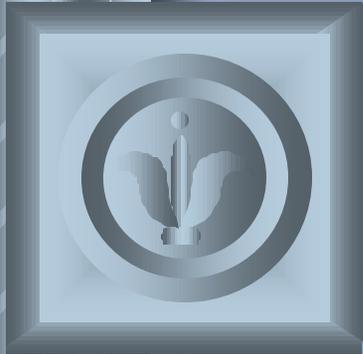
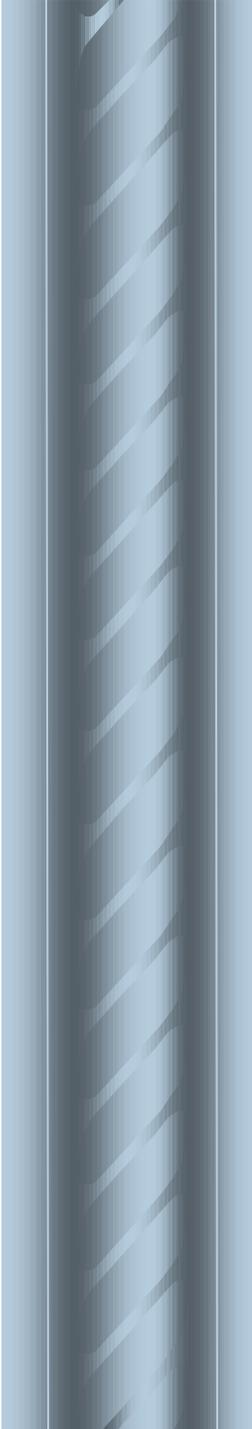


# RTO WEST



## The Revised Transmission Operating Agreement

**December 15, 2000**



**I. Inteviewer Comments Addressed in the TOA**

**II. Other Important Revisions to the TOA**

# Comments Addressed In TOA

- **COMMENTS**

- RTO West should be able to include the cost of transmission alternatives in Transmission Facility Cost Sharing Payments
- Backstop proposal is flawed because it does not allow RTO West to incur and allocate costs of non-transmission solution

- **WHERE ADDRESSED IN TOA**

- Revised Definition: Transmission Facility Cost Sharing Payments
- Revised Definition: Company Costs

# Comments Addressed In TOA

- **COMMENTS**

- RTO West should be able to contract for long-term ancillary services where necessary to deal with market power
- RTO West should be permitted to participate in forward markets

- **WHERE ADDRESSED IN TOA**

- New Section 7.3.2
- Revised Section 7.4

# Comments Addressed In TOA

- **COMMENTS**

- The access charge BPA collects from transmission owners that do not join RTO West should be limited to what such entities would pay if they had become Participating Transmission Owners

- **WHERE ADDRESSED IN TOA**

- Revised Exhibit G

# Comments Addressed In TOA

- **COMMENTS**

- The TOA does not give FTRs to non-PTO Eligible Customers in consideration of payment of the appropriate Company Rate
- The TOA must be clarified to provide load-serving entities and generator, rather than the Participating Transmission Owner, with Firm Transmission Rights

- **WHERE ADDRESSED IN TOA**

- Revised Section 6.3

# Comments Addressed In TOA

- **COMMENTS**

- The RTO West filing limits Rollover Rights to contracts which do not rely on an underlying tariff for their existence, thereby preventing the majority of contracts from qualifying for the Rollover Rights contained in Section 2.2 of the OATT

- **WHERE ADDRESSED IN TOA**

- Revised Section 5.4.3 (window for rollover and protection of loads)

# Comments Addressed In TOA

- **COMMENTS**

- Allocation of Flowpath Capability under Section 15.3 risks abrogation of existing contracts
- Pro-rata curtailments to address overallocations of Flowpath Capability should not be the first options used.

- **WHERE ADDRESSED IN TOA**

- Reorganized and revised Section 5.2
- Revised Section 15.3

# Comments Addressed In TOA

- **COMMENTS**

- Language providing FTRs for load growth should specifically include point-to-point customers

- **WHERE ADDRESSED IN TOA**

- Original Section 15.2.1 and definition of “Pre-Existing Transmission Agreement”

# Other Revisions to the TOA

- **Clarified that italicized language applies to all TOAs**
- **Section 2.4.2: Made clearer that if a PTO withdrew from RTO West, this section was intended to protect, not burden, the other PTOs and Transmission Customers**
- **Section 5.8.8: System restoration requirements clarified**
- **Section 8.2: Transmission Customer right to invoke dispute resolution as to performance plans will be in the RTO West Tariff**

# Other Revisions to the TOA

- **Section 11.1.1: Under backstop authority, RTO West may direct installation of expansions and upgrades, as well as interconnection of expansions and upgrades, to any of the Transmission Facilities**
- **Section 12: Removed planning details that might restrict RTO West in changing its planning activities in the future**
- **Section 16.4.2: Removed reporting for generation unit forced outages (so requirement could be moved to Generation Integration Agreement)**

# Other Revisions to the TOA

- **Definition of “Company Billing Determinants”:** accommodated need for BPA to afford its customers Company Billing Determinant options
- **Definition of “Firm Transmission Right”:** made clear such rights would be assignable and tradeable
- **Definition of “RTO West Critical Control Facilities”:** broadened
- **Definition of “Transfer Charges”:** provided for inclusion of charges from affiliated merchant functions
- **Exhibit H:** changed “payable to” to “receivable from”

# Other Revisions to the TOA

- **Section 5.1.2.1: Makes explicit the circumstances under which certain facilities that are distribution facilities, but also meet the definition of RTO West Controlled Transmission Facilities (because of their secondary impacts on the Total Transfer Capability of Flowpaths), will not be considered to be RTO West Controlled Transmission Facilities**
- **Among the Filing Utilities, this provision only is applicable to certain facilities of Puget Sound Energy**
- **Puget Sound Energy would be required to upgrade these facilities if so directed by RTO West (subject to cost reimbursement)**