



## Transmission Services

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### Conditional Firm Transmission Service (CFS) Version 13

#### Response to Customer Comments

Posted: March 16, 2012

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Conditional Firm Transmission Service, Version 13, Business Practice posted for review from February 17, 2012 through March 13, 2012.

In Order 890, FERC provided for Conditional Firm. BPA implemented Bridge CFS with the Number of Hours option in 2009. The business practice has been revised to incorporate the System Conditions option and provide the details for offering System Conditions Conditional Firm Service. As a result of Powerex's comment (see below) step G.1.c.i was added to the Business Practice.

Thank you for your comments.

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#### 1. Powerex

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BPA has added Section G.1.c, which states: "When Conditional Curtailment occurs, the Customer must reduce the generator associated with Conditional Firm by the amount of the Conditional Curtailment for the period of the Conditional Curtailment."

Powerex is concerned this language could be misconstrued to mean BPA can require a generator outside its BA to reduce its output. Furthermore, the addition of G.1.c is unnecessary as the existing Section G.4.b sufficiently describes the required procedure: "When a Conditional Curtailment occurs, no alternate E-tags are allowed for the portion of the generator(s) that were curtailed."

Powerex requests either 1) BPA remove Section G.1.c altogether as its meaning is already captured in Section G.4.b.; or 2) BPA modify the language in G.1.c to clarify it cannot require any generator outside its BA to reduce output.

#### Transmission Service's Response

The language in G.1.c is intended to provide BPA with a known amount of relief at a flow gate based on the PTFDF of the reservation path. If the Transmission Contract Holder (TCH) has multiple points of interconnection between their BAA and BPA's BAA, allowing the TCH to curtail any of their resources within their BAA for a Conditional Curtailment would result in different PTFDFs depending on which point of interconnection the resource is associated with. To the extent, though, that there is only one point of interconnection between the source BAA of the Condition Firm Service reservation and BPA's BAA, then any resource reduced for the Conditional Curtailment in the source BAA will have the same PTFDF impact on BPA's BAA. Additional language has been added as G.1.c.i to the business practice to make this clarification.