



## Transmission Services

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### Network Integration (NT), V4, and Requesting Transmission Service, V9, Business Practices

#### Response to Customer Comments

Posted: February 22, 2012

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Network Integration (NT), V4, and Requesting Transmission Service, V9, Business Practices posted for review from December 16, 2011 through January 18, 2012.

Thank you for your comments.

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## 1. Flathead Electric

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Flathead supports the changes to the NT Business Practice and the Requesting Transmission Service Business Practice to offer NT customers the same Short-Term Firm opportunities currently available to PTP customers.

My only concern is that BPA not create unnecessary barriers for BPA Power Services to operate efficiently as they do currently and would support any comments that BPA Power Services submits.

### Transmission Service's Response

Thank you for your comments.

Enabling NT Customers to designate Network Resources for a short-term duration should not create any barriers to generator operations. Rather, the use of a short-term NT product should provide additional options for serving Network Loads on Firm NT Service.

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## 2. Eugene Water and Electric Board (EWEB)

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EWEB appreciates the work BPA Transmission has been doing on modifying its NT business practices and policies to meet the needs of its NT customers. We support and encourage your continued efforts on ensuring BPA is able to comply with its tariff obligations to provide load service to its NT customers. The proposed changes to the Short Term Firm product are one example of such work and we support those changes.

EWEB is very pleased with the Short Term Firm Product Business Practice. The only feedback we have comes from our trading floor who recommends BPA work to streamline the paperwork and consider not having to submit an undesignation form when the designation form identifies a begin and end date/time.

### Transmission Services' Response

Thank you for your comments.

In order to obtain Short-Term Firm NT Service, an undesignation form is not required.

When designating a Network Resource for a short-term duration, the NT Customer will need to identify the start and stop dates of the designation. Upon reaching the stop date, the designation of the Network Resource will terminate.

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## 3. Clark County PUD

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Clark appreciates the effort and commitment by BPA Transmission to modify and improve its NT business practices and policies to meet the needs of its NT customers. We support and encourage your continued efforts to ensure that BPA is able to plan and build the transmission system in order to meet its Tariff obligations for NT service. We see this as an ongoing process and believe that future discussions will serve to resolve objections we might have to practices described in these business practices. We would like to specifically point out our support and gratitude for the implementation of Short Term Firm products.

Clark is very pleased with the Requesting Transmission Services V9 business practice and would provide only the following comments at this time: we encourage BPA to streamline the paperwork process to the extent possible and it appears that there are references to Customer Served Load within the business practice which could be removed.

#### [Transmission Services' Response](#)

[Thank you for your comments.](#)

[Due to the recent expiration of the Customer Served Load \(CSL\) concept, BPA will remove any references to CSL from the Requesting Transmission Service Business Practice.](#)

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#### **4. Northwest Requirements Utilities (NRU)**

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Northwest Requirements Utilities (NRU) represents the interests of 50 load following BPA customers that all use NT transmission to serve their loads. We appreciate the work BPA Transmission has been doing on modifying its NT business practices and policies to meet the needs of its NT customers, particularly in the new world of Regional Dialogue. We support and encourage your continued efforts on ensuring BPA is able to comply with its tariff obligations to provide load service to its NT customers. The proposed changes to the Short Term Firm product are one example of such work and we support those changes.

We work ask that you work to make sure STF paperwork processing is as streamlined as possible to maximize the usefulness of this product offering.

#### [Transmission Services' Response](#)

[Thank you for your comments.](#)

[BPA will continue to look at possibilities in streamlining processes to make the requesting of transmission service more efficient.](#)

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#### **5. PNGC Power**

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PNGC appreciates the work BPA Transmission is doing to develop and implement NT business practices and policies to meet the needs of its NT customers. We support and encourage your continued efforts to work with NT customers as we try to implement our new Regional Dialogue power sales contracts, both Slice and Load Following. As NT customers, our goal is reliable load service. The proposed changes to the Short Term Firm product are one example of BPA's good work in this area and we support those changes. We encourage BPA to work expeditiously to develop and implement other changes that are needed so that NT customers can bring non-federal as well as federal resources in both the long and short term.

#### [Transmission Services' Response](#)

[Thank you for your comments.](#)

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#### **6. BPA Power Services**

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1. The business practice proposes requires that the Network Resource Designation Form (Attestation) to be submitted for all increments of NT service, especially if the NT request

is Confirmed. The window for the Attestation submittal is "no later than 5:00 PM, PPT on the same Business Day in which the NT TSR is QUEUED" (section D.1.e in the NT Transmission Service business practice). This works for most all increments of requests, except for Hourly NT requests that are queued after 5:00 PM. Please clarify the window to submit Attestations for Hourly NT DNR requests that occur after

#### Transmission Services' Response

Thank you for your comments.

BPA will clarify the NT Business Practice to note that the Network Resource Designation Form, for designations of Network Resources on a short-term basis, should be submitted on the earlier of 5 pm of the same business day or before delivery.

2. Also, does the Network Resource Designation Form submittal procedures remain the same regardless of whether "preconfirmed" is selected on the request? This preconfirmed feature is part of the requests template.

#### Transmission Services' Response

Yes, the Network Resource Designation Form procedures and informational requirements remain the same.