



Transmission Services

Long-Term Firm Queue: Evaluation of Requests and Offer of Service, Version 9

Response to Customer Comments

Posted: 10/27/2014

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Long-Term Firm Queue: Evaluation of Requests and Offer of Service, Version 9 Business Practice posted for review from September 24th, 2014 through October 8th, 2014

Thank you for your comments.

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Snohomish County PUD No. 1

Snohomish County PUD No. 1 (Snohomish) thanks BPA for the opportunity to comment on its Business Practice Long-Term Firm Queue: Evaluation of Requests and Offer of Service, Version 9. Snohomish generally supports the additional language contained in the redline document, and suggests clarification on the following points:

Snohomish requests additional explanation and language for Redirect Transmission Service Requests (TSRs) that are awaiting completion of required transmission upgrades before being granted service. Currently, there is only one section that specifically addresses Redirects (Section C.4(e)), and Snohomish believes this language has some ambiguity and raises further questions.

Transmission Service's Response

BPA appreciates Snohomish's participation and feedback in reviewing the proposed revisions to the Long-term Firm Queue Business Practice. BPA will modify the language included in the Business Practice to clarify the Follow-on provisions related to Redirect TSRs in response to Snohomish's response.

While it seems that Redirect TSRs are eligible to be issued Follow-on TSRs, the terms and requirements are unclear. If the Follow-on is issued, does the Transmission Customer have to take that capacity from the same Parent Reservation from which the Redirect has been made? Because the service type must match, is the Follow-on TSR a redirect from the same Parent as the Redirect currently in queue?

Transmission Service's Response

BPA will revise the BP to clarify this.

If the Initial Redirect TSR qualifies for Reservation Priority consistent with the terms of the Redirects Business Practice (i.e., the Redirect request terminates on the same Stop Date and Time of the Parent reservation), the customer would need to submit a renewal of the Parent reservation in order to submit a Follow-on Redirect TSR. The Follow-on Redirect TSR would be a Redirect request of the renewed Parent reservation. The Figures below provide an example. Assume a Transmission Customer has Parent Reservation X, with an Initial Redirect TSR Y off of and through the end of the term of Parent Reservation X (Figure A). Assume the Initial Redirect TSR Y is awaiting the completion of transmission upgrades and has not been awarded transmission service. If the Customer submitted a renewal of Parent Reservation X (Renewed Parent Reservation X1), then the Follow-on concept would permit the Customer to submit a Follow-on TSR for Initial Redirect TSR Y and continue awaiting transmission service under the Follow-on Redirect TSR (Y1) (Figure B). Follow-on Redirect TSR Y1 would be a Redirect of Renewed Parent Reservation X1 and, if granted, would take capacity from Renewed Reservation Parent X1. As reminder, the service duration of a Follow-on Redirect TSR must match that of the Renewed Parent reservation.

Figure A: Initial Redirect TSR Y of Confirmed Parent reservation X

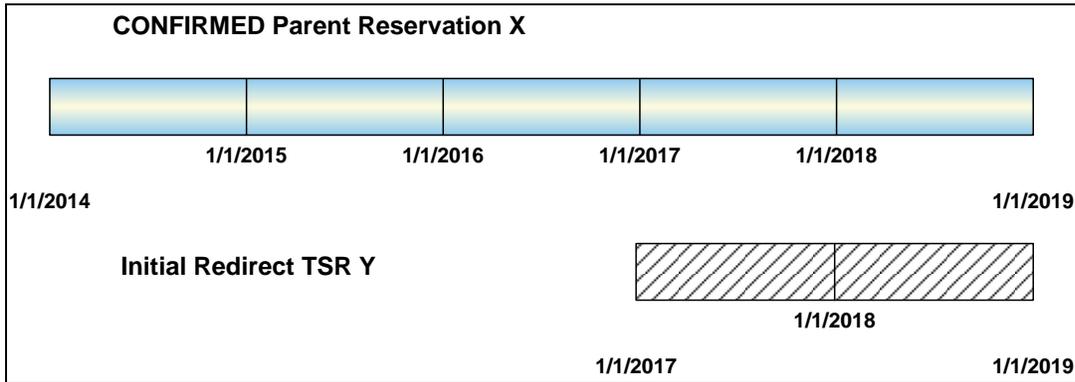
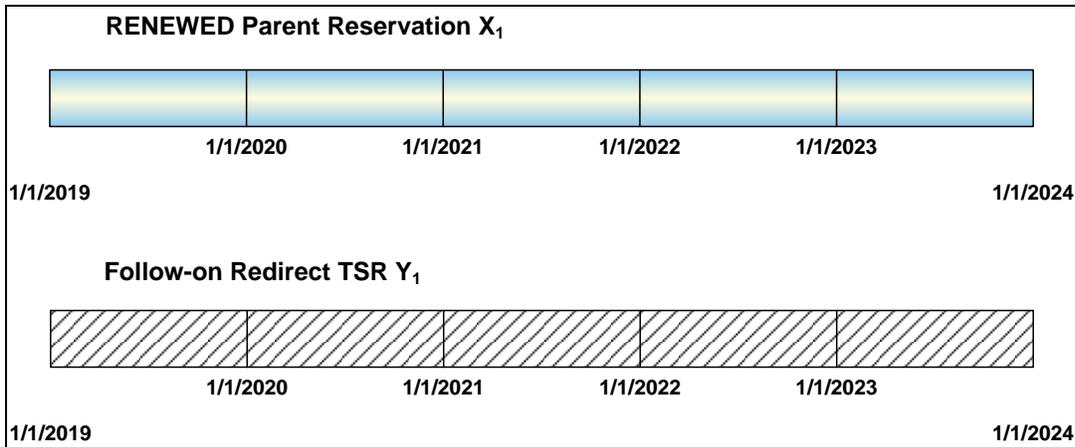


Figure B: Follow-on Redirect TSR Y₁ of Renewed Parent reservation X₁



Section C.4(e)ii indicates that the Service Duration of the Follow-on TSR of type REDIRECT must match that of the RENEWAL Parent reservation. This language also seems ambiguous; does the RENEWAL Parent refer to the Parent from which the in-queue TSR was redirected from? Or is the Redirect required to submit a Renewal request, the result being the "RENEWAL Parent" referenced in the Business Practice?

Transmission Service's Response

The renewal Parent Reservation refers to the renewed Parent reservation from which the in-queue TSR was redirected (See Figure B above). In order for a Follow-on Redirect TSR to be submitted, the Parent Reservation must first be renewed. If the Parent Reservation has not yet been renewed, there exists no confirmed reservation from which the Customer can submit a Follow-on Redirect TSR. See above Figures for additional clarification to the Follow-on Redirect TSR concept.

Snohomish requests additional language to clarify this point. Snohomish supports the concept of Follow-on TSRs and preserving queue priority for those TSRs awaiting the completion of other transmission projects. The process and requirements outlined in Section 4 of the Business Practice seem reasonable for implementation. Snohomish thanks BPA staff for their

efforts to further clarify the language surrounding Redirects and looks forward to the final Business Practice.

Transmission Service's Response

BPA appreciates Snohomish's response to and comments on the revised Long-term Firm Queue Business Practice, and will incorporate revisions to clarify the section on Follow-on Redirect TSRs.