

Requesting Transmission Service, Version 25

Response to Customer Comments

Posted: May 15, 2015

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Requesting Transmission Service, Version 25, posted for review from April 10, 2015 through April 29, 2015.

Thank you for your comments.

Table of Contents

A.	Portland General Electric	1
2.	BPA Power Services	2

A. Portland General Electric

- B. PGE appreciates the work BPA has done to implement Service Across Multiple Transmission Systems (SAMTS) for long-term firm yearly point-to-point and network transmission customers. However, PGE would like to urge BPA to continue its work to extend the eligibility for coordinated requests to the following types of service, as specified in NAESB WEQ-001-23.2.2:
- a. Monthly firm PTP
 - b. Monthly non-firm PTP
 - c. Firm network service with a minimum duration of one month
 - d. Secondary Network Transmission Service with a minimum duration of one month

Transmission Service's Response

[BPAT will continue to explore software development and implementation options that allow the monthly firm PTP, monthly non-firm PTP, firm monthly NT, and secondary monthly Network Service.](#)

- C. PGE would like to request clarification on Section D.1.a, specifically regarding why requests associated with an active 2008, 2009, or 2010 Precedent Transmission Service Agreement are ineligible to be coordinated requests. Does BPA have a timeline for when it plans to make these requests eligible to be coordinated requests?

Transmission Service's Response

Requests associated with a PTSA cannot be used as part of a coordinated group because of incompatibility with SAMTS requirements. The PTSA is a contract requiring the customer to take service upon completion of the identified upgrade or the requested service commencement date (whichever is later). The Customer must show continuity over time and path when the coordinated request is submitted. Timelines associated with PTSA builds are only estimates and therefore do not offer the certainty required in a SAMTS request.

BPA will consider allowing SAMTS requests as part of BPA's future TSR study and expansion processes.

2. BPA Power Services

- A. BPAT may have addressed this during the Apr. 23 customer forum. BPA's implementation plan for SAMTS describes allowing only Yearly service requests to be included as a Coordinated Request, because BPAT's implementation of a "Monthly" service uses "Daily" increments, and the existing OATI timing automation for SAMTS currently is unable to properly consider BPAT's Monthly increment. How will Coordinated Requests with other TPs with "monthly" requests and reservations be impacted?

Transmission Services' Response

BPAT will continue to explore software development and implementation options that allow the monthly firm PTP, monthly non-firm PTP, firm monthly NT and secondary monthly Network Service.

- B. Does this BPAT (or OATI/OASIS) limitation prevent the Coordinated Requests or Reservations on other transmission systems from using this functionality with BPAT? This limitation would impact a customer's ability to attest Contiguity.

Transmission Services' Response

Coordinated requests from other TPs that include a monthly request will not be impacted by BPAT not offering a monthly product. A coordinated request may include existing reservations to attest contiguity.

- C. What does BPAT and other TPs plan to do with monthly requests/reservation until this limitation is resolved?

Transmission Services' Response

BPAT will continue to explore software development and implementation options that allow the monthly firm PTP, monthly non-firm PTP, firm monthly NT, and secondary monthly Network Service into its SAMTS process. A coordinated request may include existing reservations to attest contiguity. Implementation of SAMTS is the responsibility of individual TPs.

- D. In section D.2.b.i., it states that the customer must “complete the information requested” for all coordinated requests and existing confirmed reservations in the group. Please list the information that would be requested that is in addition to those requested by the transmission provider for an original request.

Transmission Services’ Response

After the TSR is submitted with Coordinated Group (CG) Status set to PROPOSED, the following information must be provided for all TSRs and existing reservations in the Coordinated Group:

- Transmission Provider
- Coordinated Request Disposition
- Coordinated Request Assign Ref
- Coordinated Request TS Class
- Coordinated Request TS Type
- Coordinated Request Disposition Time (for confirmed requests only)

- E. Section D.2.b. ii, states that by the customer changing the status to ATTESTED, the customer attests that the coordinated group will provide contiguous service over time and affected systems. How will BPA’s implementation address a coordinated group of coordinated requests and/or existing reservations that are of Monthly duration, since those are allowed under FERC order 676-H?

Transmission Services’ Response

BPAT will not evaluate the contiguity of the request. BPAT will evaluate the coordinated request for ATC and ensure the request meets the product requirements for requested service.

- F. In section D.3.a., it states that BPA will not act positively to a coordinated request until the customer meets the attestation requirement. What is the attestation requirement? Is it simply changing the status to ATTESTED, or is it BPA verifying that the coordinated group does indeed appear to provide contiguous service over time and affected systems?

Transmission Services’ Response

BPA will not respond to a coordinated request until the coordinated group has been placed into ATTESTED status. Attestation status is achieved when the customer verifies that the coordinated request is contiguous over time and path by changing the status to ATTESTED on OASIS.

BPA does not verify that a coordinated request is contiguous over time and path. It is the responsibility of the customer to attest that the coordinated group meets the continuity requirements. BPAT will not take action on the coordinated request until the customer attests to contiguity.

- G. Finally, it would be helpful to include in the business practice an example form to be used to create coordinated requests.

Transmission Services' Response

Given that the submittal of coordinated requests is an automated function available on OASIS, BPAT will not provide an example form used to create coordinated requests. However, the Requesting Transmission Service business practice will include an appendix detailing the submittal of coordinated requests.

- H. It would also be helpful to have the step-by-step instructions to associate those requests and existing reservations (if any) across multiple transmission service providers to form a coordinated group.

Transmission Services' Response

The Requesting Transmission Service business practice will include an appendix detailing the process for associating a coordinated request with an existing reservation.

- I. It would also be helpful to know whether a customer must do this for each transmission service provider system, and any advice on how to create this efficiently within OATI.

Transmission Services' Response

The customer is required to provide the required information on OASIS for **each** of the other Coordinated Requests in the Coordinated Group.