



Transmission Services

Balancing Service Election for DERBS and VERBS Business Practice, Version 2

Response to Customer Comments

Posted: September 30, 2013

This document contains the Transmission Customer comments and Transmission Services' response to those comments for Balancing Service Election for DERBS and VERBS Business Practice, Version 2, posted for review from August 27, 2013 through September 11, 2013.

Thank you for your comments.

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- A. Section F2 of BPA's draft business practice regarding the Balancing Service Election for DERBS and VERBS states that only 1550 MW of generation (nameplate) will be allowed to change election mid-rate period, which will be offered on a first-come, first-serve basis. Powerex suggests that BPA advise customers of the process it intends to follow to track the mid-rate period elections it receives, and to ensure that they are awarded on a first-come, first-serve basis.

Transmission Service's Response

Requests to change elections by the mid-rate period election deadline are to be sent to techforum@bpa.gov. This will date and timestamp the receipt of the request. The request will then be distributed internally to the appropriate parties. The Business Practice will be updated to add this clarification.

- B. Powerex notes that the Balancing Service Election Business Practice refers to a Self-Supply Business Practice; however, the Self-Supply Business Practice has not yet been developed. Powerex urges BPA to develop the Self-Supply Business Practice as quickly as possible so that customers will have sufficient time to pursue self-supply opportunities, enter into contractual arrangements, and obtain the necessary approvals, etc., in order that they can make a meaningful mid-rate period election. Powerex also notes that it is difficult to comment fully on the Balancing Service Election Business Practice in absence of the requirements yet to be determined in the Self-Supply Business Practice, and may have further comments at that time.

Transmission Service's Response

There has been considerable internal and external work on the Self Supply Business Practice. Specifically, presentations on the on self supply were conducted at the February 5, 2013 and February 19, 2013 ACS Practices Forum. These presentations led to a presentation of a draft of the Self Supply business practice on March 19, 2013 at the ACS Practices Forum. This provided customers with a first review of the requirements for self supply and the ability to provide comments on the business practice itself. These presentations can be found at http://transmission.bpa.gov/customer_forums/acs/default.cfm?page=meetings. After the customer elections on April 12, 2013, BPA learned that no customer had elected Self Supply for the first year of the 2014-15 rate period therefore development of the Self Supply Business Practice was prioritized accordingly. As the start of the rate period approaches there is a more immediate need to finish development of the Self Supply Business Practice. BPA will commit to having the Self Supply Business Practice out for customer comment as soon as practical after the start of the rate period. Please watch for this announcement in an upcoming Tech Forum email notification.