines will adversely impact day-ahead scheduling activity when daily and hourly PTP short-term requests can be challenged before 2 p.m. on a pre-schedule day. This creates huge uncertainty for scheduling and places a great burden on dealing with challengers while also having to meet scheduling deadlines.
 - e. BPAT's costs of implementation will certainly be passed to all customers. Benefits of short-term competition market are questionable at this point.

Sincerely,

Kyle Roadman
Power Resources Coordinator
Emerald PUD