



Transmission Services

Requesting Transmission Service, V24

Response to Customer Comments

Posted: March 13, 2015

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Requesting Transmission Service, V24 Business Practice posted for review from February 13, 2015 through March 01, 2015.

Thank you for your comments.

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1. Snohomish County PUD

When customers needing something other than a flat reservation request transmission service, the ability to create a shaped request is superior to a flat request, as the customer is not encumbering transmission capacity that they do not need. This benefits both the customer and BPA as it efficiently allocates capacity to those who need it on the transmission system. PTP customers should be able to take advantage of this efficiency as well as NT customers. The ability to submit singular reservations, rather than the current of “layering” reservations on top of each other both meets the business need of PTP and customers and simplifies the reservation dynamic for both the customer and BPA. PTP customers already are able to shape their reservations in the Hourly Firm increment which provides great value; BPA should extend that value to the other service increments.

Transmission Service’s Response

BPA is open to exploring whether to permit the shaping of short-term PTP requests outside of the Hourly service increment, which is currently sold unlimited.

BPA will consider internally the competing project priorities, and identify when and how to explore the concept of shaping of Short-Term Firm PTP Service and the associated customer engagement.

If NT is granted the ability to submit shaped STF schedules, a possible inequity arises regarding the timing of requests; NT customers would be able to secure needed capacity prior to a PTP customer, unless that PTP customer pays a premium through the purchase of unneeded capacity.

Transmission Service’s Response

Permitting the shaping of Transmission Service Requests (TSR) to designate Network Resources (DNR) is an inherent attribute of NT Service.

NT Service may only be used by an NT Customer to serve its own load, and may not be used to make deliveries to third parties. Since load variability is the nature of load service, NT Customers need the ability to designate Network Resources in the shape of the load commensurate with the shape of generation they are acquiring to serve that load.

As BPA evaluates whether to permit shaping of Short-Term PTP TSRs, it will consider the benefit identified to PTP Service identified by Snohomish.

It is generally accepted that if PTP requests could be tailored to cause unfair competitions or preempt reservations in a predatory manner. However, under the current BPA standards, and proposed Preemption and Competition standards under consideration at the North American Energy Standards Board (NAESB), any shaped PTP request would not be considered a challenger. This completely prevents shaped PTP requests from gaming Preemption and Competition as they will not participate in the process as a challenger.

Essentially, if PTP customers are allowed to submit shaped requests, they would be presented with a choice regarding Competition: either submit a flat request and be considered an eligible challenger, or submit a shaped request and forego the possibility of competition.

Transmission Service's Response

As Snohomish points out, if Short-Term Firm PTP requests are permitted to have a shaped MW demand, those requests could not be considered as eligible Challengers. Thus, PTP Customers would be faced with the choice of submitting a flat request and being considered an eligible challenger or submitting a shaped request and foregoing the ability of participating in the competition process.

As BPA evaluates the merits of permitting the shaping of Short-Term PTP requests, BPA will take the above factor into account. Through the evaluation process, BPA will consider whether there are any other gaming or competition/preemption considerations to address.