

Response to Comments –
TSR Study and Expansion Process V8
Requesting Transmission Service V44
Network Integration (NT) Transmission Service V13

BPA Transmission Business Practice

3/21/2023

Response to Comments – TSR Study and Expansion Process V8 Requesting Transmission Service V44 Network Integration (NT) Transmission Service V13

This document contains comments and BPA’s response regarding the TSR Study and Expansion Process V8; Requesting Transmission Service V44; and Network Integration (NT) Transmission Service V13 posted for comment from January 19, 2022, to February 24, 2023.

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

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A. Powerex Corp.

RE: Bonneville’s TSR Study and Expansion Process V8; Requesting Transmission Service V44; Network Integration (NT) Transmission Service V13 business practices

Powerex appreciates the opportunity to comment on Bonneville’s TSR Study and Expansion Process V8; Requesting Transmission Service V44; Network Integration (NT) Transmission Service V13 business practices. Powerex understands, based on the workshop material presented on January 26th, 2023, and the posted redlines for the business practices, that Bonneville is proposing a change to the submission process for Long Term Firm (LTF) Transmission Service Requests (TSR). Bonneville’s states that its proposal will “facilitate earlier validation of a LTF TSR and allow more time to align the Data Exhibit, TSR, or NT forecasts as needed”, and Bonneville has revised the Requesting Transmission Service V44 business practice to require a submission of a Data Exhibit on the same day that the request is queued. Powerex also understands that Bonneville is proposing to require already queued LTF TSRs to submit Data Exhibits within 30 days of the business practices becoming effective, and Bonneville would decline any requests that do not meet that timeline.

Powerex appreciates Bonneville exploring opportunities to make the long-term submission process and cluster study process more efficient for transmission customers, however, Powerex is concerned regarding the onerous requirements to complete and submit a PTP Data Exhibit on the same day that the TSR is queued. Powerex is also concerned that when a transmission customer submits a TSR closer to the end of the business day that Bonneville

staff may not be available to answer any questions, and a Data Exhibit submission may become infeasible and lead to a declination of the TSR.

Powerex suggests that Bonneville allow for Data Exhibits to be submitted within 5 Business Days after the TSR has been queued. Powerex's suggestion allows sufficient time for a transmission customer to seek assistance and request clarifications from Bonneville staff regarding the Data Exhibits before a submission is made. The additional time requested by Powerex will not hinder Bonneville's objective to receive the required information in a timely manner. Powerex's suggestion also aligns with the timing requirements for the associated deposit and processing fee that complete the LTF application.

Powerex appreciates Bonneville considering our comments and suggestions on this matter.

BPA Response

Bonneville appreciates the comments from Powerex. Powerex suggests that Data Exhibits be allowed to come in up to five days after a TSR is submitted, in order to seek assistance and request clarifications from Bonneville staff.

Bonneville notes that Customers can and are encouraged to work with their assigned Account Executive and other Bonneville staff in order to ensure the Data Exhibit has valid data prior to TSR submission. Bonneville staff will be available prior to the TSR submittal to work with the Customer to prepare a Data Exhibit.

Bonneville has OATT-driven TSR processing timelines that start when the TSR is QUEUED. In this business practice change, Bonneville is requiring the Data Exhibit information in order to consider the TSR submission as a completed application. Delaying the processing of a TSR until the Data Exhibit is received could cause Bonneville to miss TSR processing deadlines. Bonneville needs to receive the Data Exhibit on the same day as the TSR in order to validate and process the TSR quickly and meet tariff deadlines.

Once Bonneville receives a Data Exhibit, the Customer still has an opportunity to correct deficiencies. Bonneville will notify the Customer via email on whether there are deficiencies, and the Customer will have five (5) Business Days from the date of the notification to cure a Data Exhibit that has deficient information. Bonneville believes this Data Exhibit validation process provides the time necessary for the Customer to seek assistance and request clarifications if necessary.

B. Shell Energy North America

Shell Energy North America (US), L.P. ("Shell Energy") appreciates the opportunity to submit comments to the Techforum regarding BPA's proposed TSR Study and Expansion Process (TSEP) Transmission Business Practice changes.

Upon reviewing the proposed changes to the business practices (specifically Section H3 & 4 and Section I3), Shell Energy is concerned there will not be sufficient time to complete internal review and approval processes to meet the deadlines or adhere to the instructions proposed by BPA. Failure to meet procedural schedule deadlines and/or instructions places

transmission customers at risk of receiving no further consideration for LTF service as BPA would decline the queued TSR.

The proposed changes to conform the Start and Stop Dates for TSRs in OASIS to align with the estimated Scheduled Commencement Date (SCD) of the Plan of Service and extending the duration of the TSR beyond the SCD by the duration of the originally queued TSR will undoubtedly require transmission customers to seek higher levels of approval—thus requiring more lead time for management consideration. For Shell Energy, “tacking on” the additional duration beyond the SCD would necessitate approval by the executive committee of Shell Energy’s parent, Shell plc in London.

Shell requests BPA to work proactively with its transmission customers by providing information necessary to complete review and approval process prior to the issuance of formal notifications that kick off time sensitive deadlines. Alternatively, Shell Energy suggests BPA provide necessary details associated with the TSR Plan of Service and conforming Start and Stop Dates to transmission customers a minimum of 90 days in advance of required deadlines. This 90-day timeframe ensures customers are able to meet internal review timelines in order to respond accordingly in the TSEP process.

BPA Response

BPA appreciates Shell’s comments, suggestions, and concerns about having enough time to respond to instructions from BPA for conforming a TSR to enable BPA to offer service. Service offers are important to both Customers and BPA. Prior to the release of conformance instructions, BPA, through the Customer’s Account Executive, will inform Customers of the need to conform term dates so that the arrival of those instructions do not come as a surprise to Customers.

Further, BPA believes that the process described below will allow Customers sufficient time for any internal processes the Customer may need to complete prior to any contractual commitment. There is significant time built into BPA’s process before a Customer is required to contractually commit to take and pay for service. The following is a brief description of the process and estimated timeline:

1. Inform Customer that the process to offer service and obtain financial security will be starting and that the customer may receive conformance instructions from BPA. This step has been added to the business practice section H.1.
2. A written notification with conformance instructions will be sent to the Customer. The instructions will give the Customer 5 Business Days from the date of the notification to submit a TSR in OASIS with the conformance parameters outlined in the instructions. Five Business Days is BPA’s standard timeframe for Customers to submit a conformance TSR in OASIS.
 - The submittal of a TSR in OASIS to conform the Customer’s term dates in OASIS does not obligate the Customer to take service. The submittal of the conformance TSR will only enable BPA to make an offer of service.
3. BPA will begin the process to draft and tender the offer of service. BPA estimates this will take 30-40 Calendar Days (45 Calendar Days is BPA’s standard timeframe for this process, including the conformance timeframe)
 - The service offers will be unsigned by BPA when tendered to the Customer.
 - Customers will have 15 Calendar Days to sign and return the service offers.

4. Once BPA receives the signed contract for service from a Customer, BPA will draft and send the Customer a separate letter requiring the Financial Security for the service. BPA estimates it will take 30-45 Calendar Days to draft and send a Security Letter to Customers.
 - Customers will be given 30 Calendar Days from the date of the Security Letter to provide the required security.
5. Following receipt of security, BPA will countersign the service offer.

Based on the timelines described above, BPA anticipates that the entire process will provide Customers an estimated 120 Calendar Days before the Customer must take action that binds the Customer to a contractual obligation.

C. Seattle City Light

Comments on Transmission Service Request Study and Expansion Process (TSEP) V8

Seattle City Light (City Light) appreciates BPA's efforts to engage with customers on impactful changes to BPA Business Practices. City Light understands the monumental task for BPA staff to both provide in-depth explanations of technical topics and balance competing interests in forward looking recommendations. We applaud BPA's willingness to consider customers' suggestions. In that light, City Light would like to offer the following comments regarding the proposed changes to the Transmission Service Request (TSR) Study and Expansion Process (TSEP) V8 business practice.

REQUIRING SUBMITTALL OF COMPLETED DATA EXHIBIT WITH TSR

City Light generally supports changes that streamline the TSR Study and Expansion process but does have concerns regarding unintended consequences of this approach on non-federal resource development.

City Light suggests that this change has ramifications for entities who have TSRs in the BPA Queue while stepping through the BPA Generator Interconnection process at the same time. These entities may not have progressed through the interconnection process far enough to have a designated Point of Receipt (POR) to include on a data exhibit.

City Light suggests that BPA provide implementation time for entities to process and react to these changes. BPA should provide a timeline and process for updating TSRs that currently do not have an associated data exhibit. This process and timeline should not delay the next cluster study process.

City Light recognizes this is an extraordinary time of great change in our electric industry and there are many challenges to addressing the unprecedented number TSRs. Many of BPA's customers are or soon will be engaged in acquiring new carbon free resources that will need BPA Transmission for delivery. City Light suggest BPA wholistically look at business process changes including other impacted processes, industry best practices, regulatory climate, and customer needs. City Light appreciates BPA receiving and considering these comments.

BPA Response

Bonneville appreciates the comments from Seattle City Light. The comments do not identify the specific “change” about which City Light is concerned, but the focus appears to be the resource information requirements in the PTP Data Exhibit rather than the requirement to provide the Data Exhibit at the time a TSR is submitted. Although a TSR and corresponding Data Exhibit both must identify a point of receipt (POR) for the TSR, that POR does not necessarily have to correspond to a final point of interconnection (POI) established in the interconnection process. If the final POI is not yet known for a proposed resource that is in the interconnection process and not yet operational, a Customer may use NEWPOINT as the POR in both the TSR and Data Exhibit. Separate from the *POR information* in the TSR and Data Exhibit, if the resource associated with the TSR is not yet operational, the Data Exhibit will require the Customer to identify a plan of service for connecting the resource to BPA’s system but it will not require the Customer to identify a final POI established in the interconnection process.

With respect to the comment about the implementation time for the changes, the new section F.2.a. in the Requesting Transmission Service Business Practice provides that a Customer with an existing TSR in the LT pending queue, without an associated Data Exhibit, will have 30 Calendar Days from the effective date of the revised business practice to submit a Data Exhibit. Bonneville expects the deadline for submission of Data Exhibits for existing TSRs in the LT pending queue to fall well before the start of the next TSEP cycle.