



Transmission Services

Customer Comments on Tariff Automation Efforts

Comments Received from
Seattle City Light
June 8, 2012

Posted July 6, 2012



City of Seattle

Your Seattle City Light

June 8, 2012

Bonneville Power Administration – Transmission Services (BPAT)
TechForum@BPA.gov

Subject: Tariff Automation

Seattle City Light (Seattle) appreciates the opportunity to provide comments in response to The Bonneville Power Administration Transmission Services' request following its May 16, 2012 meeting on Open Access Transmission Tariff Automation.

Seattle wishes to reiterate its concerns regarding the schedule for Short-term Preemption & Competition (P&C). Seattle believes that BPA should allow the NAESB standards development process and associated FERC approval process to come to completion before it begins implementing P&C. BPA also needs to develop a schedule that takes into account, among other things, customers internal requirements to implement changes resulting from the automation process. Customers require time to review staffing, automation adequacy, software development, testing and training. For example, assuming Seattle's vendor could commence a development cycle immediately upon Seattle's request, Seattle's vendor will likely require a minimum of six months to scope, code, and test new software.

BPA has raised questions and described the issues for each of the automation projects assuming no interaction between the automation efforts. However, there are interactions (e.g. P&C and Simultaneous Submission Windows (SSW)). Seattle believes it is necessary for BPA to reevaluate business process impacts resulting from those interactions and adjust the business rules accordingly to minimize, or preferably eliminate, market disruptions and the potential for negative impacts to reliability.

See *also* Seattle's March 30, 2012 comments to BPA on Short-Term Preemption & Competition for Transmission Rights and Seattle's April 30, 2012 to FERC in Docket NJ12-7, BPA Transmission Service Terms and Conditions.

Seattle's additional comments below are shown in ***bold italics***.



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A. Posting of Equivalent ATC

This effort is to post ATC/TTC values for all "posted paths" and will comply with FERC Order 890 which requires TPs using flowgate methodology to convert AFC/TFC values to path ATC/TTC values.

Project Lead: Huy Nguyen, hdnguyen@bpa.gov

In addition to general comments, please address the following:

1. Please identify your preference for where the Equivalent ATC/TTC values are posted on OASIS (eg, under Sys Data, Offerings, or somewhere else)? **Offerings.**
2. How often do you foresee using this capability? **Limited use.**
3. What benefit do you see this capability provides? **It provides another tool.** Do you foresee any changes to your business by having this capability? **It provides a starting point for viewing availability.**
4. Do you have any other comments or suggestions about our proposed approach? **Not at this time. As further details are developed, Seattle may have further comments.**
5. Do you feel further customer workshops and/or conference calls are necessary for this project, other than the planned discussions at the monthly CBPI Conference Call? **Only to the extent it affects P&C.**

B. Conditional-Firm Resales and Redirects

To support pro forma compliance, BPA will be removing restrictions to redirects and resales of CF.

Project Lead: Pete Lee, pblee@bpa.gov

In addition to general comments, please address the following:

1. CF service may be resold during the time that it has Priority 6 scheduling rights. Child resale "firm ups" occur as if they are still part of the parent CF service. In the event where partial STF capacity remains to "firm up" some (but not all) of the children, what is the most equitable way to distribute this remaining capacity? Should it be based on queue time of the resale or some other criteria? We are not aware of any guidance from FERC or NAESB on this matter. **Seattle has no comments at this time.**
2. CF service uses specific contract exhibits. Should an assignor be prohibited from reselling service to an assignee who has not signed the contract agreement? Why or why not? **Seattle has no comments at this time.**
3. How do you see this capability changing how you do business? **Seattle has no comments at this time.**
4. Do you feel further customer workshops and/or conference calls are necessary for this project, other than the planned discussions at the monthly CBPI Conference Call? **Only to the extent it affects P&C.**



C. Non-firm Products for Daily / Weekly / Monthly

This effort is to define new Non-firm Products for Daily, Weekly and Monthly horizons and to implement the automation of these offerings for use by September 2012.

Project Lead: Greg O'Shea, gmoshea@bpa.gov

In addition to general comments, please address the following:

1. Please review the proposed product definition attributes from the slides. Do you have any concerns about how BPA proposes to define these products? **Seattle has no comments at this time.**
2. How often do you foresee using these products? How will the availability of these products change how you do business? **If Firm service becomes limited and if BPA prices Non-firm lower than Firm, Seattle would explore using these products.**
3. Do you feel further customer workshops and/or conference calls are necessary for this project, other than the planned discussions at the monthly CBPI Conference Call? **Seattle has no comments at this time.**

D. Simultaneous Submission Windows (SSW)

This effort includes defining a time period during which all requests submitted will be considered to have been submitted "simultaneously". This also includes the selection of a methodology for allocating constrained capacity other than first-come, first served during the simultaneous window.

Project Lead: Mike Steigerwald, mlsteigerwald@bpa.gov

In addition to general comments, please address the following:

1. Would you prefer a fixed or rolling start to the simultaneous window? **Fixed.**
2. What window duration is preferred for each of the transmission services? Remember, FERC requires a minimum of 5 minutes. **Five minutes is acceptable, however to the extent other automation activities affect this window, Seattle would like to revisit the question.**
3. The window is required for Firm. Should we optionally subject non-Firm to the simultaneous window also? **Yes.**
4. Which transmission allocation should we use? **Pro-rata.** Please provide a rationale for your choice. If there are options you specifically do NOT want us to consider, please indicate why. **Pro-rata enables some portion of a transaction to remain in place. BPA should not consider a lottery because the unsuccessful party will lose the transmission capacity on that path and will be required to unwind 100% of the associated energy/capacity transaction.**
5. Do you support the change to split BPA's Hourly market opening to have Firm open at 9:00am and non-Firm remain at 10:00am? **Yes. However, this question may need to be revisited due to interactions between SSW and P&C.**



6. Currently, the market opens for many of BPA's transmission services at midnight. One customer requested that we move these to a new time (e.g., 6:00am). Do you support such a change? **Yes**. If so, which services and which time do you prefer? ***Weekly or longer Transmission Service Request should commence during typical business hours while shorter term requests could start earlier.***
7. How do you see this capability changing how you do business? ***It may require automation.***
8. Do you feel further customer workshops and/or conference calls are necessary for this project, other than the planned discussions at the monthly CBPI Conference Call? **Yes**. ***Seattle suggests that BPA hold workshops specifically covering (a) How AFC analysis could be performed for the pro-rata option , (b) Discussion and explanation of the detailed business processes and detailed software functionality and (c) the interrelationship between SSW and P&C, timing and notifications.***

Seattle has observed that BPA has assumed no interaction between P&C and SSW, but they are related and will add new steps to BPA's business processes. Seattle and BPA's other customers will need detailed information on how these processes will work in order to evaluate the adequacy of our existing staff and systems and the need for any changes.

E. Short-term Preemption and Competition

Project Lead: Bob Zerfing, razerfing@bpa.gov

For this particular effort, there are no specific questions at this time. The initial focus will be on evaluating the functionality of OATI's Preemption and Competition Module (PCM). A schedule for upcoming customer meetings along with corresponding agendas is being produced and will soon be shared. BPA will explore the issues raised by preemption and competition and examine the impacts to regional business models. Concurrent with BPA's regional discussion on the topic, BPA will also be participating with the North American Energy Standards Board (NAESB) OASIS subcommittee which is addressing the same topic. Both the evaluation of the PCM module and participation in NAESB will help inform and shape BPA's ultimate specification and implementation.

In addition to BPA accounting for changes coming from NAESB updating the standards, BPA will need to provide (a) details on the functionality and requirements of vendor automation as it would operate "off the shelf," (b) how it compares to the unique tariff features that BPA has in its product offerings, and (c) sufficiently detailed business processes that will allow customers to review their internal business processes to identify which tasks will require automation and which may continue with manual processes.



Please see also initial comments in this document and comments to Simultaneous Submission Windows.

Respectfully submitted,



Robert W. Cromwell, Jr, Director
Power Contracts & Resource Acquisition
Seattle City Light

RC:mls

cc: Toni Timberman, BPAT - Portland



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