



Conditional Firm Transmission Service (CFS), Version 17

Effective: 09/18/14

Conditional Firm Transmission Service is a type of Long-Term Firm transmission service for which there is a specified **Number of Hours**¹ per year or specified System Condition in which the Transmission Provider can curtail the reservation prior to curtailing other Long-Term Firm service.

Version 17 includes the following changes:

- Section B. 10: Clarifies that **CFS**² may not be used for any transaction that requires a suffix.
- Section C. 2: Removes the “no earlier than 13 calendar days from the **Date of Tender**³...” language in Section C to allow Transmission Services to change the **TSR**⁴'s status upon the return of a signed CF Service Agreement.
- Section J.1.d: Clarifies that the term of the remainder request must match the term of the **Reassessment**⁵ CFS.
- Section J.1.f: Clarifies the actions taken against a Reassessment TSR if BPA can offer Long-Term Firm service on all or part of the new request a **Customer**⁶ submits to transition from Reassessment to **Bridge**⁷ CFS.

¹Conditional Firm Service in which Transmission Services' Conditional Curtailment rights during each calendar year are based on the Number of Hours specified in the Service Agreement Table. Transmission Services can exercise these Conditional Curtailment rights any time such network curtailment would help to relieve actual or anticipated reliability problems on the Network Transmission System.

²Conditional Firm Transmission Service

³The day that the Customer receives an offer for transmission service from Transmission Services. If that day is a Saturday, Sunday or Federal Holiday, the Date of Tender is the next Business Day.

⁴Transmission Service Request

⁵A type of Conditional Firm Service in which Transmission Services has the right, no more often than once every two years, to unilaterally modify the Number of Hours specified in the Table for the reservation or terminate Conditional Firm Service altogether for purposes of maintaining reliability.

⁶Any customer taking service under Use of Facilities (UFT), Formula Power Transmission (FPT), Integration of Resources (IR), Part II or Part III of the OATT.

⁷A type of Conditional Firm Service that Transmission Services offers and the Customer accepts until Long-Term Firm becomes available. Bridge service provides Customers with a fixed annual Number of Hours or System Conditions subject to Conditional Curtailments that the Transmission Provider cannot unilaterally change as long as the service remains Bridge service.

A. Background

1. The Federal Energy Regulatory Commission (FERC or Commission) adopted a requirement for Transmission Service Providers to offer CFS (See Order No. 890 and Order 890-A). To review the Commission's discussion and determinations regarding CFS in Order No. 890, see paragraphs 962 to 1094. To review the Commission's discussion and determinations regarding CFS in Order 890-A, see paragraphs 545 to 594.

B. Characteristics of CFS

1. Under the OATT, CFS¹ is treated in the same manner as other Long-Term Firm (LTF PTP) or Network (NT) service except as otherwise specified in the Service Agreement (SA) and this Business Practice.
2. CFS is not a reservable product on OASIS².
3. CFS eligibility requirements that must be met prior to BPA Transmission Services making an offer of full or Partial CFS are:
 - a. The Customer requested either a LTF PTP or NT service and BPA Transmission Services could not offer LTF Service³.
 - b. BPA Transmission Services has not made a previous Partial CF offer to the TSR which was not CONFIRMED.
 - c. BPA Transmission Services will assess each eligible TSR with a Subgrid⁴ issue to determine if a CFS offer can still be made.
 - i. In the event that a Subgrid issue excludes the TSR from receiving service, Conditional Firm Inventory⁵ will not be encumbered for that TSR.
 - ii. If a Subgrid issue that excludes the TSR from receiving service is later resolved, the TSR will be reassessed to determine whether CFS can be offered at that time.
 - d. BPA Transmission Services may use its existing LTF ATC⁶ or CF Inventory to make a CFS offer consistent with the processes described in this Business Practice.

¹Conditional Firm Transmission Service

²Open Access Same-Time Information System

³Either Long-Term Firm (LTF) or Point-to-Point (PTP) Transmission Service or LTF Network Intergration (NT) Transmisison Service.

⁴Any facilities on the interconnected transmission system that do not, by themselves, make up one of the monitored Flowgates e.g., lines, transformers, or substations.

⁵The number of megawatts (MW) available for providing CF Transmission Service at each Flowgate.

⁶Available Transfer Capability

- e. The Point Of Receipt (POR¹) and Point Of Delivery (POD²) for the TSR is at a sufficient level to allow BPA Transmission Services to accurately calculate Power Transfer Distribution Factor³ (PTDF⁴) impacts to support CFS or the Customer is willing to submit a new linked TSR that meets the POR and POD PTDF accuracy requirements for CFS.
 - f. The CFS reservation will not be used to support transmission of a transaction for which BPA Transmission Services cannot do an accurate PTDF analysis.
 - g. The period between the original TSR's Service Commencement Date (SCD) and the date on which the analysis is being performed is no more than three years.
4. BPA Transmission Services has assessed its ability to reliably provide CFS and has posted Conditional Firm Inventory for each network Flowgate⁵ (see Conditional Firm Inventory Methodology document). PTDF analysis is used to determine the amount of CF Inventory necessary to offer CFS in the same manner as is done for LTF offers (see Related Business Practices below).
5. BPA will ask the Customer if it wants to receive an offer of CFS and, if it does, whether it wants an offer of : 1) the Number of Hours option, 2) the System Conditions⁶ option, or

¹Point of Receipt is an interconnection on the Transmission Provider's Transmission System where capacity and energy will be made available by the Delivering Party; An OASIS field on a TSR that is the scheduling POR.

²Point of Delivery is a point on the The Transmission Provider's Transmission System where capacity and energy transmitted by the Provider will be made available to the Receiving Part; An OASIS field on a TSR that is the scheduling POD.

³Power Transfer Distribution Factor (PTDF) Calculation: An equation based on a POD, POR and Transmission Demand used to determine the impacts to Network Flowgates. $(POR\ PTDFa - POD\ PTDFa) * Transmission\ Demand = impact\ to\ Flowgates$

⁴Power Transfer Distribution Factor (PTDF) Calculation: An equation based on a POD, POR and Transmission Demand used to determine the impacts to Network Flowgates. $(POR\ PTDFa - POD\ PTDFa) * Transmission\ Demand = impact\ to\ Flowgates$

⁵Flowgate (Cutplane): Transmission lines and facilities owned by BPA on a constrained portion of BPA's internal network transmission grid or transmission lines and facilities owned by BPA and one or more neighboring transmission providers that are interconnected and the separately owned facilities are operated in parallel in a coordinated manner, and each of the owners has an agreed upon allocated share of the transfer capability.

⁶A specified condition on the Transmission Provider's system or on a neighboring system, such as a constrained transmission element or flowgate, that may trigger Curtailment of Long-Term Firm Point-to-Point Transmission Service using the curtailment priority pursuant to Section 13.6 of the OATT. Such conditions must be identified in the Transmission Customer's Service Agreement.

- 3) offer of both options. If the Customer wants to receive an offer for both the System Conditions option and the Number of Hours option for further consideration, it will only be able to CONFIRM one of the offers. If the Customer does not respond to the notification within 21 days of the date of the notification, BPA will make only a Number of Hours offer.
6. The Customer must pay for any necessary studies to determine: 1) whether BPA can offer **Conditional Firm Service**¹, 2) the Number of Hours or System Conditions associated with such service, and 3) any Reassessment studies.
 7. When BPA Transmission Services makes a CFS offer, it will either be for **Bridge Service**² or **Reassessment Service**³.
 8. A resource enabled through CFS qualifies as firm service that supports the designation of Network Resources.
 9. Customers with CFS pay the LTF PTP or NT rate regardless of any Conditional Curtailments.
 10. CFS may not be used for any transaction that requires a suffix. In the case of CFS TSRs that need to be conformed from **Newpoint**⁴ to a valid scheduling point, BPAT will create the long-term CFS TSR with the valid scheduling point on the Customer's behalf and notify the Customer of this action and new TSR number.

C. CFS Offer

1. TSRs will be considered for CFS offers in queue order if BPA Transmission Services cannot make LTF offers.
2. If BPA Transmission Services has determined it is able to make an offer of CFS on a TSR:

¹A type of Long-Term Firm Transmission Service that is subject to Conditional Curtailment for the Number of Hours. CFS is firm service with less-than-firm scheduling rights due to NERC priority 6 Conditional Curtailment rights for the Number of Hours in a year specified in the Service Agreement Table for CFS reservation.

²A type of Conditional Firm Service that Transmission Services offers and the Customer accepts until Long-Term Firm becomes available. Bridge service provides Customers with a fixed annual Number of Hours or System Conditions subject to Conditional Curtailments.

³A type of Conditional Firm Service in which Transmission Services has the right, no more often than once every two years, to 1) unilaterally modify the Number of Hours or System Conditions specified in the Table for the reservation, or 2) terminate Conditional Firm Service altogether for purposes of maintaining reliability.

⁴A Point of Receipt (POR) or Point-to-Point (POD) for BPA's network or external interties within the Northwest that is not currently modeled on OASIS.

- a. BPA Transmission Services will offer the Customer a Service Agreement (SA) Table without an **Assignment Reference (AREF)**¹ number for signature.
 - b. If the Customer returns the Service Agreement in the specified time frame, BPA Transmission Services will build a new CFS TSR and set the status of the TSR to ACCEPTED.
 - i. The Customer will have 15 calendar days after the date that BPA Transmission Services changes the TSR's status to ACCEPTED to change the TSR's status to CONFIRMED.
 - ii. If the Customer fails to change the TSR's status to CONFIRMED within the specified time frame, BPA Transmission Services will change the status of the TSR to RETRACTED and the TSR will receive no further consideration.
 - c. BPA Transmission Services will set the status of the Parent TSR appropriately.
 - d. BPA Transmission Services will insert the **AREF**² number into the SA Table and return it to the Customer. The Customer must initial the AREF number and return the Table to BPA Transmission Services within five Business Days.
 - e. The cover letter will provide instructions regarding any additional steps necessary for the CFS.
 - f. If the Customer chooses the System Conditions offer, the Service Commencement Date shall be the first of the month after the process used to curtail transmission has been modified to incorporate the System Condition associated with the offer.
3. For each CF TSR CONFIRMED by the Customer, BPA Transmission Services will decrement LTF ATC and CF Inventory needed in the following manner:
- a. For all Flowgates for which LTF ATC and/or De Minimis Impact Dead-Band is available, LTF ATC will be decremented.
 - b. For all Flowgates for which LTF ATC and/or De Minimis Impact Dead-Band is not

¹A unique reference number automatically assigned by the OASIS to provide a unique record for each transmission or ancillary service request.

²A unique reference number automatically assigned by OASIS to provide a unique record for each transmission or ancillary service request.

available, CFS Inventory will be decremented.

4. If the Customer either fails to execute and return the Exhibit and Table or the Table (as appropriate) within the specified timeline or fails to change the status of the CFS TSR to CONFIRMED within the deadline, the Parent TSR will receive no further consideration for CFS. The CF Inventory is released and BPA Transmission Services will evaluate and proceed with the next offer that can be made using that CF Inventory.

D. POR & POD Modification

1. If BPA Transmission Services determines that the POR or POD in the Transmission Service Request is insufficient for adequate **Conditional Curtailment**¹ due to inability to accurately calculate PTFDF impacts, BPA Transmission Services will provide the Customer with written notice.
2. BPA Transmission Services will work with the Customer to develop a mutually agreeable POR or POD for CFS.
 - a. If the Customer wants to receive an offer of CFS, the Customer will need to submit a new TSR using the mutually agreeable POR or POD. The TSR must specify the AREF number of the original request in the Deal Ref field.
 - b. If BPA Transmission Services and the Customer are unable to reach agreement on a new POR or POD, or if the Customer fails to submit the new TSR within 30 calendar days of written notice, BPA Transmission Services will deem the TSR ineligible for CFS. The TSR will receive no further consideration for CFS.

E. E-Tagging Requirements for CFS

1. When e-Tagging LTF-CF6 Yearly PTP or NT, the e-Tag must contain:
 - a. The AREF number
 - b. A suffix of “-CF”
 - c. A NERC priority code of 6-NN

¹Curtailments that occur at the North American Electric Reliability Corporation (NERC) priority 6 for either: 1) the System Conditions specified in the Service Agreement Table, or 2: for no more than the Number of Hours each calendar year specified in the Service Agreement Table.

2. When e-Tagging a LTF-CF7 PTP or NT, as a result of receiving Short-term (see Section F below), the e-Tag must contain:
 - a. Either the AREF number or the contract number
 - b. No use of suffix
 - c. A NERC priority code of 7-F when tagging LTF-CF7 for PTP
 - d. A NERC priority code of 7-FN when tagging LTF-CF7 for NT Service.

3. When e-Tagging a LTF-CF6 PTP or NT as a result of receiving a System Conditions Conditional Firm reservation, the e-Tag must contain:
 - a. The AREF number
 - b. A NERC priority code of 7-F for LTF-CF6 PTP
 - c. A NERC priority code of LTF-7-FN when tagging for LTF-CF6 NT

F. Priority Rights to Short-Term Firm (STF)

1. CFS reservations have priority rights to STF ATC. If the Transmission Customer has a CFS reservation which has Subgrid issues, that reservation will not be eligible for STF ATC.
2. BPA Transmission Services will assess the availability of STF ATC on a monthly basis for service in future months.
3. All of the Flowgates that used CF Inventory must have STF ATC available for the month for the reservation to be Firmed Up. If that is not the case, the STF ATC will be assessed for use by the next CFS reservation in queue order. If there is insufficient STF ATC to **Firm Up**¹ all of a CFS reservation, a portion of that reservation will be Firmed Up.
4. If there is not enough STF ATC at one or more Flowgates to allow all of the CFS reservations to be Firmed Up for the month, STF ATC will be allocated in queue order.

¹The transition from an OASIS product of LTF-CF6 Yearly Point-To-Point (PTP) or Network (NT) reservation which is e-Tagged as a 6-NN NERC priority code to an OASIS product of LTF-CF7 PTP or NT reservation which is e-Tagged as a 7-F or 7-FN NERC priority code. This can be done either for a month based on availability of Short-Term Firm ATC, for a reservation with a Number of Hours Conditional Firm Product for the remainder of the year if all of the Conditional Curtailment hours for the reservation are used up. Note that this process creates a new reservation.

5. If STF ATC is available to Firm Up a LTF CF-6 PTP or NT reservation for the month, BPA Transmission Services will create a new CF reservation with a firm NERC Curtailment priority and will recall the capacity from the CFS reservation with a NERC Curtailment priority of 6-NN for that month. BPA Transmission Services will set the status of the new reservation to CONFIRMED.
6. If a CFS reservation will not receive STF for a month, there will be no change of CFS reservation.
7. For a CFS TSR to be eligible to be Firmed Up with STF ATC, no e-Tags can be in place for the month being Firmed Up. If the LTF CF-6 PTP or NT reservation has any reductions (such as those due to e-Tags, Redirects, Recalls, or Resales) against it, it will not be Firmed Up.
8. BPA Transmission Services will not Firm Up CFS reservations based on weekly, daily, or hourly capacity or changes to monthly capacity after the Firm Up process.
9. BPA Transmission Services will not displace a STF reservation to enable a CFS reservation to be Firmed Up.
10. BPA Transmission Services will not compete the Firmed Up portions of CFS in the STF market.
11. For reservations undergoing a Reassessment, STF capacity will be encumbered, but the reservation will not be Firmed Up until the Customer signs the new Reassessment Table. If the Customer does not sign the new Reassessment Table, the STF will be released to the market.
12. For reservations with a Service Commencement Date (SCD) more than 60 calendar days in the future, BPA Transmission Services will encumber STF capacity to Firm Up the CF reservation on a fourth month out basis (if available). BPA Transmission Services will only create the Firm Up TSR once the SCD is less than 60 calendar days in the future and if the Customer does not obtain an Extension for Commencement of Service under Section 17.7 of the OATT and the Deferral Service Business Practice. If the Customer obtains an Extension for Commencement of Service, BPA Transmission Services will release the STF Capacity to the market at the time that the Deferral CF TSR is CONFIRMED.

G. CFS Curtailment

1. General Characteristics of CFS Curtailments:
 - a. Conditional Curtailments of CFS are conducted based on the NERC priority levels specified in the e-Tag.
 - b. Under CFS, Conditional Curtailment may occur any time a network reliability event is occurring, or is anticipated to occur that a CFS Curtailment can help to relieve. Such Curtailments will be done in NERC Curtailment priority order.

- c. When Conditional Curtailment occurs, the Customer must reduce the generator or the load associated with Conditional Firm by the amount of the Conditional Curtailment for the period of the Conditional Curtailment.
 - i. If the source of the CFS TSR is in another Balancing Authority Area (BAA) and that BAA only has one point of interconnection with Bonneville's BAA, then any generator can be reduced in that BAA to satisfy the section 1.c. requirement above since they all have the same PTDF impact.

2. Additional Curtailment characteristics of CFS that has not been Firmed Up:

- a. Specific to Interties and External Interconnection Curtailments
 - i. Curtailments to CFS that occur as a result of Intertie or External Interconnection Curtailments do not constitute use of Conditional Curtailment Rights.
 - ii. CFS will be treated as NERC Priority 7 if Curtailment of an intertie or external interconnection is required for a future hour.
 - iii. CFS will be treated as NERC Priority 6 if Curtailment of an intertie or external interconnection is required in hour.
- b. Specific to Network Curtailments, except Puget Sound Area Northern Intertie (PSANI) Curtailment. For any individual hour, one hour of use of Conditional Curtailment rights will be counted for a specific CFS reservation if all of the following criteria are met:
 - i. The CFS reservation was used on an e-Tag where all or part of that hour was curtailed,
 - ii. The Curtailment occurred on one or more network portions of the curtailed e-Tag, and
 - iii. If the e-Tag used one network segment using Non-Firm service and another segment using CFS, another e-Tag using only Priority 6 and/or 7 services was also curtailed in that hour for one or more of the same network Flowgates requiring relief.
- c. Curtailments of an e-Tag with two CFS network segments performed as above constitutes one hour of Conditional Curtailment use for each CFS reservation.
- d. Curtailments of wind generation as a result of Dispatcher's Standing Order 216 do not count towards the Number of Hours.

- e. Specific to PSANI Curtailments, for any individual hour, one hour of use of Conditional Curtailment rights will be counted for a specific CFS reservation if all of the following criteria are met:
 - i. The CFS reservation was used on an e-Tag where all or part of an hour was curtailed, and
 - ii. The network segment using CFS caused the e-Tag to be included in the PSANI Curtailment calculation in effect for that hour.
3. Additional Characteristics of CFS that has been Firmed Up:
- a. When a CFS had been Firmed Up the e-Tag must have a firm NERC priority code and is curtailed or redispatched for on the same basis as all other firm transmission.
 - b. Curtailments to Firmed Up CFS do not constitute any hours of use of Conditional Curtailment rights.
4. The following apply to Curtailment of CFS that has not been Firmed Up:
- a. The e-Tag must have a NERC priority code of 6-NN and in-hour network Curtailments occur the same basis as all other 6-NN transmission.
 - b. When a Conditional Curtailment occurs, no alternate e-Tags are allowed for the portion of the generator(s) that were curtailed.
 - c. For Number of Hours CFS, BPA Transmission Services will track the number of CFS hours curtailed for the year under each CFS reservation and provide documentation to the Customer upon request.
 - d. For Number of Hours CFS, when network Curtailments are made at the NERC priority level 6, valid Conditional Curtailments which are properly implemented are counted against the number of Conditional Curtailment hours (including if Transmission Service made such Curtailment in error but failed to reload the e-Tags).
 - e. For Number of Hours CFS, when the number of Conditional Curtailment hours used in the calendar year meets or exceeds the number of specified hours in the CFS Table, the CFS will be Firmed Up for the remainder of the calendar year on the next **Business Day**¹ for the period starting the following Business Day. **Note:** The Customer will need to withdraw or adjust any e-Tags that are using the referenced capacity for that period to allow the Firm Up process to take place.
 - f. For Number of Hours CFS, if the priority of service for the CFS becomes firm due to using all the Conditional Curtailment hours defined for the reservation, BPA Transmission Services will create a new firm reservation for the remainder of the calendar year.

¹Any weekday (Monday through Friday) that is not a United States Federal Holiday.

5. Additional CFS Hours Counting Rules

- a. For any individual hour, only one hour of use of Conditional Curtailment rights will be counted for a specific CFS reservation, regardless of the number of Curtailments performed within that hour or number of e-Tags curtailed as described above.
- b. In the event that one or more network segments in the e-Tag are vertically stacked, BPA Transmission Services will determine whether or not an hour of Curtailment constitutes one hour of use of Conditional Curtailment rights depending on the extent of the Curtailment and how the e-Tag was stacked.
- c. When BPA Transmission Services Dispatchers request a generator associated with a CFS reservation to decrement due to local area reliability problems, that decrement will not count towards the Number of Hours.

H. Testing of Curtailment Capability

1. There are two kinds of Curtailment tests - scripted and unscripted:
 - a. Scripted test - BPA Transmission Services will work with the reservation holder to determine the day and hour of the test and provide advance notice of the amount of the Curtailment. Scripted tests will be done upon request by the Customer and mutual agreement with BPA Transmission Services to assist the Customer in preparation for the unscripted Curtailment test. Only two one-hour scripted tests each year will count towards the Number of Hours.
 - b. Unscripted test - an unannounced test Curtailment.
 - c. BPA Transmission Services will provide the results of each unscripted and scripted test in writing to the Customer within five Business Days after the unscripted test.
2. Shortly after commencement of a CFS reservation, BPA Transmission Services and the Customer will mutually agree to a fourteen calendar day period where an unscripted test will occur. If BPA Transmission Services and the Customer cannot mutually agree to a fourteen calendar day period where an unscripted test will occur, then BPA Transmission Services will select the fourteen calendar day period where an unscripted test will occur after taking into account Customer's needs.
 - a. If, upon occurrence of the unscripted test, generation reduction occurs as ordered, no further testing of Curtailment capability will occur due to the new CFS reservation. BPA Transmission Services may only perform additional unscripted tests as described in step 3 below.
 - b. Each unscripted test Curtailment counts as the use of one hour towards the Number of Hours.
 - c. An unscripted test will count as one of the test hours specified in the contract.

3. BPA Transmission services may also do unscripted tests in response to:
 - a. Failure to fully comply with an e-Tag Curtailment (including a test Curtailment)
 - b. Any indication that the reservation holder is or will have difficulty complying with a Curtailment directive for the CFS transmission
4. Test Curtailments, whether scripted or unscripted, will be:
 - a. Limited to a reasonable amount of MWs necessary to determine that the generator complied with the Curtailment order
 - b. Implemented late in the hour or will be reloaded to minimize the amount of energy Curtailed

I. Bridge CFS

1. If required, the Customer must commit to participate in the necessary system upgrade(s) for the Flowgate(s) that will enable LTF service.
2. **Bridge**¹ CFS will convert to LTF Service if the facilities identified in the Service Agreement or their equivalent are completed or if LTF Service otherwise becomes available.
3. Conversion to Long-Term Firm Transmission Service does not change the Service Termination Date. The new LTF reservation will have the same Service Termination Date as the CFS reservation that it replaces.
4. If the Customer has Bridge CFS and BPA Transmission Services notifies the Customer that the necessary system upgrade(s) will not proceed at the Embedded Cost Rate, the Customer has the following options:
 - a. Accept service at the Incremental Cost Rate and make the associated commitments required. If the Customer accepts service at the Incremental Cost Rate, but does not meet a required commitment, Bridge CFS will terminate. The Customer will be eligible to obtain Reassessment Service as described in the CFS contract.
 - b. Execute an offer of Reassessment Service. BPA Transmission Services will make this offer based on the CF Inventory, if any is needed, and the Number of Hours or System Conditions associated with it at the time of the offer.

J. Reassessment CFS

1. Reassessment only applies to a CFS reservation which is not based on Bridge CFS. For Reassessment CFS, the reservation is to transition to Bridge CF under the criteria set forth below.
 - a. To transition to Bridge CFS from Reassessment CFS, the Reassessment CFS Customer must submit a new request.
 - i. The new request may be submitted at any time.
 - ii. The queue time of the new request is when the customer submits it.
 - iii. The Deal Ref of the new request must reference the Reassessment CFS TSR.

¹A type of Conditional Firm Service that Transmission Services offers and the Customer accepts until Long-Term Firm becomes available. Bridge service provides Customers with a fixed annual Number of Hours or System Conditions subject to Conditional Curtailments that the Transmission Provider cannot unilaterally change as long as the service remains Bridge service.

- iv. The Customer must enter the comment, “CFI TSR for TSR (Reassessment CFS TSR A-ref number)” into the customer field of the new request.
- b. The POR and POD of the new request must be identical to the POR and POD of the Reassessment CFS reservation.
- c. The source and sink of the new request must be identical to the source and sink of the Reassessment CFS reservation.
- d. The term of the new request must be identical to the term of the Reassessment CFS reservation.
- e. The capacity of the new request must be equal to the capacity of the Reassessment CFS. If additional capacity is needed, this would be done as a separate request and not be part of this CF conversion.
- f. If BPA is able to offer Long Term Firm service on any or all of the new request, the corresponding Reassessment TSR will be Recalled down for the demand and time period of an executed offer.
- g. If the Customer participates in a subsequent Network Open Season and a build goes forward that will enable BPAT to provide Long Term Firm Service at embedded rates, the demand under the Reassessment CFS reservation will be Recalled to zero for the duration of the Reassessment CFS TSR and the Customer will be given a new Bridge CFS reservation table.
 - i. The new request will be for the same type of CFS (Number of Hours or System Conditions) as the Reassessment CFS reservation.
 - ii. The Number of Hours of curtailment associated with Bridge CFS reservation shall be the Number of Hours normally associated with other Bridge CFS offers made at the time.
 - iii. The System Condition(s) will be the System Condition(s) in the Reassessment CFS reservation.
- h. If the Customer participates in a subsequent Network Open Season and a build does not go forward that will enable BPAT to provide Long Term Firm Service at embedded rates, the Customer may:

- i. Continue to take Reassessment CFS; or
 - ii. Accept service at the Incremental Cost Rate and make the associated commitments required. In this case, the demand under the Reassessment CFS reservation table will be reduced to zero and the Customer will be given a new Bridge CFS reservation table. The Number of Hours of curtailment associated with Bridge Service CF reservation shall be the Number of Hours normally associated with other Bridge CFS offers made at the time.
- i. BPAT will not perform a Reassessment of the Customer's Conditional Curtailment hours during the NOS if the Customer has signed a PTSA associated with the new request.
2. BPA Transmission Services may perform a Reassessment of the Customer's Number of Hours or System Conditions no more often than once every two years. The first Reassessment can occur no earlier than two years after execution of the Table. Reassessment may occur prior to the SCD if the SCD of the reservation occurs more than two years after the execution of the Table.
3. If BPA Transmission Services chooses not to reassess the Customer Number of Hours or System Conditions by the two year anniversary of the last Reassessment, BPA Transmission Services maintains an ongoing right to perform a Reassessment. The criteria for performing Reassessments will be consistent for all similarly situated CFS reservations.
4. Reassessment results must be provided to the Customer at least 90 calendar days prior to the date on which the new Number of Hours or System Conditions would go into effect. Such notice will include the offer of a new Table. The Customer shall pay all Reassessment study costs:
 - a. If the Number of Hours necessary to continue the CFS has increased or there is a change in the System Conditions:
 - i. The Customer has the option to discontinue the CFS or to execute a new Table with the increased number of CFS hours or changed System Conditions. **Note:** It is the Customer's responsibility to ensure that any such e-Tags are withdrawn so

- that they do not incur an **Unauthorized Increase Charge**¹.
- ii. If the Customer chooses to discontinue the CFS, any CF Inventory is then available to be offered to the next eligible TSR(s).
 - b. If there is no change in the Number of Hours, the Number of Hours decreases or there is no change in the System Conditions, the Customer must continue taking CFS through the term of the reservation.
5. Reassessment and exercise of Reservation Priority (OATT 2.2) are separate processes.
 - a. If Reassessment is done shortly after rollover, the Customer's right to discontinue CFS, if the Number of Hours is increased, is not impacted by the recent rollover. The Customer retains their right to terminate the contract.
 6. BPA Transmission Services will post the results of its evaluation of the Number of Hours needed for each Flowgate or changes in System Conditions within 30 Business Days of completion regardless of whether the data indicates a need to modify the Number of Hours.

K. Deferral & Reservation Priority for CFS

1. A CFS PTP reservation has the same Deferral rights (OATT 17.7) as other Firm PTP reservations. In the event that a CFS PTP reservation converts to a Long-Term Firm PTP reservation or a Reassessment CFS PTP reservation converts to a Bridge CFS Reservation, the number of deferrals taken while the reservation was for CFS PTP service (both Reassessment and Bridge) are combined with the number of deferrals taken for the Long-Term Firm PTP reservation to determine the total number of deferrals under Section 17.7. Under Section 17.7, the total number of deferrals may not exceed five. For example, a CFS PTP reservation that has been deferred three times before it becomes a Long-Term Firm PTP reservation can only be deferred two more times.
2. A CFS PTP or NT TSR has the same TSR Reservation Priority rights (OATT 2.2) as other PTP or NT reservations except as specified herein. The relevant business practices apply to CFS as they do to other reservations.

¹Transmission Customers taking Point-to-Point Transmission Service under the PTP, IS, and IM Rate Schedules shall be assessed the UIC when they exceed their capacity reservations at any Point of Receipt (POR) or Point of Delivery (POD). Transmission Customers taking Network Integration Transmission Service under the NT Rate Schedule shall be assessed the UIC if their Actual Customer-Served Load (CSL) is less than their Declared CSL. BPA-TS will notify a Transmission Customer that is subject to a UIC once BPA-TS has verified the UIC amount.

3. If CFS converts to LTF Transmission Service, the term of Bridge Service or if Reassessment CFS converts to Bridge CFS, the term of the CFS (Both Reassessment and Bridge) counts towards the five year requirement for renewal rights under OATT Section 2.2. For example, if a Reassessment CFS reservation was for a period of five years, but service converts to Bridge CFS at the end of the third year and then converts to LTF at the end of the fourth year, the new LTF reservation has the same renewal rights as the original Reassessment CFS reservation even though it has duration of one year.
4. Because CFS is not a reservable product on OASIS, please contact the BPA Transmission Services' Reservation Desk during Core Business Hours to submit a Deferral or Renewal CFS TSR.

L. Redirects, Resales, & Transfers of CFS

1. BPA Transmission Services' business practices for these rights apply to CFS as they do to non-CFS unless otherwise specified.
 - a. Transfers of CFS are allowed per the current business practice. All requirements of CFS apply to the Transfer reservation.
 - b. Resales of CFS are allowed consistent with the **Resale**¹ of Transmission Service Business Practice and subject to the following criteria:
 - i. CFS resale transactions cannot be aggregated.
 - ii. To purchase a resale of CFS, a customer must have a signed conditional firm exhibit in their Service Agreement.
 - c. Redirects of CFS are allowed consistent with the Redirects Business Practice.
2. A LTF CF reservation may only be submitted during the Reservation Desk normal business hours of Monday through Friday, from 08:00 **PPT**² to 16:00 PPT.

M. Additional Information

Policy Reference:

- [OATT](#): Sections 1.46, 13.6, 14.7, 15.4, 19.3, 28.3, 28.7

Form

- [Conditional Firm Service Agreement](#)

Related Business Practices

- Partial Long-Term Firm Service
- Redirects
- Requesting Transmission Service
- Scheduling Transmission Service

¹A Resale is a TSR which, when CONFIRMED, conveys scheduling rights associated with all or a portion of a reservation for firm PTP Transmission Service from a Reseller to an Assignee. There are two wesTTrans OASIS options to transact a Resale: OASIS Resale: The posting of scheduling rights offered for sale on OASIS to the open market (an open auction conducted on OASIS). TransAssign: The posting of a Resale conducted off OASIS, with a pre-selected buyer (an OASIS notice of a private sale conducted off OASIS).

²Pacific Prevailing Time

- New Customer Application Process for Transmission Service
- Reservation Priority
- Deferral Service
- ATC Methodology
- ATC Impacts of Long-Term Firm Requests
- ATC Methodology Margin (AMM) and De Minimis Impact Dead-Band
- ATC Short-Term Firm
- Network Open Season Bulletins
- Redispatch and Curtailment

Version History

Version 17	<p>9/18/2014 Version 17 includes the following changes: • Section B. 10: Clarifies that CFS may not be used for any transaction that requires a suffix. • Section C. 2: Removes the “no earlier than 13 calendar days from the Date of Tender...” language in Section C to allow Transmission Services to change the TSR’s status upon the return of a signed CF Service Agreement. • Section J.1.d: Clarifies that the term of the remainder request must match the term of the Reassessment CFS. • Section J.1.f: Clarifies the actions taken against a Reassessment TSR if BPA can offer Long-Term Firm service on all or part of the new request a Customer submits to transition from Reassessment to Bridge CFS.</p>
Version 16	<p>02/15/13 BPA has modified Section L of this business practice as promised in its OATT filing of March 29, 2012 to allow customers to redirect and resell CFS PTP on a long-term basis where it had been previously more restrictive. A new section E.3 was added to describe the e-Tagging process for the scheduling of a System Conditions Conditional Firm reservation. Step F.7, which addresses firming up conditional firm transmission, was inadvertently deleted in Version 15 and it has been put back into this version of the business practice.7. Step F.7 states: For a CFS TSR to be eligible to be Firmed Up with STF ATC, no e-Tags can be in place for the month being Firmed Up. If the LTF CF-6 PTP or NT reservation has any reductions (such as those due to e-Tags, Redirects, Recalls, or Resales) against it, it will not be Firmed Up. Specific changes to Version 16 included:</p> <p>Section E</p> <ul style="list-style-type: none"> • Step 2: Added "as a result of receiving Short-Term Firm (see Section F below)" • Added step 3 <p>Section F</p>

	<ul style="list-style-type: none"> • Added step 7 <p>Section L</p> <ul style="list-style-type: none"> • Step 1.b and 1.c: Deleted "Short-term" • Step 1.b.iii and steps 2 - 3.c: Deleted steps
Version 15	<p>10/22/12 Modified Sections L.1 and L.2 of this business practice to allow customers to redirect and resell CFS PTP on a short-term basis. In addition section L.3 gives customers a very limited ability to do long-term redirects. Section F.7 was deleted since it is no longer necessary.</p>
Version 14	<p>07/02/12 Version 14 includes the following updates:</p> <p>Section C: Moved Step C.1 and C.2 to Section B. These two items (the Customer deciding what type of Conditional Firm they want to be offered and the Customer being prepared to pay for studies if studies are needed) are more appropriately Characteristics of CFS and not part of the CFS Offer and their location in Section C was causing Customers confusion.</p> <p>Section F: BPA is assessing availability of Short-Term Firm for CFS not only four months out but also one, two and three months out as Order 890 talks about so Section F.2 was modified to reflect this.</p>
Version 13	<p>03/16/12 Version 13 has been revised to incorporate the System Conditions option and provide the details for offering System Conditions Conditional Firm Service. Version 13 includes the following updates:</p> <ol style="list-style-type: none"> 1. Section A: <ul style="list-style-type: none"> • Step 1: Deleted "BPA filed a new OATT incorporating CFS on October 3, 2008.:" 2. Section C: <ul style="list-style-type: none"> • Step C.1: Added "The Customer will receive a letter prior to the CFS offer asking the Customer if it is interested in an offer of: 1) the Number of Hours option, 2) the System Conditions option, or 3) both options. If the Customer does not respond to the letter within 21 days of the date of the letter, BPA will make only a Number of Hours offer." • Replaced step C.2 • Added step C.3.h 3. Section G:

	<ul style="list-style-type: none"> • Added steps G.1.c and G.1.c.i • Added "For Number of Hours CFS," to steps G.4.c-f <p>4. Section I: Added "or System Conditions" to step I.4.b</p> <p>5. Section J:</p> <ul style="list-style-type: none"> • Added "The new request will be for the same type of CFS (Number of Hours or System Conditions)as the Reassessment CFS reservation." and "The System Condition will be the System Condition in the Reassessment CFS reservation." to step J.1.f • Added "The System Condition will be the System Condition in the Reassessment CFS reservation." to step J.1.g.ii • Revised steps J.2, J.3, J.4, J.4.a, J.4.a.i, J.4.b and J.6
Version 12	12/16/11 Version 12 added language on how a Reassessment CFS Customer can participate in NOS and obtain a Bridge CFS reservation. version 12 includes the following changes: Section C: Deleted "in any NOS" from step 1; Section J: Rewrote step 1. Added step 1.a through 1.h; and Section K. Rewrote steps 1 and 3.
Version 11	05/12/11 E-tagging Requirements for CFS section deleted 2.c.i and updated 2.c and added 2.d.
Version 10	12/02/11 Version 10 includes the following changes: • Step 2.5: Added “or 7-FN” and “respectively”. • Step 6.2.3: Added “however”. • Added step 6.2.3.1. • Step 7.5: Deleted “of 7-F” and added “a firm”. • Step 8.3: Added “firm” and “or redispatched for” and deleted “of 7-F” and “7-F”. • Step 8.4.6: Add “firm” and deleted “at the firm (7-F) priority level”.
Version 9	04/12/10 This version update includes the following minor change: • Step 8.2.2.3: Added this section to note that curtailments of wind generators as a result of Dispatcher’s Standing Order 216 will no count towards the Number of Hours.
Version 8	02/23/10 This version update includes the following minor changes: • Step 4.1: Changed how conditional firm is offered for NOS 2010 and beyond. All TSRs will continue to be eligible to receive an offer without making that election at the beginning of NOS. • Step 4.2: Deleted this step so conditional firm will continue to be offered using the same criteria for eligibility that we use today. The Customer can still refuse to take conditional firm and remain in the queue as long as they have signed a PTSA. • Step 12.1: Clarified how many deferrals a Customer can have for a combination of CF and LTF and split Step 12.1 into Step 12.1 and Step 12.2.

Version 7	01/25/10 This version update includes the following minor changes: • Step 6.1: Added a P to PTP. • Step 8.5.3: Deleted the word receive. • Step 13.1.2: Deleted the word of. • Step 13.3.4: Moved as new step 3.9.
Version 6	12/29/09 This version update provides clarification on when to firm up an offer of short-term firm transmission for a conditional firm reservation that has a service commencement date more than 60 days in the future (step 7.12) and to clarify that the redirect used to conform a Newpoint will retain its NERC priority of 6-NN (step 13.3 and 13.3.4)
Version 5	12/01/09 The following business practice is not being posted for customer comment. This version is updated to reflect changes as a result of the elimination of sheltering. It will be reposted on the Business Practices web page prior to December 1, 2009.
Version 4	06/22/09 This version changes the effective year in Step 4.1 and adds clarification to Section 4, Step 4.4 on the timeframes for OASIS status modifications from the Date of Tender.
Version 3	05/19/09 Version 3 includes the following changes: Section 2 • Deleted definition 2.2 • Added “if needed” to definition 2.4 Section 3 • Clarified steps 3.3.1, 3.3.3.2-3.3.3.3, and 3.3.4 • Added step 3.3.3.1 Section 4 • Clarified step 4.5 Section 7 • Added “If the Transmission Customer has a CFS reservation which has Subgrid issues, that reservation will not be eligible for STF ATC.” to step 7.1 Section 8 • Added step 8.5.3 Section 10 • Clarified steps 10.1, 10.2, and 10.4.2
Version 2	04/24/10 This version adds a new section (section 9) that describes Curtailment testing protocol and adds a couple of clarifying statements in sections 10 and 12 regarding how contract term will be treated upon conversion of Bridge CFS to full LTF and rollover of CFS. Other changes are wording clarifications.
Version 1	02/25/09 The Federal Energy Regulatory Commission (FERC or Commission) adopted a requirement for Transmission Service Providers to offer CFS (See Order No. 890 and Order 890-A). To review the Commission’s discussion and determinations regarding CFS in Order No. 890, see paragraphs 962 to 1094. To review the Commission’s discussion and determinations regarding CFS in Order 890-A, see paragraphs 545 to 594. BPA filed a new OATT incorporating CFS on October 3rd, 2008.