



Transmission Services

Balancing Service Election for Dispatchable Energy Resource Balancing Service (DERBS), and Variable Energy Resource Balancing Service (VERBS) Version 1

Response to Customer Comments

Posted: April 1, 2013

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Balancing Service Election for Dispatchable Energy Resource Balancing Service (DERBS), and Variable Energy Resource Balancing Service (VERBS) Version 1, Business Practice posted for review from March 11, 2013 through March 25, 2013.

Thank you for your comments.

Table of Contents

1. Southern California Edison (SCE).....	2
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1. Southern California Edison (SCE)

Southern California Edison (SCE) appreciates the opportunity to comment on the Balancing Service Election for DERBS and VERBS, Version 1, Business Practice. Comments are highlighted in gray.

- A. BPA is implementing staged customer elections by having customers elect their scheduling commitments on April 5, 2013 but allowing customers to elect their level of service on July 1, 2013. This election schedule provides sufficient scheduling information to set reserve levels for the FCRPS, and to identify a potential need to acquire Type 1 and Type 2 level reserves over the rate period. It also allows time to more fully define “Full Service” and “Enhanced Supplemental Service” (ESS) to help customers make an informed service level election. As of 2013, the Administrator has not yet made a final decision regarding the proposed ACS-14 rate schedule. To the extent the Administrator’s final decision regarding the proposed ACS-14 rate schedule conflicts with any term in this Business Practice, the final ACS-14 rate schedule will govern and, if so, this Business Practice will be updated accordingly.

Transmission Services’ Response

Yes, to the extent the Administrator’s final decision conflicts with any term in this Business Practice, BPA will update this Business Practice accordingly.

- B. The Service Election form to identify a Balancing Service Election is located at: http://transmission.bpa.gov/Customer_Form/acs/service_election_for.xls. (SCE comment: With respect to Self Supply, will the form include separate fields for each of the following: INC, DEC or both for generation imbalance reserve capacity; and INC, DEC or both for all components of VERBS.)

Transmission Services’ Response

No, a party that elects to Self-Supply must provide all components of their elected service (VERBS or DERBS) for both Incs and Decs. The exception to this is for parties that elect to participate in CSGI. The Elections form has an option to elect Self-Supply or CSGI.

C. A. Election Date

2.c. Self Supply generation imbalance reserve capacity or all components of VERBS for either of both INCS and DECS (if BPA allows us, or

Transmission Services’ Response

No, as clarified above, BPA requires that a party that electing to Self-Supply must provide all components of VERBS and DERBS, including both Incs and Decs. CSGI is available for parties that wish to supply the Generation Imbalance only component of VERBS.

- D. 3. Each VER Customer may elect to participate in Full Service by Close of Business on July 1, 2013. Elections to participate in Full Service are not binding for the entire rate period of FY2014-2015 but would be for a minimum of a three-month period with a 90 day notice to terminate participation. (SCE questions: Does a start date need to be specified on July 1? Does the start date need to be July1? Can a potential participate not elect on July 1 but

later elect to participate in Full Services? Are these questions addressed in other business practice(s)? A VER Customer that elects to participate in Full Service or Enhanced Supplemental Service at some time during the FY2014- 2015 rate period must meet the eligibility criteria set forth in the Full Service Business Practice or Enhanced Supplemental Service Business Practice.

Transmission Services' Response

The July 1 election date will be the first opportunity for parties who want to start participation in full service on Oct 1, 2013 to make their election known. During the FY2014- 2015 rate period, Parties may elect into or out of Full service. BPA will be working with customers through the ACS Forum to develop the business practices that will support implementation of Full Service and Enhanced Supplemental Service.

- E. 5. Except as provided in the Final ACS-14 rate schedule, a VER Customer that fails to make a Balancing Service Election pursuant to this Business Practice will be assumed to take VERBS and will be subject to Final ACS-14 VERBS rate schedule for uncommitted scheduling during the FY 2014-2015 rate period.

Transmission Services' Response

Yes, we will make this clarification in the BP.

- F. B. Eligibility Criteria for Self-Supply of VERBS and DERBS
1. A VER Customer that elects to Self-Supply INC and/or DEC components of balancing reserves for generation imbalance reserves for the FY2014-2015 rate period must meet the eligibility criteria set forth in the Self Supply of Balancing Reserves Business Practice or the Customer Supplied Generation Imbalance Business Practice.

Transmission Services' Response

No, a party that elects to Self-Supply must provide all components of VERBS and DERBS for both Incs and Decs. CSGI is available for parties that wish to supply the Generation Imbalance only component of VERBS.

- G. D. Submitting a Balancing Service Election

VER Customers:

2.d. For new VERS electing to Self-Supply generation imbalance reserve capacity or all components of VERBS for INCS and/or DECS, state the expected effective date Self-Supply will begin. Existing VERS must elect to Self-Supply balancing reserves by April 5, 2013 for the FY2014-2015 rate period.

Transmission Services' Response

No, a party that elects to Self-Supply, must provide all components of VERBS and DERBS for both Incs and Decs. CSGI is available for parties that wish to supply the Generation Imbalance only component of VERBS.