



Transmission Services

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

Comment Received from
Iberdrola Renewables
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From: Korver, Jan [mailto:Jan.Korver@iberdrolaren.com]
Sent: Thursday, March 29, 2012 2:33 PM
To: Tech Forum
Subject: IBR comments: Short-term and Hourly Competitions

Iberdrola Renewables appreciates the information presented at Bonneville's March 1 workshop and Bonneville's efforts to follow through on BOATT process commitments. Early in the BOATT process, BPA identified short-term competitions as one among several FERC pro-forma OATT provisions that could be achieved through automation. As BPA has explored with customers the details of the anticipated implementation, it is apparent that short-term competitions in BPA's robust resale market could have many unintended consequences. The ability to resell and/or redirect firm transmission rights will be affected, and schedulers will be required to unwind schedules after the end of the scheduling day, ultimately affecting both reliability and commercial transactions. In contrast to the pro-forma practice as described, many aspects of BPA's current practice appear superior to the pro-forma OATT, enabling a more efficient use of available capacity.

Iberdrola recommends continued participation in the NAESB subcommittee, and postponing further regional discussion until the NAESB regulations have been clarified.

Thank you.

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Transmission Origination

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