



Access (Facilities)

March 5, 2002



Stakeholder Needs

- In order to provide non-discriminatory FERC-jurisdictional wholesale transmission service (including GTA service), RTO West must have an adequate relationship with PTO facilities that are needed to support such service (both for purposes of providing access and to address service issues)

(Kootenai Electric, Big Bend Cooperative, Inland Power and Light, Independent Generators, NRU, PNCG, SMUD, Idaho County Light & Power Association)



Filing Utility Needs

- Recognize and balance dual jurisdiction of FERC and states over certain PTO facilities
- Recognize and balance needs of wholesale and retail customers
- Provide RTO West the tools and assets it needs to do its job



Overview of Proposal

- RTO West will have the ability to provide wholesale service on all PTO facilities if the service involves any segment across transmission facilities (either “A” or “B”)
- PTOs will include as RTO West Controlled Facilities (“A”) all facilities that affect the transfer capability of WSCC-rated paths



Overview of Proposal

- RTO West will provide access over and include in its pricing additional transmission facilities as specified in facilities lists - cannot be removed from (“B”) list without FERC approval
- Filing Utilities are working on refining and reconciling facilities inclusion lists



Summary of Comments

- Some question whether proposal constitutes “one-stop shopping”
- Further clarification is needed with respect to the facilities definitions and RTO West’s authority with respect to the different classes of facilities, especially Certain Distribution Facilities
- There should be mandatory RTO West dispute resolution for all aspects of wholesale service over Electric Systems



Summary of Comments

Transmission Service

- All load should take service under the RTO West tariff; no preference should be given to a particular type of load or to PTOs who are also control areas
(Dynegy)



Summary of Comments

Facilities Inclusion

- RTO West Controlled Transmission Facilities should include all those facilities that are needed to support FERC jurisdictional services (**Independent Generators**)
- The ETO's "liberty" in selecting RTO facilities is too loosely defined in the TOA and leaves room for self-serving ETO selection of facilities and potential inequities among transmission users (**SMUD**)
- RTO West Controlled Transmission Facilities definition may result in generation being exempt from RTO emergency dispatch orders if that generation is not interconnected with the RTO grid



Summary of Comments

GTA Service

- All GTAs should be considered pre-existing transmission agreements
- Filing utilities should include all low voltage facilities used to support GTA service
 - Without such facilities, GTA customers will not see purported efficiency and cost benefits of RTO and may be exposed to:
 - Pancaked rates
 - Increased administrative and regulatory burden
 - Multiple planning forums
 - Harmed reliability and quality of service

(Kootenai Electric, Big Bend Cooperative, Inland Power and Light, NRU, PNCG, Idaho County Light & Power Association)



Summary of Comments

GTA Service (Cont'd.)

- In the absence of including such facilities or granting GTAs pre-existing agreement status, BPA and GTA facility owners must develop a contractual means to ensure, on a long-term basis, that transmission customers who require service over GTA facilities are treated fairly; that these facilities are maintained; and that reliability for the system is not diminished

(Kootenai Electric, Big Bend Cooperative, Inland Power and Light, NRU, PNCG, Idaho County Light & Power Association)



Responses

“One-Stop Shopping”

- RTO West will provide transmission service across all transmission facilities included for pricing (“A” and “B”)
- In addition, RTO West will be able to provide transmission service on “Certain Distribution Facilities”
- RTO West will be able to provide wholesale service on PTO distribution facilities for generators and electric utilities when transmission facilities are also used



Responses

Dispute Resolution for All Aspects of Wholesale Service

- Filing Utilities are considering a broad dispute resolution process related to access and service adequacy; there are concerns and none of the Filing Utilities have yet received management buy-off on this approach



Responses

Dispute Resolution for All Aspects of Wholesale Service

- Access - need to initiate service or obtain interconnection facilities - dispute resolution on a basis analogous to NRTA process for all RTO West Transmission Customers, regardless of type of facilities needed to interconnect for wholesale service
- Adequacy - quality of service comparable - dispute resolution beyond what NRTA currently provides, but on similar basis and standards
- In both cases - remedies specific and limited as with NRTA



Responses

GTA Service

- Another element of potential dispute resolution process - under consideration: With respect to GTA service under which the GTA service provider receives Non-Converted Service from RTO West - the PTO receiving GTA service would be deemed the RTO West Transmission Customer for dispute resolution and the PTO providing GTA service would agree to be an additional party to the dispute resolution
- Remedies specific and limited - analogous to NRTA