

Conditional Firm Service (CFS) Reconsideration Pilot

BPA Transmission Business Practice

Version 1

9/28/2023

Conditional Firm Service (CFS) Reconsideration Pilot

Version 1

This business practice describes the requirements and process for a temporary pilot program to allow Customers to request reconsideration of eligible Transmission Service Requests (TSRs) for Conditional Firm Service (CFS).

The term of the pilot and this business practice is limited to the three TSR Study and Expansion Process (TSEP) cycles beginning after the 2023 TSEP. BPA reserves the right to suspend this CFS Reconsideration Pilot at any time.

BPA Policy References

- [Open Access Transmission Tariff \(OATT\)](#): Sections 1.89; 13.2; 13.6; 14.7; 15.4; 16; 17.2; 17.5; 17.6.1; 17.6.2; 19; 20.1; 20.2; 20.3; 21; 27; 29.3; 32
- [Transmission Rate Schedules/Provisions](#): PTP Rate Schedule

For more information, visit the [BPA Transmission Business Practices webpage](#) or submit questions to techforum@bpa.gov.

Table of Contents

A. General Process and Requirements	1
B. Requesting Reconsideration of CFS	2
C. CFS Reconsideration Study Agreement.....	2
D. CFS Reconsideration Principles.....	3

A. General Process and Requirements

1. Only TSRs for which the Customer is pursuing Long-Term Firm (LTF) Transmission Service are eligible for reconsideration, and the Customer must have met all applicable requirements for pursuing LTF Transmission Service at the time the request for reconsideration is submitted. The eligibility requirements include the following:
 - a. The TSR must be in STUDY status on OASIS.
 - b. The TSR must have participated in a previous TSEP Cluster Study or Individual Study.
 - c. The Customer must have refused a previous offer of CFS.
2. A TSR may be reconsidered for CFS only one time during the term of the CFS Reconsideration Pilot.
3. BPA will use the TSR’s previously validated Data Exhibit.

4. Any offer of CFS that results from the reconsideration will be for Bridge CFS.
5. CFS attributes not addressed in this business practice are as described in the [Conditional Firm Service \(CFS\) Business Practice](#).

B. Requesting Reconsideration of CFS

1. BPA will provide a minimum 15 Calendar Day time period for a Customer to submit a CFS reconsideration request. BPA will specify the time period in the TSEP Cluster Study cycle notification.
2. To request reconsideration of an eligible TSR, the Customer must submit an email to CFSReconsiderations@bpa.gov within the specified time period and copy the Customer's assigned Transmission Account Executive.
 - a. The email must identify each eligible TSR and the AREF for each TSR.

C. CFS Reconsideration Study Agreement

1. BPA will offer a Study Agreement for the eligible TSRs for which a Customer submits a timely request for reconsideration.
 - a. The Study Agreement will describe the scope of the current study for the TSR(s) and will include the study cost.
 - b. The Study Agreement will require the Customer to provide funds in advance on a TSR MW basis. The study costs will be defined consistent with the [TSR Study and Expansion Process \(TSEP\) Business Practice](#).
 - i. If the study costs exceed the amount of funds collected, BPA may request additional funds as necessary to complete the current study.
2. The Customer must sign, return and fund the Study Agreement within 15 Calendar Days of the receipt of BPA's offer of the Study Agreement.
 - a. If the Customer fails to sign and return the Study Agreement or fails to remit the advance funding within 15 Calendar Days:
 - i. The TSR will not be reconsidered for CFS in the current TSEP Cluster Study;
 - ii. The TSR will remain in STUDY status on OASIS; and
 - iii. Any future requests for the TSR to be reconsidered for CFS during the pilot would be in accordance with the terms set forth in business practices applicable at that time.
3. Within a reasonable time following the completion of the current CFS study, BPA will make a full accounting of the actual study costs. BPA will either remit any unexpended balance or bill for any costs in excess of the advance funding the Customer paid for its actual TSR MW of study costs.

D. CFS Reconsideration Principles

1. To determine which path(s) and/or subgrid area requires CFS, the current study will use the previous study findings for the TSR under reconsideration.
2. The analysis of the TSR under reconsideration will utilize the OASIS queue time of the TSR.
3. The TSR may be ineligible for CFS as a result of the current study findings.
4. If the current study determines the TSR is eligible for CFS, the CFS conditions under reconsideration may be different than those in the previous CFS study results.
5. BPA will provide a study report to the Customer that will define CFS results for each eligible TSR. BPA will endeavor to provide the results of the reconsideration by the close of the Cluster Study within the current TSEP Cluster Study cycle.
 - a. CFS reconsideration results may be provided later than the results for the new TSRs participating in the current TSEP Cluster Study cycle.
 - b. The first priority will be to provide study results to the new TSRs participating in the current TSEP Cluster Study cycle.