

# Conditional Firm Service (CFS) Update and Review of Proposed CFS Business Practice Changes

December 7, 2021



# BPA Decision – Transition to CFS Studies

- In order to be consistent with the pro forma OATT, BPA made the decision during the Pro Forma Gap Analysis (PFGA) to transition CFS away from using the current inventory methodology to a studied methodology
- BPA previously implemented changes to the study agreements to ask customer whether they want a TSR to be studied for CFS, and if so, which type(s)
- This year, BPA is working to transition fully to studied analysis of its capability to award CFS to requesting TSRs
- Doing so means that BPA needs to make changes to two Business Practices:
  - Remove the Conditional Firm Inventory Methodology (v24) Business Practice
  - Update the Conditional Firm Transmission Service (v25) Business Practice

# BPA Decision – Transition to CFS Studies

- This discussion serves as the required review of the proposed business practice changes
- Some additional BP modifications are also included in the proposed updates
- We will also discuss the CFS study methodology that BPA will be using
- Customer Comments of the proposed changes to the CFS business practices are due on January 6, 2022

# Key Modifications in the Conditional Firm Transmission Business Practice

- Section A.4. and F.1.c.ii. - CFS Inventory will no longer be utilized. As a result BPA proposes to remove Conditional Firm Inventory Methodology and all references to inventory in the remaining CFS BP.
- Section C.1.a. and F.1.c.ii. – BPA will utilize a study to determine if it can offer CFS for a TSR and if so, what the associated conditions will be.
- Section D.3.b. – Removed, BPA will provide reassessment results at due date, and BPA will not maintain ongoing reassessment capability due to not utilizing its reassessment right.
- Section D.4.a.iv. – Change to required language for submitting new request for firm up of Reassessment CFS.

# Key Modifications in the Conditional Firm Transmission Business Practice

- Section F.1.c. – With removal of CFS inventory due to adoption of study methodology, there is no further need for the BP to explain how both LTF ATC and CFS inventory are decremented upon award of CFS offer.
- Section F.1.c.iii. If any issue (not just subgrid issue) that is preventing a CFS offer from being made is subsequently resolved for a still active TSR that requested CFS study, a CFS offer will be made at that time.

# Clarifications (Not Representative of Changes in CFS)

- Section B.2. - Customers may request to be studied for Number of Hours, System Conditions or both
- Section C.2. – Committing to participate in system upgrades to remain Bridge may involve:
  - Signing and funding a Preliminary Engineering Agreement
  - Signing and funding an Environmental Study Agreement
  - Meeting requirements of an impacted 3rd party transmission provider
  - Signing a LTF transmission service agreement and providing financial security

# Clarifications (Not Representative of Changes in CFS – cont.)

- Section D.1.b, H.1.c.i. - STF ATC is only provided to CFS reservations if there is sufficient quantity to firm up all similarly situated CFS reservations (due to CCO software module functionality)
- Section D.3.a. – corrected word “bi-annually” to “biennially” re: CFS reassessment cycle