

Response to Comments – Network Integration (NT) Transmission Service

BPA Transmission Business Practice

Version 14
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Version 14

This document contains comments and BPA’s response regarding the Network Integration (NT) Transmission Service Business Practice, Version 14, posted for comment from January 10 to February 2, 2024.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. Umatilla Electric Cooperative

Re: BPA NT Business Practice Proposed Revisions

Umatilla Electric Cooperative (“UEC”) is a load serving entity located in Umatilla, Morrow, and Union Counties in eastern Oregon. UEC is an electric cooperative made up of residential, commercial, irrigation, and industrial loads, and is owned by the members it serves. UEC holds both an NT Transmission Service Agreement and Regional Dialogue Power Sales Agreement with the Bonneville Power Administration (“BPA”).

The following comments are in response to BPA’s proposed modifications of its Network Integration (NT) Transmission Service Business Practice, which were posted on January 10, 2024. On January 19, BPA discussed the proposed revisions with customers and also indicated that it will initiate a more substantive, wholistic revision to the NT Business Practice at a later date this year. Given this fact, UEC proposes that BPA delay this currently proposed revision and combine any changes with this more wholistic, “Category B” revision expected to be proposed later this year. UEC believes this would be more efficient both in terms of business practice modifications by BPA but also from a customer implementation perspective. Otherwise, this updated version will be out-of-date upon posting.

BPA Response

BPA shares UEC’s desire for efficiency. BPA made a conscious decision to propose these edits in relation to a broader effort at the Category A level. BPA does not anticipate that Category A modifications would require implementation efforts on the part of our customers. A delay of Version 14 would not expedite more substantive proposed updates to the business practice.

With no indication from commenters that the specific modifications proposed in Version 14 are concerning, BPA believes it would be most efficient to implement the business practice rather than delay and impose a second review in a future proposal.

While BPA recognizes that future Category B updates will be needed in this business practice; currently, no specific timeline for that effort has been established.

Please see the BPA response to UEC's Item 4 addressing the concern that this version of the business practice would be out-of-date upon finalization.

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With that said, UEC is submitting the proposed comments in the event that BPA disagrees with this more efficient approach:

(1) Section B. Load & Resource Forecasts

- Remove B.2.b. "NT Customers are not required to submit federal resources forecasts in the LaRC." Otherwise, the text in B.2. and B.2.a. is inconsistent with the current LaRC spreadsheet template, and invites confusion with the language in F.3.a.

BPA Response

BPA agrees the language invites confusion for NT customers and has removed the section, "NT Customers are not required to submit federal resources forecasts in the LaRC," from the business practice.

(2) Section B. Load & Resource Forecasts

- Section B.11. does not reference the role of the Customer Support Services, and specifically, the Load Forecasting & Analysis engagement with BPA's NT customers. We suggest that this omission be remedied.

BPA Response

The Load Forecasting & Analysis organization at BPA is not associated with the NT Data Exhibit information provided under Section B.11 of the business practice. The customer's assigned Transmission Account Executive is the point of contact when a Data Exhibit is necessary as described in Section B.11.a. Section B.1.b describes interaction with a BPA forecaster to meet the annual forecast update obligation. BPA believes the language referenced in this response sufficiently addresses this concern.

(3) Section D. Reserving Transmission Capacity for Forecasted Non-federal Network Resources

- D.1. This language ignores the fact that to date, BPA has split FSTR awards (associated with singular, non-Federal PORs) into multiple FTSTRs making tracking and submittals for designated TSRs clumsy and inefficient. We strongly suggest that BPA update its system so that FTSTRs are consolidated or aggregated when involving the same POR.

BPA Response

In some circumstances BPA may split FTSTRs due to differences in submittal timing. BPA aggregates FTSTRs that have the same POR to the same POD with the same characteristics

when possible. These aggregations do not require a change to the business practice language.

(4) Section D. Reserving Transmission Capacity for Forecasted Non-federal Network Resources

- D.4. This language is outdated. While BPA requested more specificity in the LaRC, it accepted COLMBIA230CHPD in the 2023 LaRC submittal temporarily, as it then *required* a specific resource to be identified in order to study the viability of that POR. The proposed business practice language perpetuates the notion that BPA accepts a lack of specificity that it claimed (as part of the 2023 LaRC) it needed in order to evaluate the viability of a request.

BPA Response

The process as described in Section D.4 of the business practice is current. BPA accepts COLMBIA230CHPD as the Source on an FTSR and follows up with the customer by letter (identified in Section B.12 of the business practice), whereupon the customer may designate a specific resource as allowed per that letter (via an NT Data Exhibit identified in Section B.11 of the business practice).

BPA modified the “Section B.12.a” reference in Section D.4.a to “Section B.12.”

(5) Section E. Designation of a New Network Resource

- Remove E.4. This language is redundant to the Requesting Transmission Service business practice, which is the “controlling” business practice for deadlines including the deadline for Long-Term designation of Network Resources.

BPA Response

The language in Section E.4 is specific to a TSR submittal that is designating against an FTSR. BPA retains this important information in the business practice to ensure clarity for NT customers.

(6) Section F. Additional Requirements for Designating Network Resources

- F.1.c. There is a lack of specificity in this business practice in terms of how shaped service is handled. If, as stated in this section, “A designation of a Network Resource for less than one (1) year cannot be netted against an FTSR.”, then what is BPA’s instruction, e.g., use short-term or non-firm (secondary) transmission service? Moreover, shaped service that extends beyond one (1) year should be netted against an FTSR, resulting in a shaped FTSR. Please clarify.
- F.2.c. is duplicative of the NWH references contained in D. 4.a. and D.4.b. The two should be combined to avoid confusion.

BPA Response

Yes, in the situation described by UEC, customers may use short-term or non-firm (secondary) transmission service. Customers may also submit a long-term 1-year TSR with a shaped monthly profile that can include zeros for up to 11 months for netting against a CONFIRMED FTSR. Customers may contact their Account Executive for additional information.

BPA agrees that the information in F.2.c. and D.4. may be viewed as a duplication; however, in this case, BPA has chosen to include the information regarding this requirement in both locations along with the context provided by each section.

(7) Section J. Use of PTP Transmission Service

- J.1. is misleading as it does not reflect allowances reflected in BPA's tariff. After the words "provided that" insert "a Network Customer elects to designate less than its total load as Network Load. However, if the NT Customer uses a Point of Delivery (POD) for both NT and PTP service," the NT Customer continues to pay the NT rate for full load service and the PTP contract holder pays the full PTP Transmission Service. UEC proposes the following insertion "Alternatively, if the NT Customer elects to designate a particular load at a discrete POD, then the NT rate will be applied to the full load service minus the load served at the discrete POD, and the PTP contract holder will pay the full PTP Transmission Service.", and delete the following, "Neither the Network Load nor the NT bill will be reduced by the amount of load served with PTP Transmission Service."
- Remove J.2. This language is inconsistent with Section 30.3 of the BPA tariff, which is only intended to address the "Termination of Network Resources" and has no bearing on a customer's use of PTP Transmission Service. So either the reference to Section 30.3 is incorrect, or the substance of the business practice language is erroneous. Furthermore, Section G of the NT Business Practice already addresses Undesignation of a Network Resource.

BPA Response

The language in Section J.1 does not preclude a customer from serving load at a discrete (electrically distinct) Point-of-Delivery with PTP Transmission Service rather than NT Transmission Service. This language describes that Designated Network Load served with PTP at a Point of Delivery that is not a discrete Point of Delivery will not result in a discount of the NT billing in alignment with the BPA Tariff.

BPA is taking the UEC comment on Section J.1 and Section J.2 under advisement and will review this language with a future Category B update to this business practice.

UEC appreciates the opportunity to provide comments on BPA's proposed NT Business Practice, but again, we believe any changes should be included with the forthcoming "Category B" update that BPA stated would occur later this year. We look forward to this upcoming revision.

BPA Response

As stated in the first comment response, BPA does recognize that future Category B updates will be needed in this business practice; however, no specific timeline for that effort has been established.

BPA would like to thank UEC for these detailed and constructive comments regarding the Network Integration (NT) Transmission Services Business Practice.