



## Transmission Services

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### Partial LTF Service, Version 8

### Response to Customer Comments

Posted: **August 14, 2014**

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Partial LTF Service, Version 8 Business Practice posted for review from June 6<sup>th</sup>, 2014 through July 8<sup>th</sup>, 2014

Thank you for your comments.

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## Seattle City Light

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Thank you for soliciting customer comments on Version 8 of the Partial Long-Term Firm Service Business Practice. Seattle City Light (Seattle) appreciates the opportunity to comment and respectfully asks that BPA reconsider the proposed time a Customer has to submit a Remainder Transmission Service Request (TSR).

If a Partial Service offer is made to the Customer, Version 7 gives the Customer 15 days to submit the new Child TSR for the remaining capacity from the date the Parent TSR is changed to CONFIRMED status. Version 8 reduces the 15 days to submit a request for the Remainder to the same day the Customer changes the TSR's status to CONFIRMED. While Seattle isn't opposed to a reduction in the overall time period the Customer has to submit for the Remainder, the proposed reduction is too great and could result in lost transmission service.

Seattle suggests that instead of allowing 15 days to submit the Remainder, the time period be reduced to 5 days. Giving the Customer 5 days to submit the Remainder will allow for unforeseen circumstances, holidays, illness, etc. which could delay the Customer in being able to submit a Remainder request. Having more than a same day window is important when dealing with such a crucial business product like TSRs. Allowing the Customer a window of 5 days will give a needed cushion in the event of unforeseen circumstances and effectuate BP A's desire to reduce the current window.

### Transmission Service's Response

BPA revised the time period to 5 calendar days to submit Remainder requests.

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## PowerEx

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Powerex offers the following comments on Bonneville's Partial Long-Term Firm Service, Version 8 Business Practice.

While a two-business day limit for confirming a counteroffer isn't new to the revised practice, Powerex encourages Bonneville to use this update as an opportunity to align the timing requirements with those set out in NAESB Business Practice Standard WEQ-001 Table 4-2. The timing requirements for a customer to CONFIRM a COUNTEROFFER on OASIS for a Yearly PTP request has already been established at 15 calendar days.

### Transmission Service's Response

BPA makes every effort to align its OASIS timing requirements with those set forth in Table 4-2. BPA updated the final Business Practice to ensure that it aligns with those timing requirements.

Powerex encourages Bonneville to take a different approach to the OASIS processing of Yearly Service Offers, and suggests that when Bonneville offers an agreement for Firm Service to a customer, Bonneville ACCEPT or COUNTEROFFER the TSR on OASIS at the same time. This aligns the timing to execute the service agreement and confirm the request on OASIS to 15 calendar days. It allows the customer to CONFIRM the request on OASIS at any time during this window.

### Transmission Service's Response

BPA appreciates Powerex’s suggestion. BPA believes that until a Service Agreement has been executed, there is not a binding agreement between BPA and the customer. BPA follows the timing requirements set forth in Table 4-2. For LTF transmission service, that means allowing customers 15 calendar days to respond to a TSR once BPA places the TSR in an ACCEPTED or COUNTEROFFER state upon receipt an executed Service Agreement from the customer.

Bonneville has the ability to correct the status of TSRs on OASIS if they are CONFIRMED on OASIS but the customer does not execute the necessary Service Agreement.

Powerex believes this change is warranted, particularly as:

- 1) The existing process prevents the customer from being able to proactively confirm the TSR and must wait for Bonneville to change the status to COUNTEROFFER on OASIS; and
- 2) This places unnecessary risk on yearly service being DECLINED if key personnel are away when Bonneville sets the TSR to a COUNTEROFFER status.

### Transmission Service’s Response

BPA has the ability to reverse a TSR’s status change on OASIS. BPA feels that changing the TSR’s status before the receipt of an executed Service Agreement would be premature since there is not a binding agreement between BPA and the customer until receipt of the Service Agreement. BPA will follow the timing requirements set forth in Table 4-2 for LTF service in the following manner—BPA will allow customers 15 calendar days to respond once BPA places the TSR in an ACCEPTED or COUNTEROFFER state upon receipt of an executed Service Agreement from the customer.

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## Northwest Requirements Utilities

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Northwest Requirements Utilities (“NRU”) is a non-profit trade association of 54 public utilities that rely upon BPA as their primary or exclusive supplier of wholesale power and transmission services. NRU’s members are all BPA Network Integration Transmission (“NT”) Service customers. NRU appreciates the opportunity to comment on the Bonneville Power Administration’s (“BPA”) proposed Partial Long-Term Firm Business Practice, Version 8. We submit the following comments specifically regarding section B.1, Table A and B.

NRU appreciates BPA’s efforts to reduce the minimum number of consecutive months where an offer of Partial Service may be granted. That said, we disagree with the proposed restriction that ATC or Conditional Firm Inventory (CFI) must be available for at least 6 consecutive months for an offer of Partial Service to be granted. We believe this requirement does not comport with the intent of the proposed changes to the Business Practice. In fact, this condition may be more restrictive for a Partial Offer that meets the Section 5 requirements in the existing Business Practice.

### Transmission Service’s Response

Section 5 of BPA’s Partial Long-Term Firm Service, Version 7, Business Practice restricts a Partial Service offer to 12 consecutive months unless the offer falls within the last 12 months of the TSR’s requested term, is at least one month in duration, and extends to the end of the TSR’s requested term. Version 8 proposes reducing the required consecutive months to 6 consecutive months unless the offer is for service occurring in the last 6

months of the TSR's term, is at least one month in duration, and extends to the end of the TSR's requested term.

Rather, BPA should offer Partial Service to Long-Term Firm NT requests for any and all months where ATC or CFI is available, with no limit on number of months and no requirement for consecutive months as a condition of a counteroffer for partial service.

### Transmission Service's Response

BPA appreciates NRU's suggestion. Prior to adopting NRU's suggestion, BPA would like to determine the impacts of the reduction proposed in Version 8.

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## PNGC

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PNGC would like to submit the following comments regarding Version 8 of BPA's Partial Long Term Firm business practice:

Our comment refers to Table A and Table B under section B.1.

In both tables the "Partial Term/Partial MW without ROFR" offer type states that the partial offer must be available for at least 6 consecutive months of the TSR's term.

PNGC would like to see BPA offer partial service for any available months, with no limit on number of months and no requirement for consecutive months as a condition of a counteroffer for partial service. As NT customers, our requests are only to serve load; our load is firm in ALL months. Having firm transmission for ANY month is better than having to use short term firm products, or ultimately, nonfirm transmission. BPA's business practices for NT should do all that they can to offer any firm service that is available when making a partial long term firm transmission counteroffer. There is no reason that a partial service offer in response to an attested-to NT TSR should be countered with any less than all months that are available, even if the months are not consecutive and even if it is only for one month. We strongly urge you to consider amending your partial offer business practice, at least as it applies to NT TSRs, with a removal of the 6 consecutive month limitation on counteroffers.

### Transmission Service's Response

BPA appreciates PNGC's suggestion. Prior to adopting PNTC's suggestion, BPA would like to determine the impacts of the reduction proposed in Version 8.