



# NT Redispatch and Attachment M

# Feedback from June TC-20 Workshop

A large number of NT customers, both individually and through customers groups, support BPA proposed Alternative 4.

- Maintain ability to provide NT Redispatch solely from the FCRPS or from all Network Resources by replacing the “except as provided in Attachment M” language with language that accomplishes this objective.
- Remove Attachment M from the tariff but retain the provision of Discretionary and Emergency Redispatch from the federal system through the Redispatch and Curtailment Business Practice.

# Feedback from June TC-20 Workshop (Continued)

- Some customers stated that discretionary and emergency redispatch from the Federal system is a fundamental term and condition of service and should remain in the tariff.
- One customer group requested more information on the costs and benefits of non-Federal NT Redispatch.
- One customer group implied that the creation of conditional Network Service was in part a means to work around BPA's NT Redispatch policies.
- One customer group commented that the tariff language should clarify that the costs of NT Redispatch be shared by NT customers based on load ratio share and not allocated to PTP customers.
- One customer requested that BPA clarify that it will not seek to redispatch "off-system" Designated Network Resources.

# Response to Customer Comments

Customer statement that discretionary and emergency Redispatch from the Federal system is a fundamental term and condition of service and should remain in the tariff:

- Attachment M sets forth procedures by which Transmission Services requests Redispatch of the federal system by Power Services.
- Attachment M creates neither rights nor obligations between BPA and its PTP customers. In fact, the PTP portion of the tariff contains no references to Attachment M.
- Discretionary and emergency Redispatch are options that BPA has to manage its transmission system and maintain reliability. It is one of many tools that BPA uses to reliably manage its transmission system.
- Because discretionary and emergency Redispatch are implementation tools and because Attachment M simply reflects an arrangement between Transmission Services and Power Services, it is appropriate for a business practice.

# Response to Customer Comments (Continued)

## Benefits and Costs of Non-Federal NT Redispatch

- Based on preliminary analysis, BPA proposes to maintain flexibility in the tariff to implement non-federal NT Redispatch in the future if or when the benefits justify the costs.
- In 2016, NT customers provided information to BPA on the capability and availability of network resources to respond to NT Redispatch requests. The identified resources do not include “system” DNRs, the availability, costs and benefits of which are difficult to quantify.
- BPA’s preliminary analysis of this information indicated 105 MW of possible INC resources and 234 MW of possible DEC resources in locations with potential to provide congestion relief.
- For this relatively small amount of INCs and DECs, BPA would incur costs to modify dispatch and billing systems and procedures.
- Customers would also incur costs to modify their dispatch and settlement systems and procedures.
- Given that BPA has implemented NT Redispatch on few occasions over the years, the costs of implementation do not appear to justify the modest benefit of non-Federal NT Redispatch.
- BPA’s tariff proposal provides for the flexibility to revisit implementation of non-Federal NT Redispatch in the future.

# Response to Customer Comments (Continued)

Customer stated that the creation of conditional Network Service was in part a means to work around BPA's NT Redispatch policies.

- This is an incorrect assumption. The ATC calculation and BPA's subsequent acceptance of a customer's Designated Network Resource are in no way impacted by BPA's policy on NT Redispatch. NT Redispatch is a tool used to manage congestion in real time.

# Response to Customer Comments (Continued)

## Allocation of NT Redispatch costs to NT Customers

- The proposed tariff language clearly states in section 33.3 that Network Customers bear the cost of NT Redispatch.
- Load ratio share is not the BPA NT billing factor. BPA uses Network Load as the billing determinant for NT service. BPA's current and proposed tariffs reflect this difference from *pro forma*.



# Response to Customer Comments (Continued)

Regarding potential treatment of off-system DNRs should BPA decide to redispatch non-Federal Network Resources:

- Details related to which NT Resources would be subject to NT Redispatch are appropriate for a Business Practice or other implementation protocol, not the OATT.
- BPA will consider these comments when and if BPA pursues the redispatch of all Network Resources.



# What are we proposing?

- After reviewing these comments, BPA continues to believe that maintaining the flexibility to provide NT Redispatch solely through the FCRPS or from all Network Resources in the future provides significant benefit to the region.
- BPA's proposed treatment of NT Redispatch and Attachment M received support from a large number of customers, particularly NT customers.
- Some customers raised questions and had additional suggestions.
- Despite its historical inclusion in BPA's tariff, Attachment M is a procedural document. Its content, therefore, is appropriate for a Business Practice.
- BPA supports its original proposal:
  - BPA proposes to maintain its ability to provide NT Redispatch solely from the FCRPS or from all Network Resources by replacing the "except as provided in Attachment M" language with language that accomplishes this objective.
  - BPA proposes to remove Attachment M from the tariff but retain the provision of Discretionary and Emergency Redispatch from the federal system through the Redispatch and Curtailment Business Practice.