



Conditional Firm Service (CFS) Reconsideration Pilot

Aug. 2, 2023



Why CFS Reconsideration Pilot Proposal?

- BPA recognizes that there may be significant near-term challenges to obtaining additional LTF transmission access:
 - BPA transmission system has become fairly constrained on a LTF basis
 - Substantial need for new transmission due to significant load growth
 - Substantial need for new transmission due to renewable requirements
- A number of previously identified needed infrastructure projects aren't estimated to be energized for several years (2028 – 2030+).
- BPA and its customers have become increasingly reliant on CFS for near-term service.
- BPA study outcome timing and RFP decision timing don't align.
 - Customers may not commit to CFS upon offer due to uncertainties of eventual sale of generation – i.e., business need for transmission may not be known at time of CFS offer
 - Business need for CFS may become clearer some time after initial offer of CFS

Key Driver: BPA seeks to support our customer's interim transmission needs.

What Makes CFS Reconsideration Pilot Possible?

- Can be done within the structure of the OATT.
- CFS study methodology enables reconsideration.
 - CFS study methodology will respect queue order
 - All active, previously-studied TSRs are modeled in the study
 - Minimal workload impact for BPA due to the inclusion of previously studied TSRs in the CFS study modeling
 - No changes in CFS functioning for CFS awarded through reconsideration
 - No impact to automation requirements

CFS Reconsideration Principles

- ONLY CFS will be re-examined. The plan of service will not be modified.
- The original queue position of the TSR will be used to determine which path(s) and/or subgrid areas require CFS.
- Available firm capacity that the TSR holds in its queue position will be credited to the TSR for CFS reconsideration.
 - Paths or subgrid areas without a plan of service in the original study will not require CFS capability
- There is no guarantee of eligibility for CFS.
- If a TSR is eligible for CFS upon reconsideration, there is no guarantee that previous findings (e.g. system conditions or number of hours) will hold.

CFS Reconsideration Eligibility Criteria

- The TSR was previously studied through a Cluster or Individual Study.
- The TSR was previously eligible for an offer of Bridge CFS but did not execute the offer.
 - BPA monitors the queue for changes that would impact eligibility
- The TSR is active and pursuing a path to LTF service through TSEP (i.e., it is in STUDY status in OASIS).
- Applies to each TSR individually.
- A TSR may be reconsidered only one time during the pilot period.
- No new data exhibit will be required or allowed.
- Customers currently taking CFS through TSEP process are not eligible.

CFS Reconsideration Process

- CFS reconsideration requests can only be made within a specified timeframe (will be posted), a minimum of 15 days.
- Requests for reconsideration will be made via sending an email to BPA mailbox (CFSReconsiderations@bpa.gov) and copying the Customer's Account Executive (AE) in the e-mail.
- CFS reconsideration will only be implemented as part of a Cluster Study.
- Customer must sign/fund a Study Agreement.
- CFS reconsideration will be charged at the same rate as other study participants.

CFS Reconsideration Outcomes

- Any resulting offer of CFS will be Bridge CFS.
- BPA expects to provide the results of the CFS reconsideration at the close of the Cluster Study.
- BPA will utilize a Customer election to determine if the Customer wants to receive an offer of CFS.
- If the Customer does not accept the offer of CFS, the request status will not be impacted (i.e., will remain in STUDY status).

Feedback on Proposal and Business Practice

- Please provide comments in writing by Aug. 30, 2023
 - Is this additional flexibility potentially useful to BPA customers?
 - Has BPA's development of this proposed pilot missed any key impacts, issues, or considerations?
 - Suggestions regarding the proposed pilot?
 - General comments?

Provide comments to techforum@bpa.gov with the pilot named in the subject line.