

Customer Redline Comments On the TR-12 Settlement Agreement

SCE

SCE Section 6 Redlines Only

DRAFT 11-17-10

**PARTIAL TRANSMISSION SETTLEMENT AGREEMENT
Bonneville Power Administration 2012 Rate Case**

6. BPA shall consult with transmission customers to develop and shall adopt or determine, as required by context, the following:

a. A timeline not later than January 1, 2011 for establishing dynamic transfer capability (“DTC”), such timeline to provide for completion of the items in Section 6(b) of this Settlement Agreement by a date that will enable BPA to determine DTC in accordance with Section 6(b)(v) of this Settlement Agreement;

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b. With respect to DTC:

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i. Commercial practices under which BPA allocates DTC, taking account of self-supply and other regional initiatives;

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ii. Ways to secure reliable and reasonable operational certainty for generators given the operational limits on the amount of DTC that BPA can make available;

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iii. Dynamic transfer operating agreements and rights to govern access to and use of DTC and that address potential self-suppliers’ concerns in a manner that reasonably maintains certainty and liquidity with respect to any relevant self-supply market;

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iv. A methodology for determination of DTC to ensure that the maximum amount of dynamic transfer capability is available to customers that request DTC; and

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v. DTC on customer-requested paths by a reasonable date that would allow customers to make an informed election for balancing services by the deadline for such election, May 1, 2011;

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c. More granular, seasonal balancing reserve quantities to determine the amount of reserves necessary to provide Wind Balancing Services during the Rate Period, along with more granular WIC prices for each (INC, DEC) reserve product with respect to each seasonal period;

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d. The appropriate use, if any, of the Northwest Power Pool Firm Contingent product code for wind; and

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Deleted: d. The use and terms of dynamic transfer operating agreements to govern access to and use of DTC;¶
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g. Ways through operational measures to potentially mitigate the adverse impacts of cumulative imbalances and patterns of under-delivery or over-use of energy on the FCRPS, as an alternative to the current Persistent Deviation charge.

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For the purposes of this Section 6, with respect to each item listed in Section 6(a) through 6(e), “consult” shall include, but not be limited to (i) an announcement to transmission customers; (ii) a BPA proposal, (iii) a request for comments from transmission customers; (iv) one or more meetings with BPA customers, (v) a revised, draft proposal and (vi) a final decision.