



Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621



In reply refer to: BPA-2026-00776-F

October 16, 2026

SENT VIA EMAIL ONLY TO: ibledsoe@clatskaniepud.com

Ian Bledsoe, Senior Power Analyst
Clatskanie People's Utility District
PO Box 216
Clatskanie, Oregon 97016

Dear Mr. Bledsoe,

This communication is the Bonneville Power Administration's (BPA) final response to your request for agency records made under the Freedom of Information Act, 5 U.S.C. § 552 (FOIA). Your request was received on December 12, 2025, and formally acknowledged on January 9, 2026.

Request

You seek, "...documents that describe the criteria, policies, or guidelines used by the Bonneville Power Administration to determine eligibility for the Short-Distance Discount. This includes any internal memoranda, procedural manuals, or formal criteria used in evaluating and applying this discount. Please include: -Any documents outlining the definition of "short-distance" in this context. -Criteria used to determine which resources qualify. -Any updates or revisions to these criteria over the past 10 years.

Public Information

Information partially responsive to your request scope is publicly available at the following web links:

Transmission Rates:

[Transmission Rates - Bonneville Power Administration](#)

Current Transmission Rate Schedule:

[Appendix E. Final Proposal Transmission Rate Schedules and GRSPs.BP-26-A-01-AP02](#)

Response

BPA searched for and gathered records responsive to your request. BPA collected 120 pages of responsive records from knowledgeable subject matter experts in Transmission Commercial Business Rates & Revenue, Transmission Marketing & Sales, and Transmission Customer

Service Engineering offices. Those 120 pages accompany this communication with the total number of redactions made under the following exemptions:

- 22 exemptions applied under 5 U.S.C. § 552(b)(4)
- 35 exemptions applied under 5 U.S.C. § 552(b)(5)
- 6 exemptions applied under 5 U.S.C. § 552(b)(6)

A more detailed explanation of the applied exemptions follows:

The FOIA generally requires the release of all responsive agency records upon request. However, the FOIA permits or requires withholding certain limited information that falls under one or more of nine statutory exemptions (5 U.S.C. §§ 552(b)(1-9)). Further, section (b) of the FOIA, which contains the FOIA's nine statutory exemptions, also directs agencies to publicly release any reasonably segregable, non-exempt information that is contained in those records.

Exemption 4

Exemption 4 protects “trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential.” (5 U.S.C. § 552(b)(4)). Information is considered commercial or financial in nature if it relates to business or trade. This exemption is intended to protect the interests of both the government and third-party submitters of information. BPA is relying on guidance available from the U.S. Department of Justice to withhold commercial confidential information from public release, specifically transmission customer billing information used in training presentations. The FOIA does not permit a discretionary release of information otherwise protected by Exemption 4.

Exemption 5

Exemption 5 protects “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency” (5 U.S.C. § 552(b)(5)). The deliberative process privilege protects records showing the deliberative or decision-making processes of government agencies. Records protectable under this privilege must be both pre-decisional and deliberative. A record is pre-decisional if it is generated before the adoption of an agency policy. A record is deliberative if it reflects the give-and-take of the consultative process, either by assessing the merits of a particular viewpoint, or by articulating the process used by the agency to formulate a decision. Here, BPA relies on Exemption 5 to protect internal deliberations about possible policy changes to propose in a future rate case. Records protected by Exemption 5 may be discretionarily released. BPA has considered and declined a discretionary release of some pre-decisional and deliberative information in the responsive records set because disclosure of that information would harm the interests and protections encouraged by Exemption 5.

Exemption 6

Exemption 6 serves to protect Personally Identifiable Information (PII) contained in agency records when no overriding public interest in the information exists. BPA does not find an overriding public interest in a release of the information redacted under Exemption 6—specifically employee identification numbers. This information sheds no light on the executive

functions of BPA and BPA finds no overriding public interest in its release. BPA cannot waive these redactions, as the protections afforded by Exemption 6 belong to individuals and not to the agency.

Lastly, as required by 5 U.S.C. § 552(a)(8)(A), information has been withheld only in instances where (1) disclosure is prohibited by statute, or (2) BPA foresees that disclosure would harm an interest protected by the exemption cited for the record. When full disclosure of a record is not possible, the FOIA statute further requires that BPA take reasonable steps to segregate and release nonexempt information. BPA has determined that partial disclosure is not possible.

Fees

There are no fees associated with processing your FOIA request.

Certification

Pursuant to 10 C.F.R. § 1004.7, I am the individual responsible for the records search and information release described above. Your FOIA request BPA-2026-00776-F is now closed with the responsive records provided.

Appeal

Note that the records release certified above is final. Pursuant to 10 C.F.R. § 1004.8, you may appeal the adequacy of the records search, and the completeness of this final records release, within 90 calendar days from the date of this communication. Appeals should be addressed to:

Director, Office of Hearings and Appeals
HG-1, L'Enfant Plaza
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-1615

The written appeal, including the envelope, must clearly indicate that a FOIA appeal is being made. You may also submit your appeal by e-mail to OHA.filings@hq.doe.gov, including the phrase "Freedom of Information Appeal" in the subject line. (The Office of Hearings and Appeals prefers to receive appeals by email.) The appeal must contain all the elements required by 10 C.F.R. § 1004.8, including a copy of the determination letter. Thereafter, judicial review will be available to you in the Federal District Court either (1) in the district where you reside, (2) where you have your principal place of business, (3) where DOE's records are situated, or (4) in the District of Columbia.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, Maryland 20740-6001
E-mail: ogis@nara.gov
Phone: 202-741-5770
Toll-free: 1-877-684-6448
Fax: 202-741-5769

Questions about this communication may be directed to BPA's FOIA Public Liaison, James King, at jjking@bpa.gov or 503-230-7621. Questions may also be directed to Case Coordinator, Brian Roth, at bsroth@bpa.gov or 503-230-4383.

Sincerely,

Candice D. Palen Freedom of Information/Privacy Act Officer

Responsive records accompany this communication.

CUSTOMER BILLING CENTER PHASE 5

Short Distance Discount Setup Process (To-Be Process)

Filename: SDD Business Process_Draft_6/29/2022_TPC comments.vsd

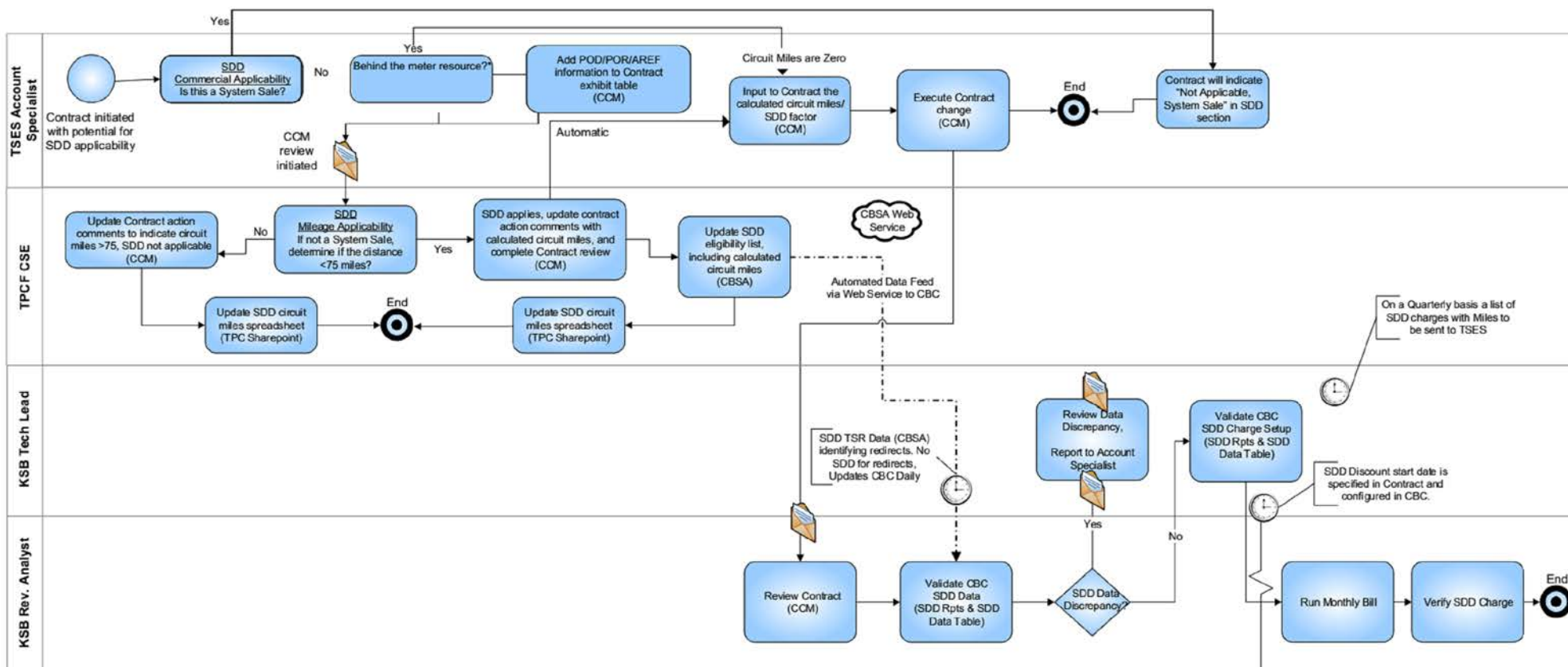
Description: Process for SDD Data Attributes to be added to CCM, CBSA, CBC.

Drawn By: Jared Lacambra

Last Printed:

Last Modified: 6/29/2022

Process Notes:
Process only occurs if a new PtoP LTF POR/POD with SDD is identified or if there is a change to an existing SDD POR/POD segment. This can occur any time of year.



Behind the meter resource:

A resource that is used solely to serve the NT Customer's Network Load and is internal to the NT Customer's system

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

GRID Modernization

TS Town Hall

Customer Billing Center (CBC) Replacement
Billing System Complexities

June 27, 2023



Purpose & Agenda

Purpose: Provide background on BPA Billing system complexity

Agenda:

1. Complexity drivers
2. Sources of BPA revenue
3. Example bill and relational data
4. Why so many charge codes?

Complexity Drivers

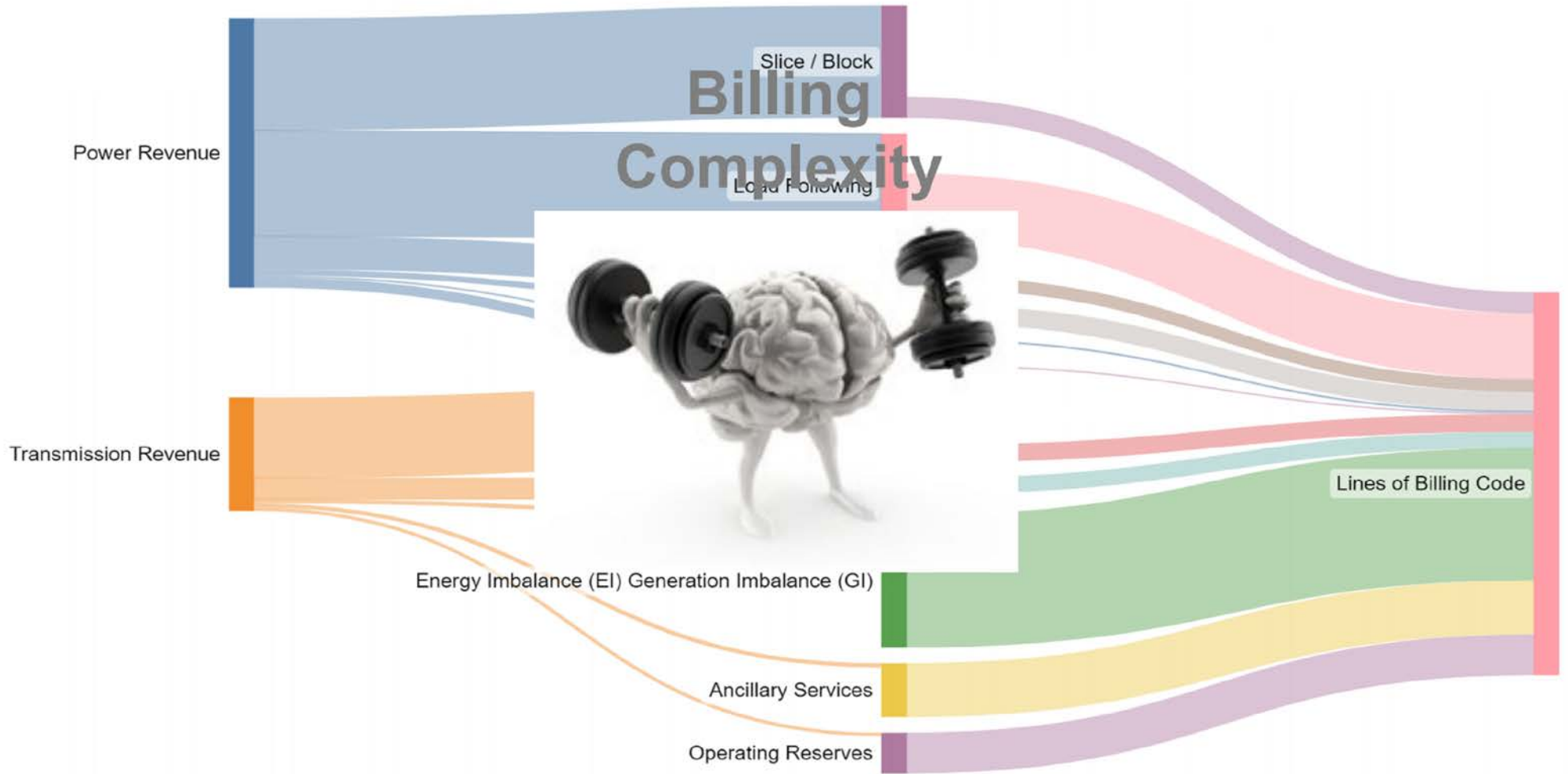
- **Core Agency Values**

- Cost Causation and Allocation: Fair and equitable across all customers
- Customer Service: PNGC as an example
- Transparency: Detailed Reports supporting bill charges

- **BPA-specific Business Requirements**

- Number of bill types, contracts, and charge codes
- The billing system is a complex calculator, calculating more than $a \times b$
- Number of system integrations & volume of data
- New products, rate case changes & their billing implementation





Is it all complex?

No. Nine Charge Codes Produced ~ 80% of Revenue.

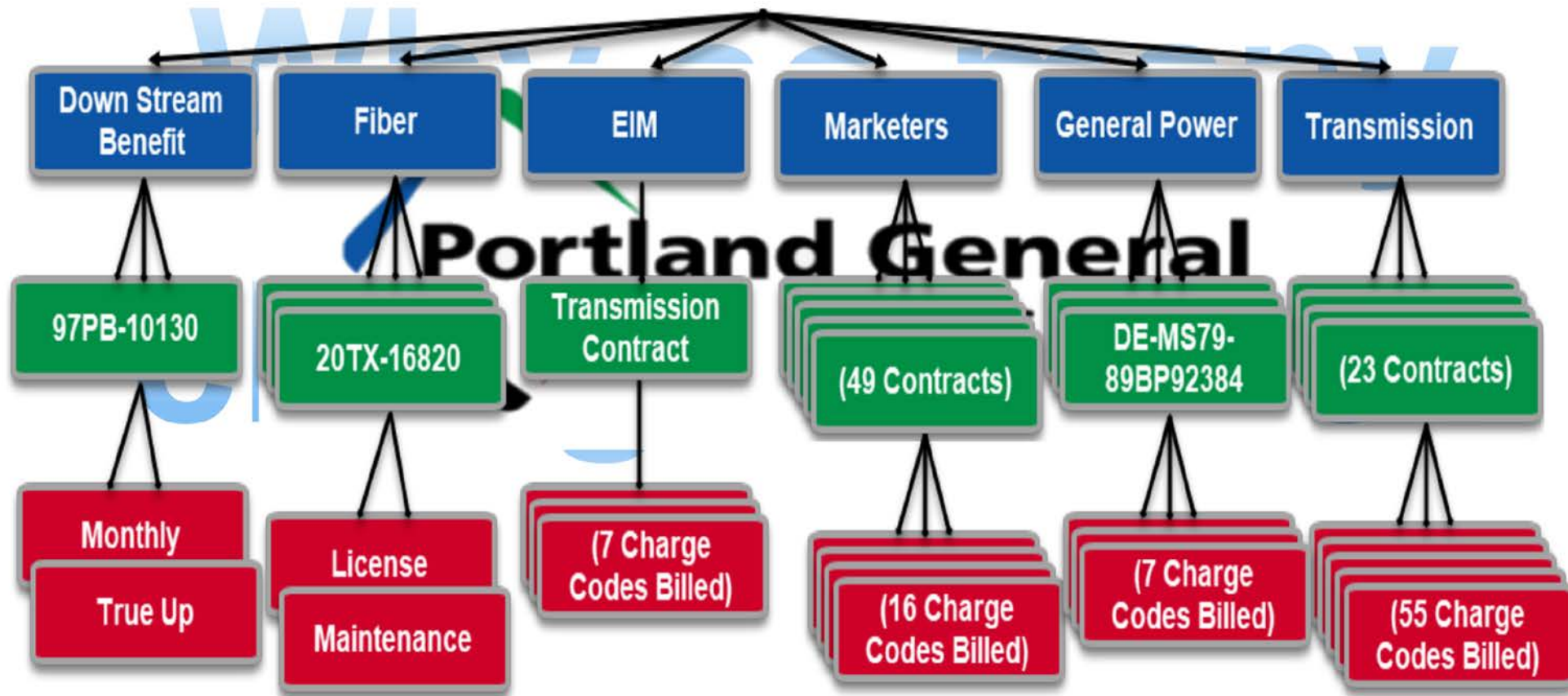
FY 21 Revenue	Description	Business	Charge Code
\$1,071,388,716	Load Following Composite Charge	Power	LF_COMPOSITE
\$605,374,008	Block Composite Charge	Power	BL_COMPOSITE
\$531,485,448	Slice Composite Charge	Power	SL_COMPOSITE
\$478,933,728	Point to Point Long Term Firm	Transmission	PTP_LONG_FIRM
\$237,988,503	Energy Composite Daily (Marketers/WSPP)	Power	SPOT_ENRGY_COMP_DAILY
\$158,742,996	Energy HLH (Marketers/WSPP)	Power	SPOT_ENRGY_HLH
\$145,388,700	Network Transmission	Transmission	NT_SERVICE_CHARGE
\$121,679,499	SCD Long Term Firm	Transmission	SCD_LONG_FIRM
\$78,373,200	Southern Intertie Long Term Firm	Transmission	IS_LONG_FIRM

What contributes to complexity?

GRID Modernization 

Business relationships

Quantity Grows	from multiple different types of business relationships with our customers
1	Agency
2	Business Lines
Hundreds	of Customers per Business Line
1 or more	Contract types per Customer (contract types can be unique by customer or a standard offer to many – or few – customers)
1 or more	Product Codes per Contract type
1 or more	Charge Codes per Product Code
Lines of code	Not all charge codes are specified in rates or contracts as quantity * rate = charge or credit; and can be the sum of the product of deviation quantity and price by interval (ie. energy imbalance, schedule quantity, etc.)
Lines of code grows	As new rates revise existing products and charges, as well as add new ones, but often do NOT subtract existing products or charges due to need to provide for billing revisions.



(b) (4)

- 6 different invoices to (b) (4)
 - Power
 - Downstream Benefits(DSB)
 - General Power (GNP)
 - Western Systems Power Pool (WSP)
 - Transmission
 - Fiber (FIB)
 - Energy Imbalance Market (EIM)
 - Point to Point Transmission (PTP)
- Different business decisions by (b) (4) require initial set up, maintenance, and monthly calculations for 300+ possible charge codes

BPA-2026-00776-F-02001.pdf

What contributes to complexity?

Products with complex charge algorithms to support regulatory needs or cost causation

<u>Power Charge Algorithms</u>	<u>Transmission Charge Algorithms</u>
Load Following Energy Shaping Service (ESS)	Operating Reserves (OR) • Pages 186-213 of the above linked document • BAL-002 increased complexity of OR calculations
	Non-EIM Energy/Generation Imbalance (EI/GI)
	Short Distance Discount (SDD)
	Preemption Competition (PCM)
	Failure for Financial Penalty (FFI)
	Locational Marginal Prices for Contingency Energy (LMP)

What does this look like for one product?

Billing Determinant Algorithm Example: PTP SDD

Charge Description:

(provide a short, easy-to-read description for what the billing determinant is used for)

This Billing Determinant is to charge Transmission Customers taking Point-to-Point (PTP) Transmission Service on the network.

PTP-16 Billing Determinant from the [Transmission Rate Schedule](#)

$$\text{PTP SDD} = (\text{PTP SDD Service Amount}) * \text{PTP SDD Rate}$$

When a Point of Receipt and Point of Delivery use FCRTS facilities for a distance of less than 75 circuit miles and are designated as being short distance in the PTP Service Agreement, the monthly capacity reservations for the relevant POR and POD shall be adjusted, for the purpose of computing the monthly bill for annual service, by the following factor:

$$0.6 + (0.4 * \text{transmission distance} / 75)$$

Such adjusted monthly POR and POD reservations shall be used to compute the billing factors in section III.A. to calculate the monthly bill for Long-Term Firm PTP Transmission Service. The POD capacity reservation eligible for the SDD may be no larger than the POR capacity reservation. System sales do not qualify for SDD. The distance used to calculate the SDD will be contractually specified and based upon path(s) identified in power flow studies. If a set of contiguous PODs qualifies for an SDD, the transmission distance used in the calculation of the SDD shall be between the POR and the POD farthest from the POR.

If the customer requests secondary PORs or PODs that use SDD-adjusted capacity reservations for any period of time during a month, the SDD shall not be applied that month.

https://portal.bud.bpa.gov/orgs/cust-sppt-svcs/KSB_Customer_Billing/Lists/Billing%20Determinants%202/Attachments/500/PTP%20Short%20Distance%20Discount.d

Billing Algorithm:

$$\text{PTP SDD} = (\text{PTP SDD Service Amount}) [\text{kW}] * \text{PTP SDD Rate} [\$]$$

$$\text{PTP SDD Service Amount [kWh]} = (\text{Sum PTP SDD Reservation}) [\text{kW}]$$

IF (PTP SDD Service Amount [kW] < 0)

THEN PTP SDD Service Amount [kW] = (Sum PTP SDD Service Amount) [kW] * [0.6 + (0.4 * circuit miles / 75)]

ELSE [kW] = 0

Query the OASIS database for all reservations that meet the following criteria.

- CBSA, Customer Billing Support, Manage Short Distance Discount
- SDD Contract Rights, SDD Eligibility
- Eligible for SDD = Y
- Customer Code = Customer OASIS Acronym
- Sale Ref = Contract Short No.
- Increment = "Yearly", "Monthly", "Weekly", "Daily", "Hourly"
- Class = "Firm", "NonFirm"
- Service Type = "Point_To_Point"
- Status = "Confirmed"
- Reservation Type = "Original" or "Renewal" or "Deferral" or "Recall"
- Segment Start Date or End Date falls within the current Bill Period (Note: a reservation may overlap several bill periods)
- POR or POD <> "COB" or "NOB" or "KFALL" or "TOWNSEND"

PTP SDD Rate [\$] = Find the PTP SDD Rate from the associated Factor Values table

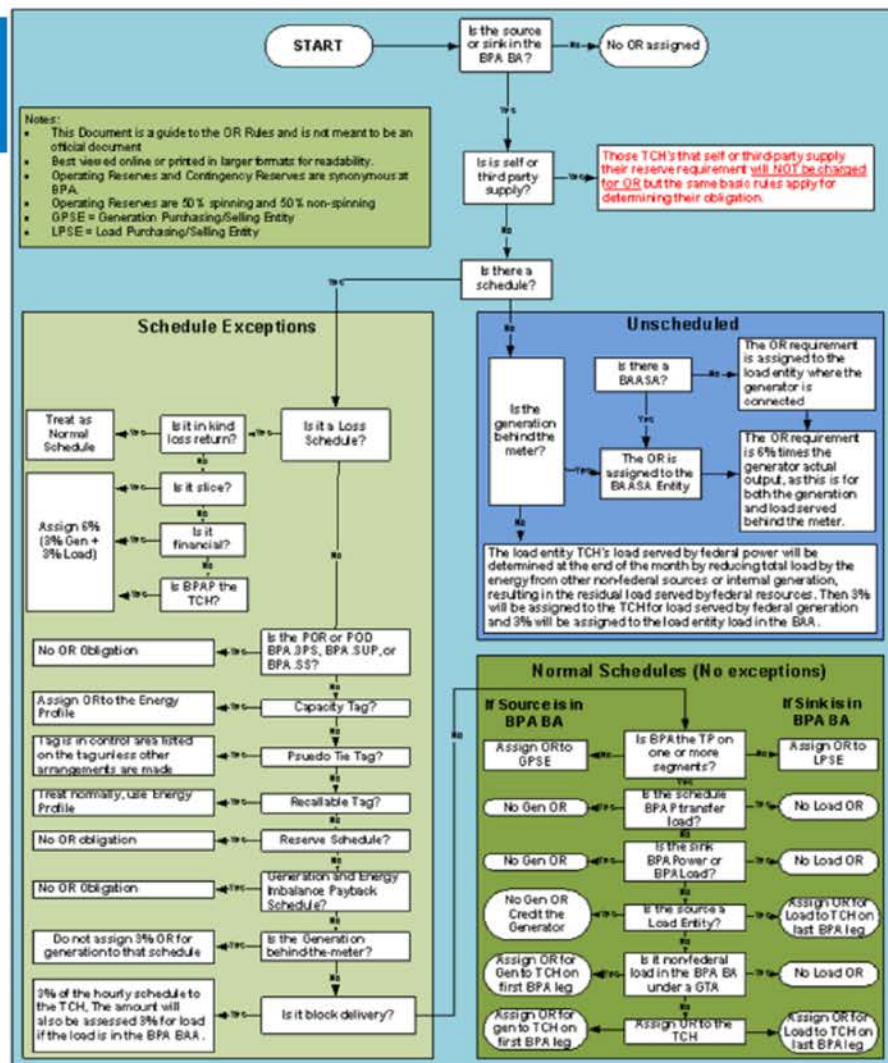
The SDD rate shall be the lesser of (i) 100 mills per kilowatthour plus the price cap established by FERC for spot market sales of energy in the WECC, or (ii) 1000 mills per kilowatthour. If FERC eliminates the price cap, the rate will be 500 mills per kilowatthour.

Note:

If the Reservation Capacity is for a period less than the full billing period, prorate the capacity for the amount of time the reservation is in effect. (i.e. a reservation that is effective for 360 of 720 hours in the month would be prorated to 50% of the original amount.)

Complex Billing Logic

- Operating Reserves billing system logic tree
 - 2,496 lines of billing code
 - 100% custom
 - 4 charge codes
 - CA_SPIN_RES_REQUIREMENT
 - CA_SUPPL_RES_REQUIREMENT
 - OR_SPIN_RES_REQUIREMENT
 - OR_SUPPL_RES_REQUIREMENT



What contributes to complexity?

Detailed billing reports to support transparency and data volumes that drive them

OPERATING RESERVES SUPPLEMENT

Customer:	(b) (4)	Bill Period:	September 2022
Bill ID:	SEP22-TRN02-10314	Period Ending:	September 30, 2022
Issue Date:	November 01, 2022		
Contract DE-HS79-078P92340		Ancillary Service Generation	Control Area Service Generation
Scheduled Transmission		Load	Load

(b)(4)

The billing system imports millions of e-tags per year for charge calculations and reporting.

- NERC BAL-002 is the driver of Operating Reserves (OR) complexity
 - The e-tag determines the responsible party
- (b) (4) OR detail report is 33 of 49 bill pages

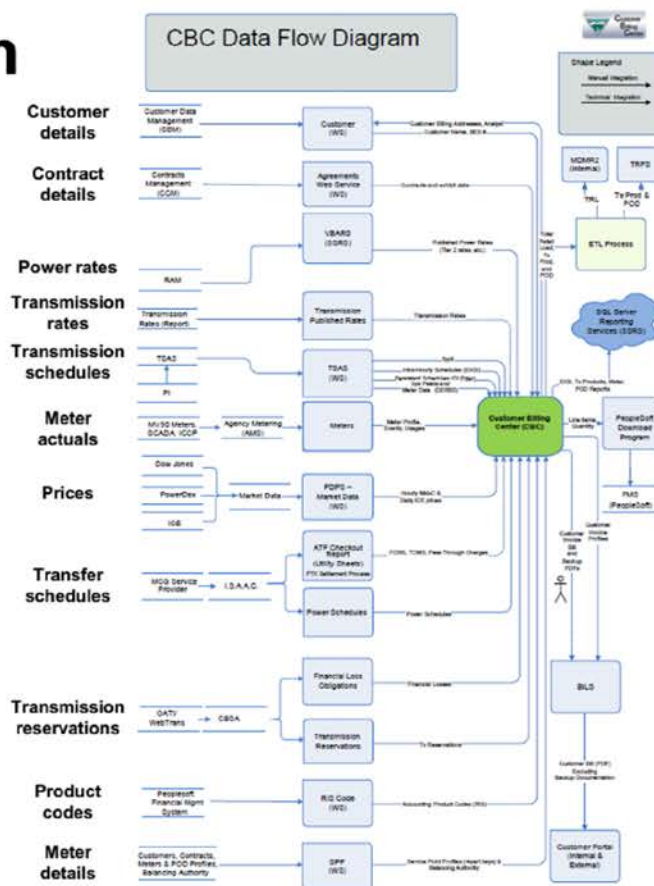
What does this look like across all data?

A complex set of Billing system integrations contributes to complexity

The CBC system is integrated with many core agency systems to drive the level of data needed to support calculation of charge codes

- Each system integration can have multiple data feeds

CBC Integration Diagram



What does this look like for one data source?

Growth of E-Tag volumes contributes to complexity across products and charge codes

Year	E-Tag Volume
2005	492,676
2010	1,243,386
2015	1,892,910
2020	2,769,203
2022	3,275,916

Billing Charges Using E-tags

Operating Reserves	Real Power Losses
Transmission Unauthorized Increase	Failure For Financial Inaccuracy
Northwest Power Pool	Contingency Energy
Energy Shaping Service	Customer Load Report Calculations

Tag Status	BPAT Status	start	stop	Creation Time
IMPLEMENTED	ACTIVE_APPROVED	7/2/2022 9:00:00 PM	7/2/2022 10:00:00 PM	7/2/2022 7:43:04 PM
DYNAMIC SCHEDULE				

Generation

GCA	UPCA	UPTP	NERC Source	NERC Source PSE	Market Product Code
BPAT	BPAT		BPAT.EIM	BPAT	G-F

Transmission Segments

SE	TP	POR	POD	TCH	Priority Code	Aref	SaleRef	Ref Type
BPAT	BPAT	BPAT.EIM	BPAT.TPU	BPAT	7-F	SERVICE-NOR		
				TPWPP2	1-NS	97238956-EIM	10103	PTP
				BPAP01	1-NS	97257221-EIM	95363	PTP
TPWR	TPWT	BPAT.TPU	TPWR.SYS	TPW1	0-NX	EIM_BPAT_I		

Load

LCA	DNCA	DNTP	NERC Sink	NERC Sink PSE
TPWR	TPWR	TPWT	TPWR_EIM	TPWPP2

Assignments

Grp Account	Title	Assignment Source
2 854991	BPAT>TPWR[EIM, J3U,	LEARNED:AUTO
3 854991	BPAT>TPWR[EIM, J3U,	LEARNED:AUTO

Candidates

Grp Account	Title	Type
2 854991	BPAT>TPWR[EIM, J3U,	LEARNED Assign Account
3 854991	BPAT>TPWR[EIM, J3U,	LEARNED Assign Account

Energy Profile

Start	Stop	MW
7/2/2022 9:00:00 PM	7/2/2022 10:00:00 PM	102

Group Profile

Date	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	h2d
Group: 2	Acct: 854991	BPAT.EIM		BPAT.TPU		1-NS		97238956-EIM																	
7/2/2022																						39			
Group: 3	Acct: 854991	BPAT.EIM		BPAT.TPU		1-NS		97257221-EIM																	
7/2/2022																						63			

Change the level of complexity? A big lift.

BPA's core values and business requirements contribute to complexity... and drive the needs of the BPA billing system

- Simplifying BPA's business would entail either:
 - *Performing complex calculations upstream from the billing system... just shifts implementation*
 - OR
 - *Simplifying our business model*
 - Simplify rate schedule calculations
 - Standardize contracts
 - Reduce number of products
 - Reduce number of unique rates
- Alternatively, **further automation** increases the complexity of the billing system but **would reduce the burden of manual charge calculations**

Summary

- Billing system complexity is driven by:
 - Core agency values
 - BPA-specific requirements
- Hundreds of charge codes are needed for each customer
- Many off-the-shelf billing systems are created for retail utilities, $\text{kwh} \times \text{rate} = \text{charge}$.
- In order to support BPA business requirements and obligations we have to be prepared to allow for billing system customization.

Questions?



Appendix



Next Steps

- Capco consultant's Assessment Executive Briefing 04/05.
- Alternatives and recommended course of action mid-April.
- Continue to work on production bugs.

Sample Bill: TRN PNGC

TRANSMISSION SERVICE SUMMARY			
Customer:	(b) (4)		
Bill ID:	MAY22-TRN03-10298	Bill Period:	May 2022
Issue Date:	July 28, 2022	Period Ending:	May 31, 2022
(b)(4)			

CUSTOMER LOAD REPORT			
Customer:	(b) (4)		
Bill ID:	MAY22-TRN03-10298	Bill Period:	May 2022
Issue Date:	July 28, 2022	Period Ending:	May 31, 2022
(b)(4)			

PNGC "JOE" Bill Supplemental Reports Example

<https://portal.bud.bpa.gov/orgs/PMO/CBC/Shared%20Documents/Business%20Analysis/Requirements/Snowflakes/Sample%20Bills/May22-TRN03-10298.pdf>

Why do we have so many bill types?

- Bill types are determined by business line and contracts
- Bill types can contain multiple contracts if they share the same business line and due dates
 1. Power and Transmission bills have to be separate for revenue purposes
 2. Contracts have a variety of different due dates
 3. Other reasons **Group Bill Types by Power and transmission**

PGE's Bill Types	Contract Due Date	Separate bill type reason
Transmission	Net 20	1- Same due date as Power, but different business line
Power	Net 20	1-Same due date as Transmission, but different business line
DSB	Net 45	2- Different due date
FIB	Net 30	2- Different due date
WSP	20 th of the month or 10 days from invoice date, whichever is later (if issued after the 10 th)	2- Different due date
EIM	Net 20	3. Different animal

Interpreting Contracts into Calculations

- Power: 703 pages
 - CBC Power Billing Calculations (2007)
- Transmission: 623 pages
 - CBC Transmission Billing Calculations (2007)
 - Operating Reserves calculations are in Pages 186-213
 - BAL-002 further complicated Operating Reserves calculations
 - Original ESS Requirements

EXHIBIT C, REVISION NO. 1 ANCILLARY SERVICE CHARGES

This Exhibit C, Revision No. 1 (Revision) replaces Exhibit C in its entirety and updates the Ancillary Services provided under this Service Agreement to correspond with those identified in the Transmission Provider's Ancillary and Control Area Services Rate Schedule and Open Access Transmission Tariff.

This Revision is subject to the Ancillary Service Rate Schedule, or its successor, in effect at the time of service.

		Provided By	Contract No.
1.	SCHEDULING, SYSTEM CONTROL AND DISPATCH SERVICE	Transmission Provider – As Applicable ¹	07TX-12496
2.	REACTIVE SUPPLY AND VOLTAGE CONTROL FROM GENERATION OR OTHER SOURCES SERVICE	Transmission Provider – As Applicable ¹	07TX-12496
3.	REGULATION & FREQUENCY RESPONSE SERVICE	Transmission Provider – As Applicable ¹	07TX-12496
4.	ENERGY IMBALANCE SERVICE	Transmission Provider – As Applicable ¹	07TX-12496
5.	OPERATING RESERVE – SPINNING RESERVE SERVICE	Transmission Provider ¹	07TX-12496
6.	OPERATING RESERVE – SUPPLEMENTAL RESERVE SERVICE	Transmission Provider ¹	07TX-12496

Multiple contracts, exhibits & updates

Contract > Back to last search

09PB-13066 (Executed) ☆



Configurations Where Used

Customers (1)

[Lower Valley Energy, Inc.](#)

Contract Documents

Type: All (3) ▼

No match

09PB-13066 (PDF)

 09PB-13066_CT_Image.pdf ⁰

09PB-13066 (PDF)

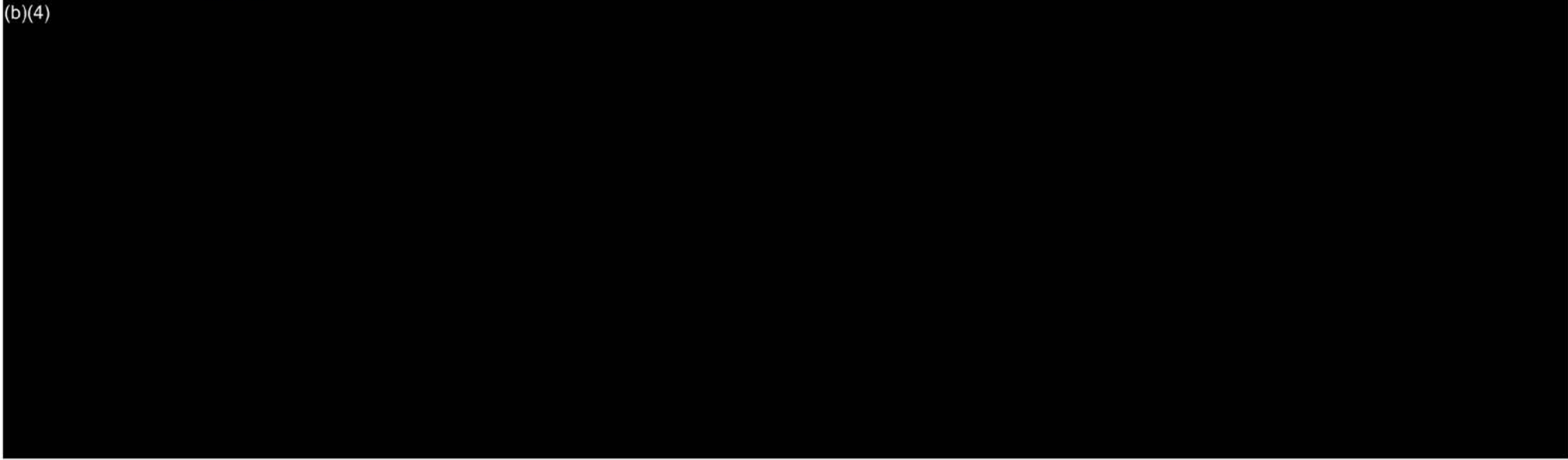
 09PB-13066_CT_PDF.pdf ⁰

09PB-13066 (Word)

 09PB-13066_CT_Word.doc ⁰

Contract: 09PB-13066 Status: **Executed** :Authenticated System Number: 31704

(b)(4)



Billing Determinant Algorithm Example: PTP NF Credits for RATS Line

Charge Description:

(provide a short, easy-to-read description for what the billing determinant is used for)

This Billing Determinant is to charge Transmission Customers taking Point-to-Point (PTP) Transmission Service on the network. PTP customers are not charged twice when forced to reserve the same capacity twice on the Network for one transaction. This applies for PTP schedules that use both the Main Network and the NW AC Intertie (formerly the RATS line).

PTP-16 Billing Determinant from the [Transmission Rate Schedule](#) and the Procedure / Policy T-16

PTP NF CREDITS FOR RATS LINE = (PTP NF CREDITS FOR RATS LINE Service Amount) * PTP NF CREDITS FOR RATS LINE Rate

Within BPA the line from Malin to Hilltop to Warner is often called the RATS line, but it is the line to the Reno Alturas line. It is now referred to as the NW AC Intertie. The reservations are those from Malin 230 to Hilltop 345 and those from Hilltop 345 to Malin 230.

If the customer uses the same service, in the same direction, on the Main Network and the NW AC Intertie there is to be one charge for the service because the NW AC Intertie is part of the Network segment. Thus, if the customer uses firm service on both legs or if the customer uses non-firm service on both legs, an adjustment is needed to avoid charging twice. But, there are two charges (one for each service) if the customer uses firm service on one leg and non-firm service on the other leg.

https://portal.bud.bpa.gov/orgs/cust-sppt-svcs/KSB_Customer_Billing/Lists/Billing%20Determinants%20Attachments/492/PTP%20NF%20Credits%20for%20RATS%20Line.doc

Billing Algorithm:

PTP NF CREDITS FOR RATS LINE = (PTP NF CREDITS FOR RATS LINE Service Amount) [kWh] * PTP NF CREDITS FOR RATS LINE Rate [\$]

PTP NF CREDITS FOR RATS LINE Service Amount [kWh] = IF (PTP NF CREDITS FOR RATS LINE Service Amount [kWh] > 0)
THEN PTP Service Amount [kWh] = Sum PTP NF CREDITS FOR RATS LINE Service Amount [kWh]
ELSE [kWh] = 0

This adjustment only applies to those customers who have scheduled Network transactions on both the Main Network and the RATS line, using the same transmission service on both legs. These schedules are the RH and RA paired schedules displaying the exact same Source, Sink, TCH, and Product Codes for both the RH and RA paired schedules.

Examples: Qualifying schedules

BC <SPP [PWX,PWX] 1,78RA	BC <SPP [PWX,PWX]77,78RA
BC >SPP [PWX,PWX] 1,78RH	BC >SPP [PWX,PWX]77,78RH

SPP >BC [PWX,PWX] 1, 2RA	SPP >BC [PWX,SPP] 1, 2RA
SPP <BC [PWX,PWX] 1, 2RH	SPP <BC [PWX,SPP] 1, 2RH

These qualify because the Network TCH and product codes are the same.

Examples: Non-qualifying schedules

BC <SPP [PWX,PWX] 1,78RA	BDY <SPP [SPP,PPM] 1,78RA
BC >SPP [PWX,PWX]77,78RH	BDY >SPP [SPP,PPM]77,78RH

These do not qualify because the Network product code differs.

BDY <SPP [SCL,PPM]77,99RA	BDY <SPP [SCL,PPM] 1,99RA
BDY >SPP [SPP,PPM]77,99RH	BDY >SPP [SPP,PPM]77,99RH

These do not qualify because the Network customer differs.

Query TSAS tags with the following attributes:

PRIORITY = "(O-NX", "1-NS", "2-NH", "3-ND", "4-NW", "5-NM", "6-NN)";
CONTRACTNUMBER = CONTRACT_SHORT_ID;
PSECODE = ACRONYM;
UPCA = "SPPC";
DNCA = "SPPC";
SEGMENTTYPE = "R";
CONTRACTTYPE = "PTP";
NERCPRIORITY is nonfirm

PTP NF CREDITS FOR RATS LINE Rate [\$] = Find the PTP NF CREDITS FOR RATS LINE Rate from the associated Factor Values table



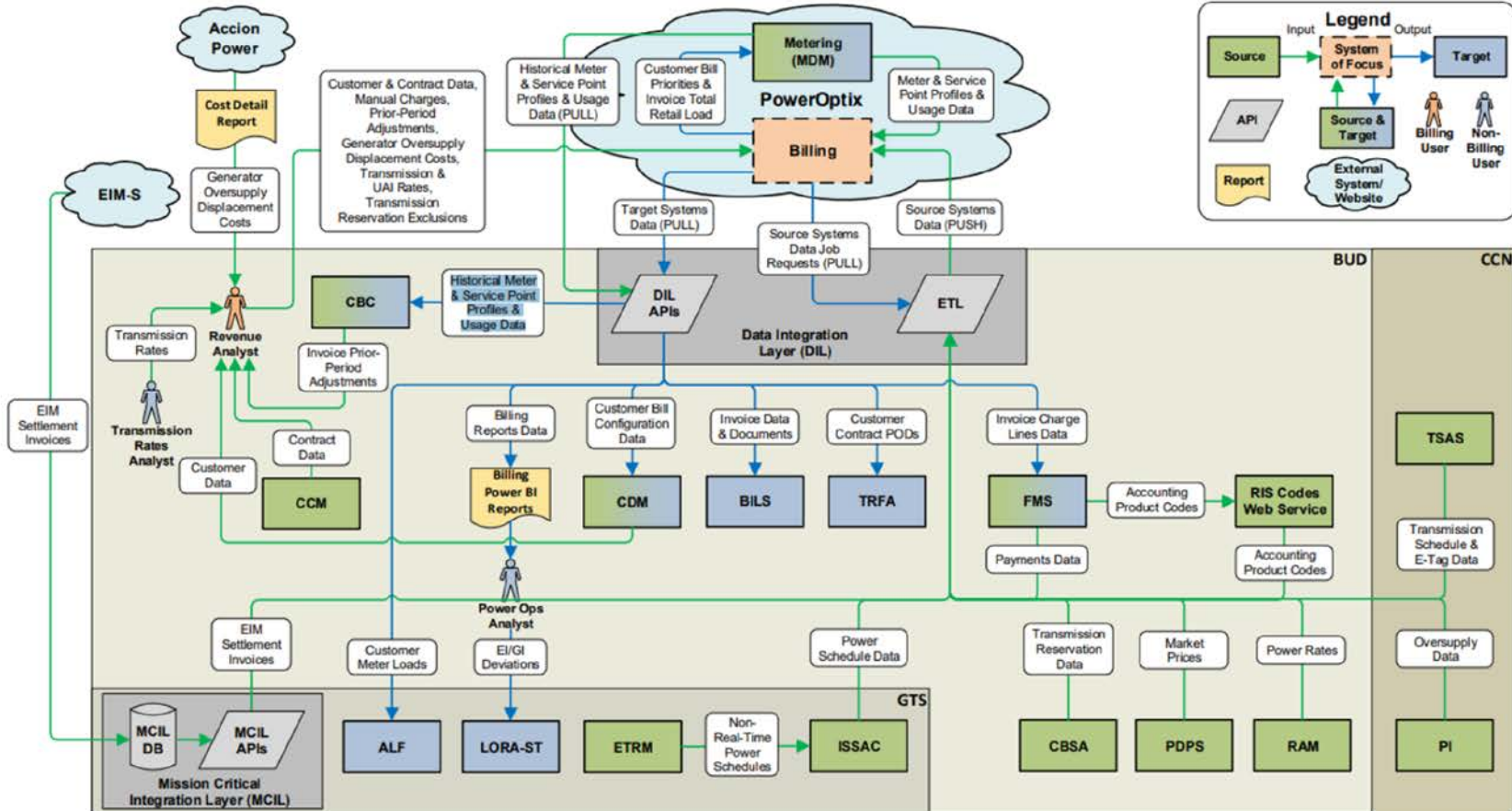
Manual Data Upload Examples

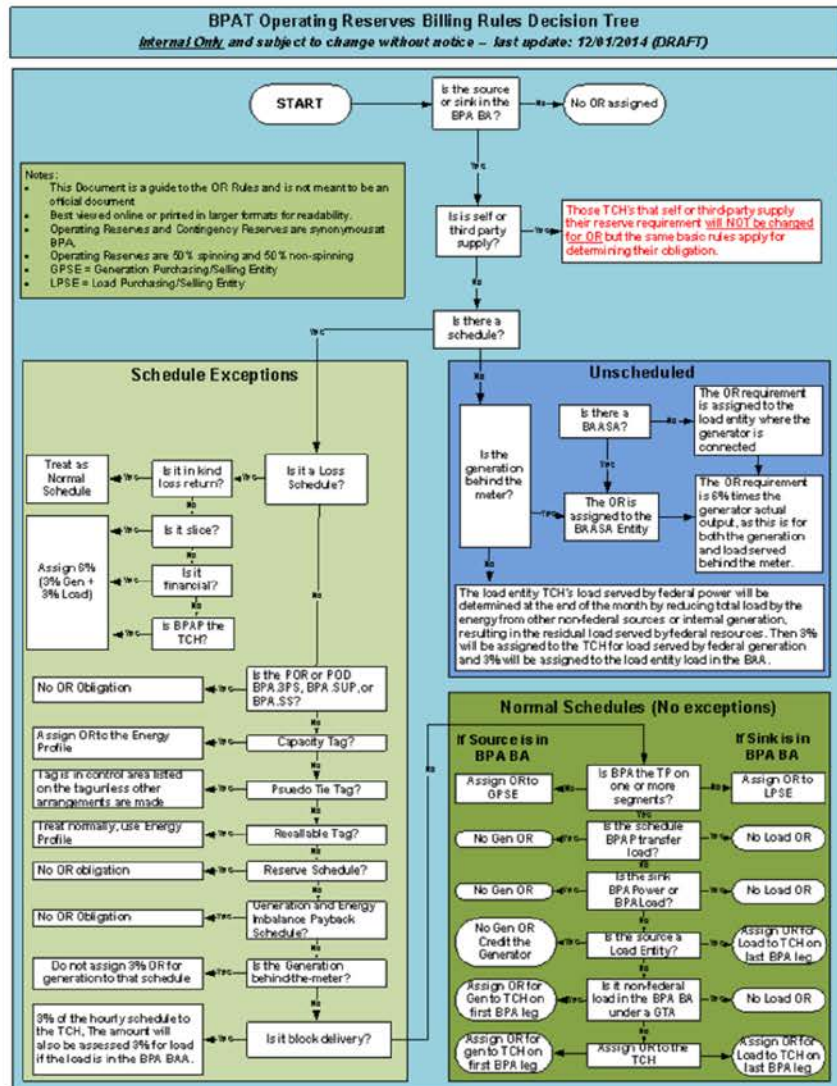
- **Transmission Rates** (Manual)
- **Customer Contract Data** (Manual, CCM)
- **Customer Data** (Manual, CDM)
- **Accounting Product Code Data** (Manual, RIS Code Web Service)
- **Cost Detail Report** Import Manual Charges (Manual)
- **Generator Oversupply Displacement Costs** (Manual)
- **Transmission & UAI Rates** (Manual)
- **Transmission Reservation Exclusions** (Manual)
- **Contract Demand Quantities (CDQ's)** – Contract item term in CBC – Information comes from Exhibit B located in CCM (spreadsheet provided by PSS)
- **Tier 2 Short Term** – Contract item term in CBC – Information comes from Exhibit C located in CCM (spreadsheet provided by PSS)
- **Tier 2 Load Growth** - Contract item term in CBC – Information comes from Exhibit C located in CCM (spreadsheet provided by PSS)
- **Irrigation Rate Discount (IRD)** – Contract item term in CBC – Information comes from Exhibit D located in CCM (spreadsheet provided by PSR)
- **Load Shaping True-up (LSTU)** – Manual Charge/credit in CBC, spreadsheet calculated and provided by PSS
- **Low Density Discount (LDD)** – Contract item term in CBC - Letter is stored in CCM, but not in an exhibit (spreadsheet provided by PSS)
- **Above Rate High Water Mark (Above RHWM)** – Contract item term in CBC - Spreadsheet provided by PSR
- **Tier One Cost Allocations (TOCA's) Percentage, spreadsheet includes Slice and Non-Slice TOCA's** – Contract item term in CBC - Spreadsheet provided by PSS
- **Late Payment Fees** - Manual charge in CBC, spreadsheet calculated and provided by Finance FTOA
- **Yearly REC Remarketing upload** that happens in April each year

PowerOptix Billing Context Diagram

Version 1.2, 1-20-2023

Contributors: Pete Phelon





Year	2005	2010	2015	2020	2022
E-tag Volume	492,676	1,243,386	1,892,910	2,769,203	3,275,916

Tag Status	BPAT Status	start	stop	Creation Time
IMPLEMENTED	ACTIVE_APPROVED	7/2/2022 9:00:00 PM	7/2/2022 10:00:00 PM	7/2/2022 7:43:04 PM
DYNAMIC SCHEDULE				

Generation

GCA	UPCA	UPTP	NERC Source	NERC Source PSE	Market Product Code
BPAT	BPAT		BPAT.EIM	BPAT	G-F

Transmission Segments

SE	TP	POR	POD	TCH	Priority Code	Aref	SaleRef	Ref Type
BPAT	BPAT	BPAT.EIM	BPAT.TPU	BPAT	7-F	SERVICE-NOR		
				TPWPP2	1-NS	97238956-EIM	10103	PTP
				BPAP01	1-NS	97257221-EIM	95363	PTP
TPWR	TPWT	BPAT.TPU	TPWR.SYS	TPW1	0-NX	EIM_BPAT_I		

Load

LCA	DNCA	DNTP	NERC Sink	NERC Sink PSE
TPWR	TPWR	TPWT	TPWR_EIM	TPWPP2

Assignments

Grp	Account	Title	Assignment Source
2	854991	BPAT>TPWR(EIM, J3U,	LEARNED:AUTO
3	854991	BPAT>TPWR(EIM, J3U,	LEARNED:AUTO

Candidates

Grp	Account	Title	Type
2	854991	BPAT>TPWR(EIM, J3U,	LEARNED Assign Account
3	854991	BPAT>TPWR(EIM, J3U,	LEARNED Assign Account

Energy Profile

Start	Stop	MW
7/2/2022 9:00:00 PM	7/2/2022 10:00:00 PM	102

Group Profile

Date	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	h2d
Group: 2 Acct: 854991	BPAT.EIM BPAT.TPU 1-NS 97238956-EIM																								
7/2/2022																						39			
Group: 3 Acct: 854991	BPAT.EIM BPAT.TPU 1-NS 97257221-EIM																								
7/2/2022																						63			

Glossary of Terms

GRID Modernization 

BTO – Business Transformation Office

CBC - Customer Billing Center (CBC) Replacement

DSB – Down Stream Benefits

EIM – Energy Imbalance Market

F – Finance

IDID – Identify, Define, Integrate, Deliver

IT – Information Technology

JLP – IT Project Management

KS – Customer Services

KSB – Customer Billing

KSBP – Customer Billing Portland

KSBV – customer Billing

Vancouver

KSM – Customer Metering Services

TSRE – EIM Settlements

WSP – Western System Power Pool

Glossary of Terms – Bill Definitions

GRID Modernization

NT – Tr: Transmission Network Requirements

PAC – PWR: PacifiCorp Power

PAC – TRN: PacifiCorp Transmission

PAT: Power & Transmission combined bills

PCM: Preemption Competition

PNGC – PWR: Pacific NW Generating Cooperative Power

PTP Transmission: Transmission Point to Point

PWR - Block / Slice-Block: Power Slice and Block

PWR-LF: Power Load Following

Transmission's Short Distance Discount (SDD)

Expansion Challenges



Pre-decisional. For Discussion Purposes Only.

SDD Definition

- SDD is a reduction of the transmission charge for Point-to-Point (PTP) and Network Integration (NT) products which have long-term use (12 months or more) of the BPA Transmission facilities for a distance of less than 75 circuit miles
- SDD is a BPA construct, not an OATT pro-forma

SDD Equations

▪ PTP:

$$\bullet 0.6 + \left(\frac{x}{75}\right)(0.4) = \text{Short Distance Discount}$$

x = circuit miles

▸ NT:

$$\text{Avg. Generation of the DNR SD during HLH} \times \text{NT Rate} \times \frac{75 - \text{Tx Distance}}{75} \times 0.4$$

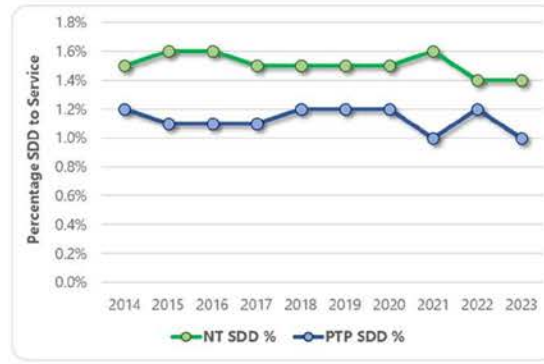
SDD Disqualifiers

- PTP:
 - During Review
 - The POR (source) is BPA Power/FCRPS
 - The reservation is under 12 months
 - POD and POR miles are 75 miles or over
 - After SDD eligibility is determined
 - The reservation is redirected in the short term
 - The reservation is redirected in the long term, and the new long-term reservation does not pass the criteria for SDD eligibility
- NT:
 - During Review
 - The network resource in the customer's NT Service Agreement is under 12 months
 - Uses FCRTS facilities for more than 75 miles or over
 - The resource is undesignated
 - After SDD eligibility is determined
 - A Designated Network Resource (DNR) that is a system sale (the DNR is not associated with a specific generating resource)

Why SDD Was Created

- The PTP SDD, when applied to original, long-term reservations, is intended to dissuade customers from building around BPA's transmission system rather than pay BPA for that short distance service.
 - The PTP SDD in its current form was adopted in the 1996 joint Power and Transmission rate case. SDD eligibility clarification language was added during the BP-22 Rates process to the Rate Schedule and Redirect of Transmission Service Business practice.
- The SDD product was expanded to NT in BP-12. Rationale was for incentivizing the location of generation close to load.
 - NT SDD was set forth in the BP-12 rate case Record of Decision. BP-12-A-02. In BP-18, the rate schedule was updated, but there was no change in the rationale.

SDD Percentage Trend



Pre-decisional. For Discussion Purposes Only.

Customer Expansion Proposals

- Prior PTP Proposal: Customers have asked BPA if the SDD could be prorated for the portions for which the customer redirects as opposed to invalidating the entire reservation
- Current NT Proposal: Customer inquired about expansion of NT SDD. No specific expansion suggestions were made.

PTP SDD Expansion Challenges

- Two internal systems, including the BPA billing system would have to be redone to automate pro-rata reductions of SDD
 - A billing system overhaul would be a drastic change and it would be several years before such a change could be made
 - BPA recently adopted a new billing system and SDD pro-rata complexity was not a criteria. Unsure even if wanted to adopt SDD pro-forma if a new billing system could adopt the complexity
- High volume and system-based complexity of redirects make the system overhaul difficult
 - For FY 2018 to 2020, on average there were 314,346 short term redirects per year and 28 long term redirects per year
 - For those with SDD eligibility reservations that redirected to short-term reservations, the FYs 2018 to 2020 annual average was 2,113

PTP SDD Expansion Challenges

- In both the current SDD design and in a hypothetical pro rata SDD design, the manual process for calculating the circuit-mile distance would still be necessary
 - Manual process to calculate the circuit miles distance includes eight steps
 - SDD technical reviews for an individual POD and POR combination can typically take anywhere from 10 minutes to an hour
 - Final internal review of the contract amendment can take anywhere from 1 to 30 days with most averaging 7-14 days

NT SDD Expansion Considerations

- Customers would have to make an argument that there is enough benefit to the Transmission system in locating generation close to load that a larger discount is justified.
- They would then need to make an argument that customer behavior will be influenced due to the discount.

Other Factors to Consider

- There is administrative burden in dealing with SDD
- SDD is not OATT pro-forma
- As BPA moves towards the emerging markets, BPA is moving more towards OATT pro-forma, versus going against it
- Each customer will have an effective rate impact based on their portfolio of Transmission rate products.
- Customers with SDD will see an effective reduction on their rate impact.

Agency Decision Framework Analysis (ADF)

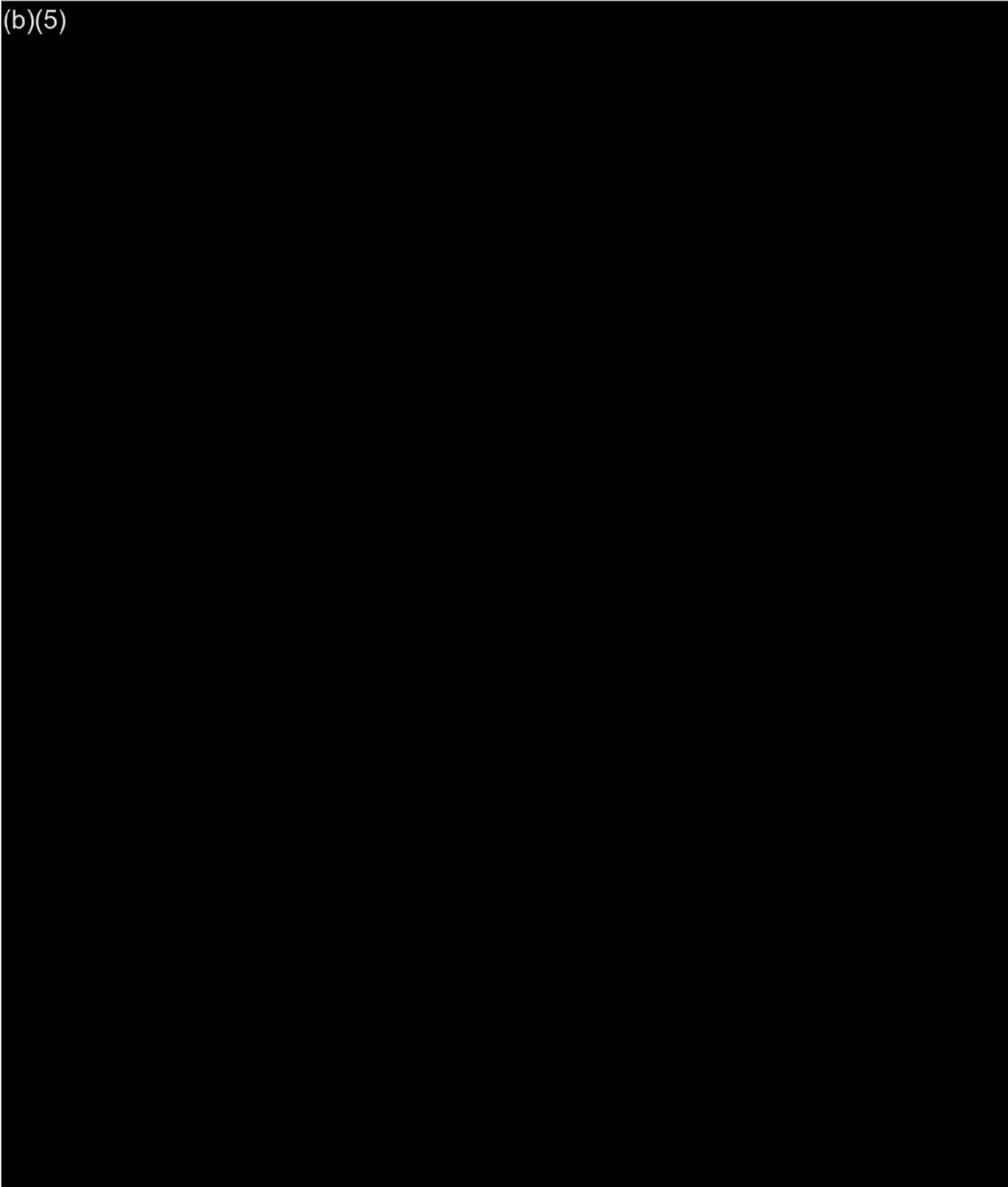
2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Topic: Short Distance Discount/ Behind-the-Meter

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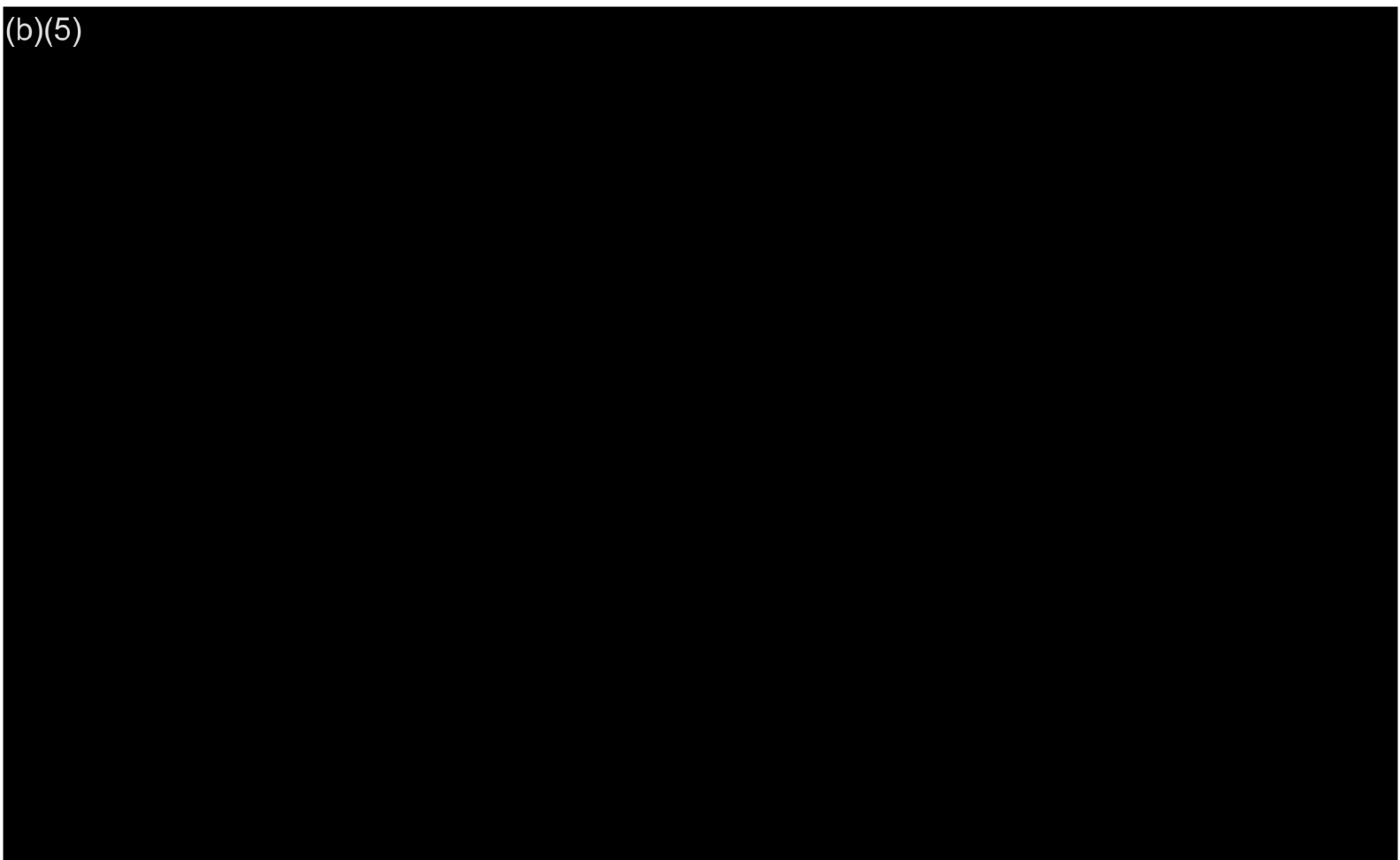
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

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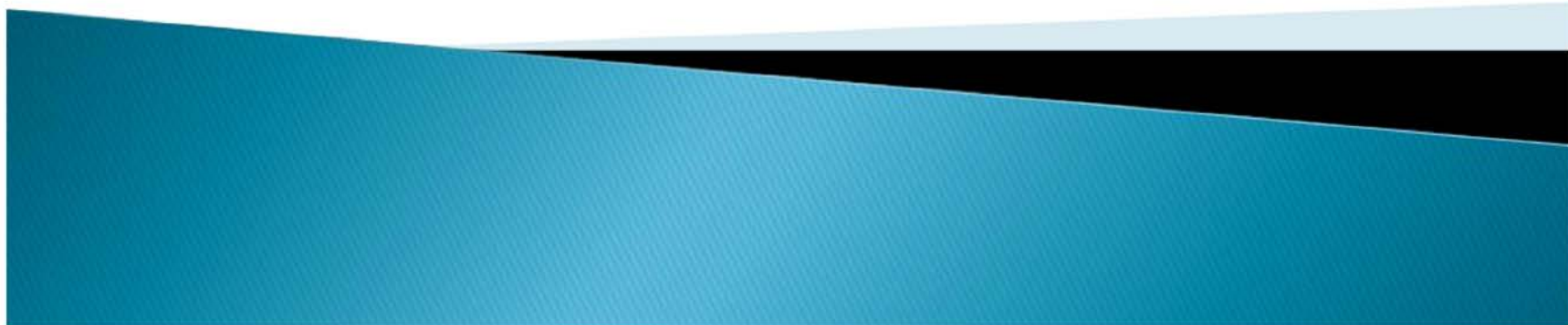


Short Distance Discounts

“SDD’s”

TSE/TSES Training
March 29, 2023

Jared Lacambra & Eric Carter



Overview

- ▶ What are Short Distance Discounts?
- ▶ Eligibility
- ▶ SDD Root Cause Analysis
- ▶ SDD process flow chart
- ▶ Mileage and discount calculation
- ▶ TPC considerations and Process
- ▶ Questions

TSE SDD Presentation 3/29/23

What is the SDD how is it applied?

- ▶ SDD is a reduction to the transmission charge for limited use of the BPA network
- ▶ SDD applies to long-term use of the FCRTS for distances less than 75 circuit miles.
- ▶ PTP and NT rate schedules address eligibility and calculation of the SDD
- ▶ The FCRTS includes facilities for which BPA TS has procured transmission rights (e.g. leases).
E.g. White-Bluffs-Stevens Drive

TSE SDD Training 3/29/23

Eligibility

- ▶ TSE/TSES decides SDD Eligibility
 - With TPC and LT input
 - Where SDD applies, TPC determines line mileage for calculation of the discount
- ▶ NT service – see NT-22 rate schedule
 - Transfer customers – SDD applies once resource is designated in NT contract (Salmon River example)
- ▶ PTP service – see PTP-22 rate schedule
 - Contiguous PODs
- ▶ Transmission Rate Schedules

Eligibility cont.

- ▶ **System Sale:** Sale to a customer, usually wholesale, from the seller's system as a whole, without identifying a specific resource as being the creator of the power being sold.
 - No SDD for System Sales
- ▶ **Short-term Redirects** – SDD is not applied. Customer loses SDD for the entire month for any portion of Reserved Capacity receiving an SDD
- ▶ **Calculated circuit miles 75+ miles**
 - No SDD if distance >74 miles
- ▶ SDD eligibility is documented in Section 7 of transmission service tables
- ▶ No SDD on interties (E.g. Turlock)
- ▶ **NT Resources**
 - No SDD until resource is designated

AE and Account Team Considerations

- ▶ The Account Specialist will double check the PTP contract when new service or renewals come up for not only SDD applicability, but to double check the source sale. If the POR (source) is BPA Power/FCRPS then SDD is not applicable. The Account Specialists will inform the CSE when SDD is not applicable before requesting CCM review.
- ▶ The Customer Account Team will discuss any SDD billing issues before applying the discount. This applies to not only SDD, but all major billing corrections.
- ▶ If SDD billing errors are identified, before correcting the error, the AE and CSE shall confirm eligibility and SDD calculation.
- ▶ Eligibility determination is made prior to CSE CCM mileage calculation – don't request mileage calculation if SDD not applicable.

TSE SDD Training 3/29/23

SDD Root Cause Analysis and Mitigation Plan 1 / 24 / 23

▶ (b)(4)

▶ (b)(4)

▶ (b)(4)

▶ Mitigation plan/training approved by Sponsors

The Equation

▶ PTP:

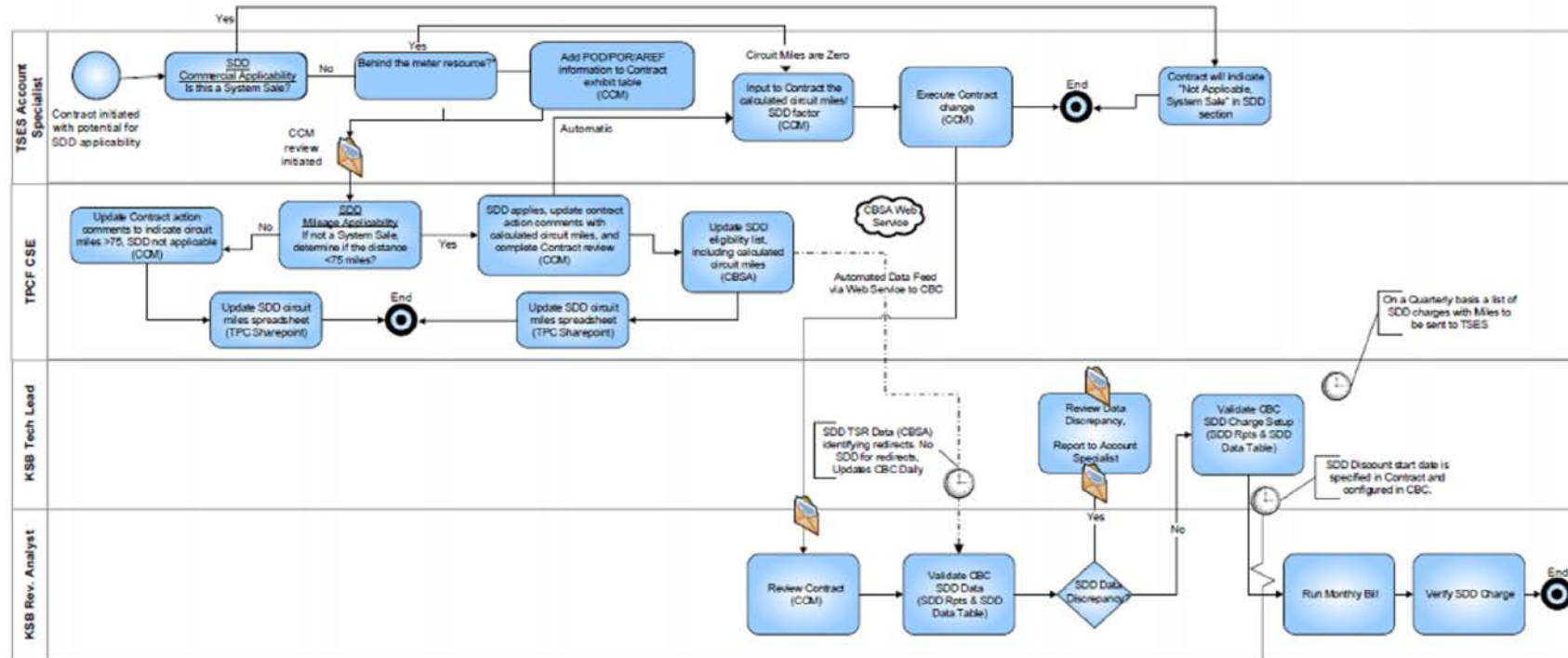
- $0.6 + \left(\frac{x}{75}\right)(0.4) = \text{Short Distance Discount}$

▶ NT:

$$\text{Avg. Generation of the DNR SD during HLH} * \text{NT Rate} * \frac{75 - \text{Tx Distance}}{75} * 0.4$$

Where x= circuit miles.

SDD Flow chart



Behind the meter resource:

A resource that is used solely to serve the NT Customer's Network Load and is internal to the NT Customer's system

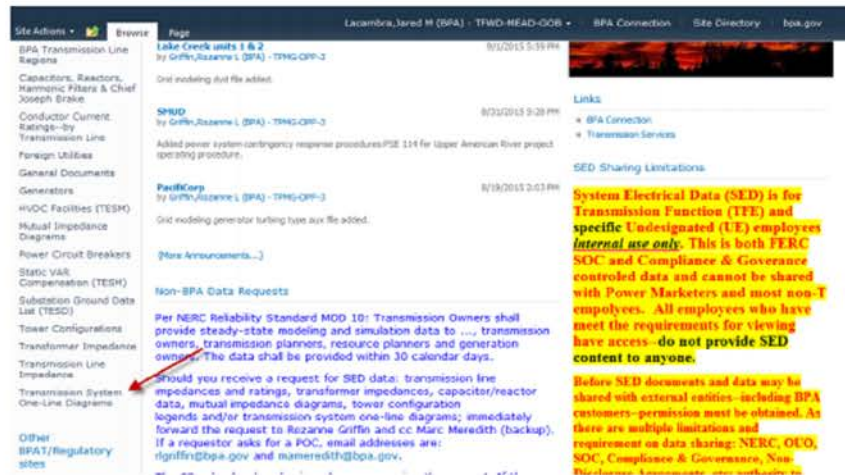
TPC Circuit mile calculation process

- ▶ First, Identify the POD and POR.
 - This is defined in the transmission contract.
- ▶ Before going any further a “high level” test can be performed in EGIS. It is a quick and easy way to see if the distance significantly exceeds 75 miles. If it does then no calculation is needed. Notify the Account Specialist.

Process: Identifying Paths from POR to POD (Method 1)

Using the Transmission One line diagram to identify possible circuit paths.

- ▶ Navigate to the [System Electrical Data SharePoint site](#)
 - This site contains all of the needed reference materials.
- ▶ Use the [Transmission System One-Line](#) for identifying possible circuit paths.

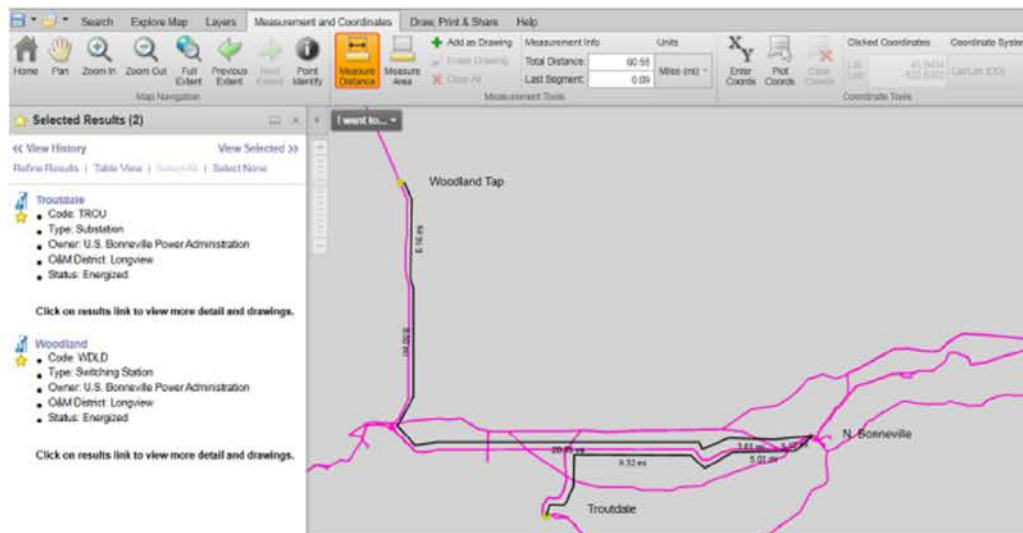


- ▶ This is strictly for determining possible circuit paths, **not obtaining the distance**.
- ▶ If the circuit path is easily identifiable as greater than 75 miles the process can stop here, as SDD's are only calculated for distances less than 75 miles.
- ▶ Keep track of the line names that are identified to be part of the circuit path; we will use them in the next step.

Process: Identifying Paths from POD to POR (Method 2)

Using EGIS to identify possible circuit paths.

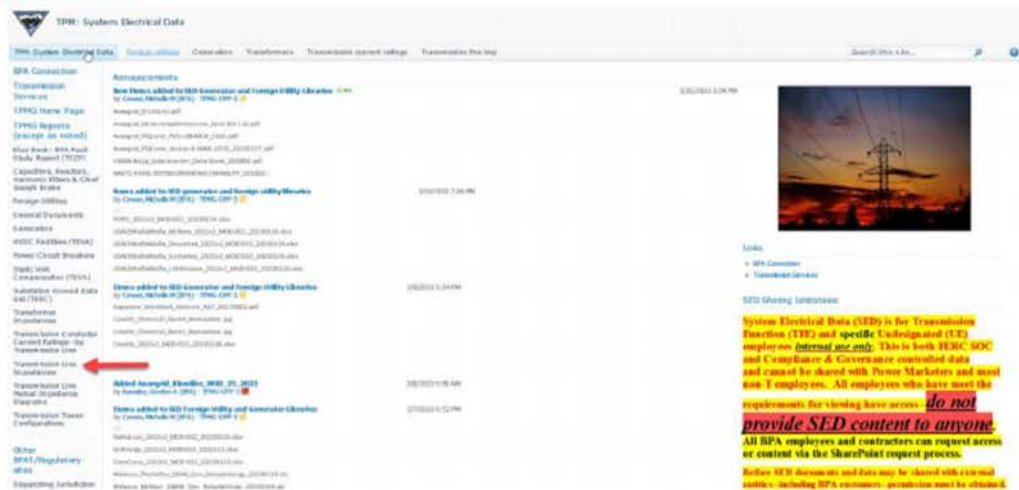
- ▶ Navigate to the [EGIS Website](#).
- ▶ EGIS has the functionality to search for lines and substations, and measure distances between two designated points, or piecewise along a circuit path.



- ▶ It can also be used to identify various circuit paths from POD to POR
- ▶ If the circuit path is easily identifiable as greater than 75 miles the process can stop here, as SDD's are only calculated for distances less than 75 miles.
- ▶ Keep track of the line names that are identified to be part of the circuit path; we will use them in the next step.

Process: Finding Actual Circuit Miles

- Once possible circuit paths have been identified, navigate to the [Transmission Line Impedance book](#)



- Use this resource to obtain the actual circuit miles of the lines that were found to make up the path between POD and POR.
- It is important to pay close attention that the total distance is the aggregate total of individual line sections. In some cases the POR or POD will only be a part of the way down the line.
- Sum the length of all the line sections making up a particular circuit path between the POR and POD.

TSE SDD Training 3/29/23

Process: NETWORK TRANSMISSION CUSTOMERS

- NT customers are eligible for an SDD if they have a resource that is using less than 75 miles of the FCRTS, including behind the meter resources connected directly to the customer's system. The method is described in the NT Rate Schedule, but in a nutshell, BPA must ensure that the amount of designated capacity from the resource allocated to any POD **may not** exceed the POD's peak load. (b)(4) example)
- In the case where the DNR capacity exceeds POD peak load; reach out to Jared or John Schaad. (b)(4) situation)
- A Designated Network Resource (DNR) that is a system sale (the DNR is not associated with a specific generating resource) does not qualify for the SDD.
- For a DNR SD directly connected to the customer's system (including, Behind the Meter Resources) or a DNR SD that does not use BPA's network facilities, the Tx Distance shall be zero. (ex: (b)(4))
- For more information go to the NT section of the [Transmission Rate Schedules](#)

Process: PTP CONTIGUOUS CUSTOMERS

- System sales do not qualify for SDD.
- Contiguous PODs qualify for SDD – the transmission distance used in the calculation shall be between the POR and the POD farthest from the POR.
- For more information go to the PTP section of the [Transmission Rate Schedules](#)
(pg. 17)

CBSA

- Once the Circuit miles have been calculated and shared with TSES during CCM review then the CSE will enter the circuit miles into [CBSA SDD Contract Rights](#).

BPA - Commercial Business Support Application (CBSA)

Production

BUD (b)(6)

[What's New 2020 R6](#)

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Customer Billing Support

Manage Short Distance Discount (SDD)

[SDD Contract Rights](#)

[SDD Eligibility](#)

TSE SDD Training 3/29/23

CBSA

- ▶ If your calculation is from an existing TSR AREF and is already in the SDD list it is entered here:

- ▶ If the calculation is new and needs to be added to the SDD list it can be looked up and entered here:

TSE SDD Training 3/29/23

Questions?

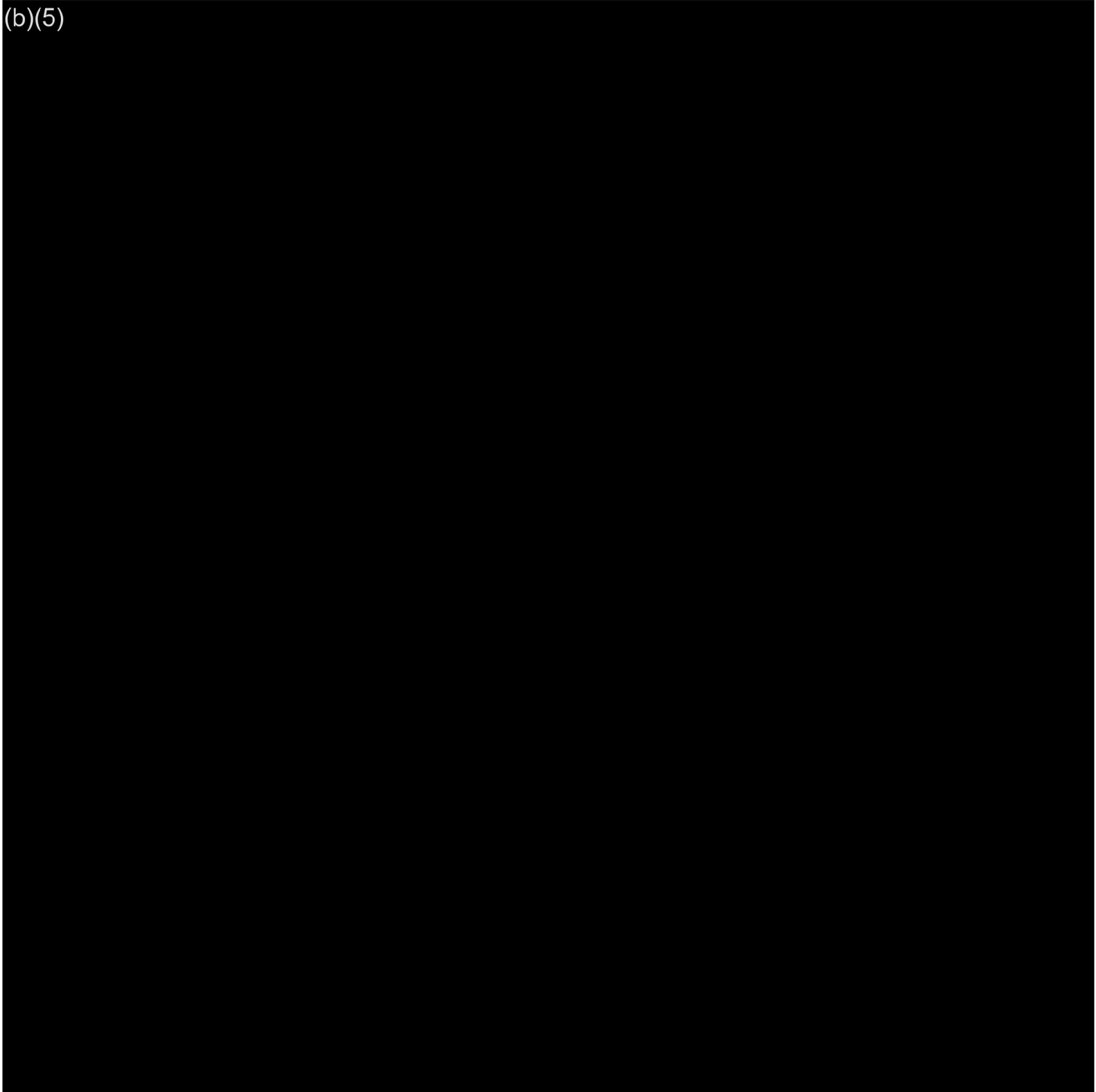


TSE SDD Training 3/29/23

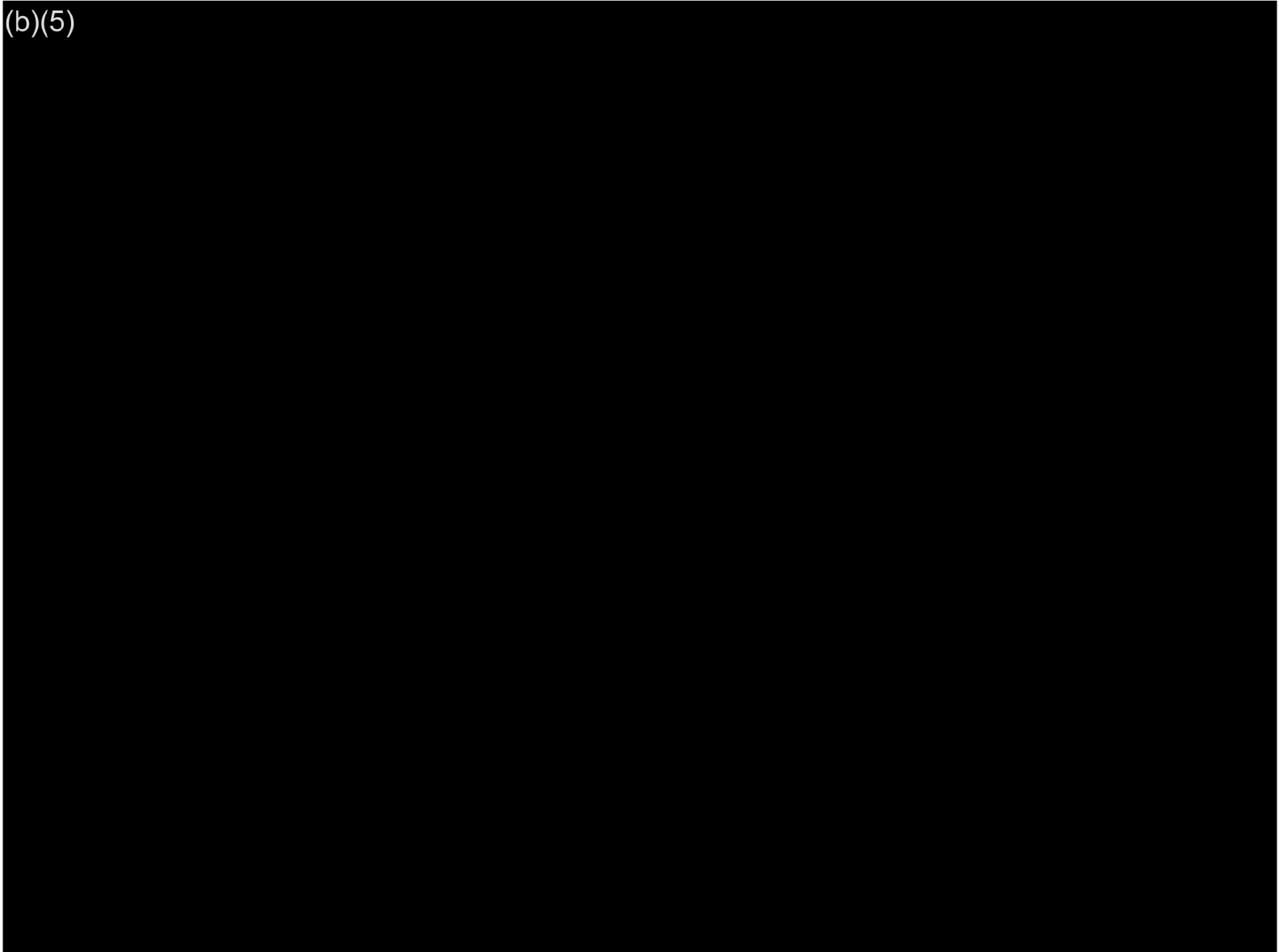
Agency Decision Framework Analysis (ADF)
2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting Notes: July 31, 2025

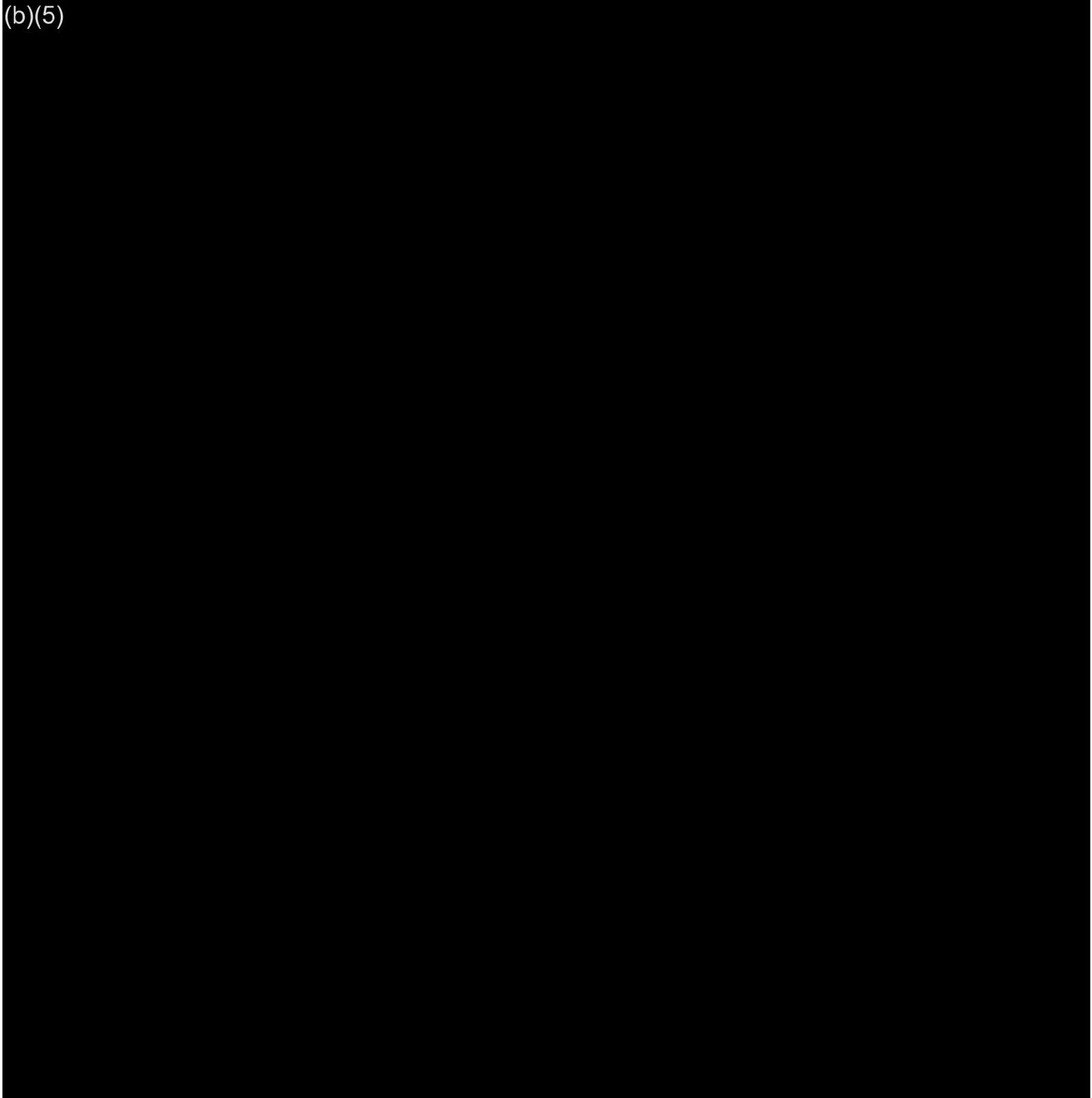
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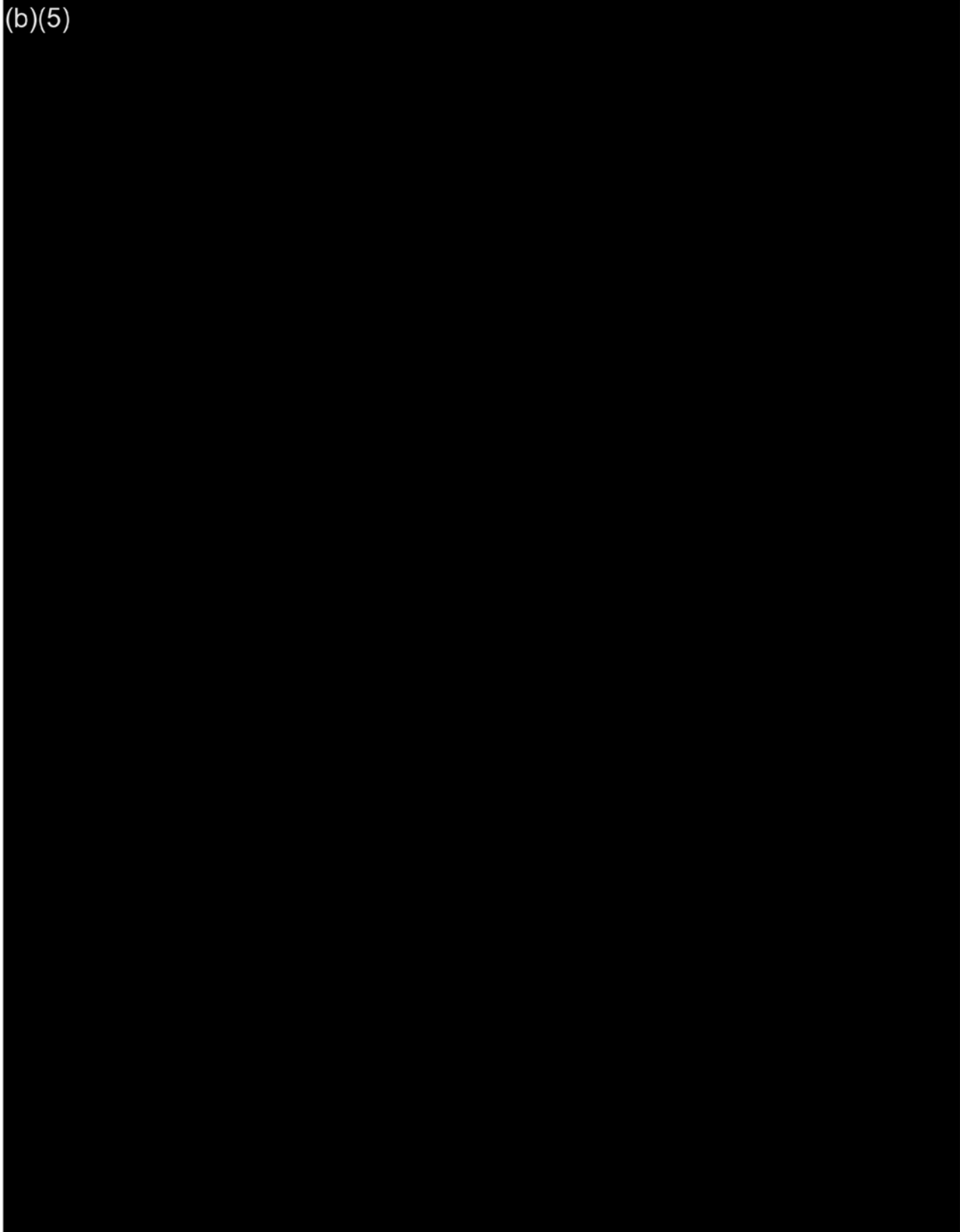
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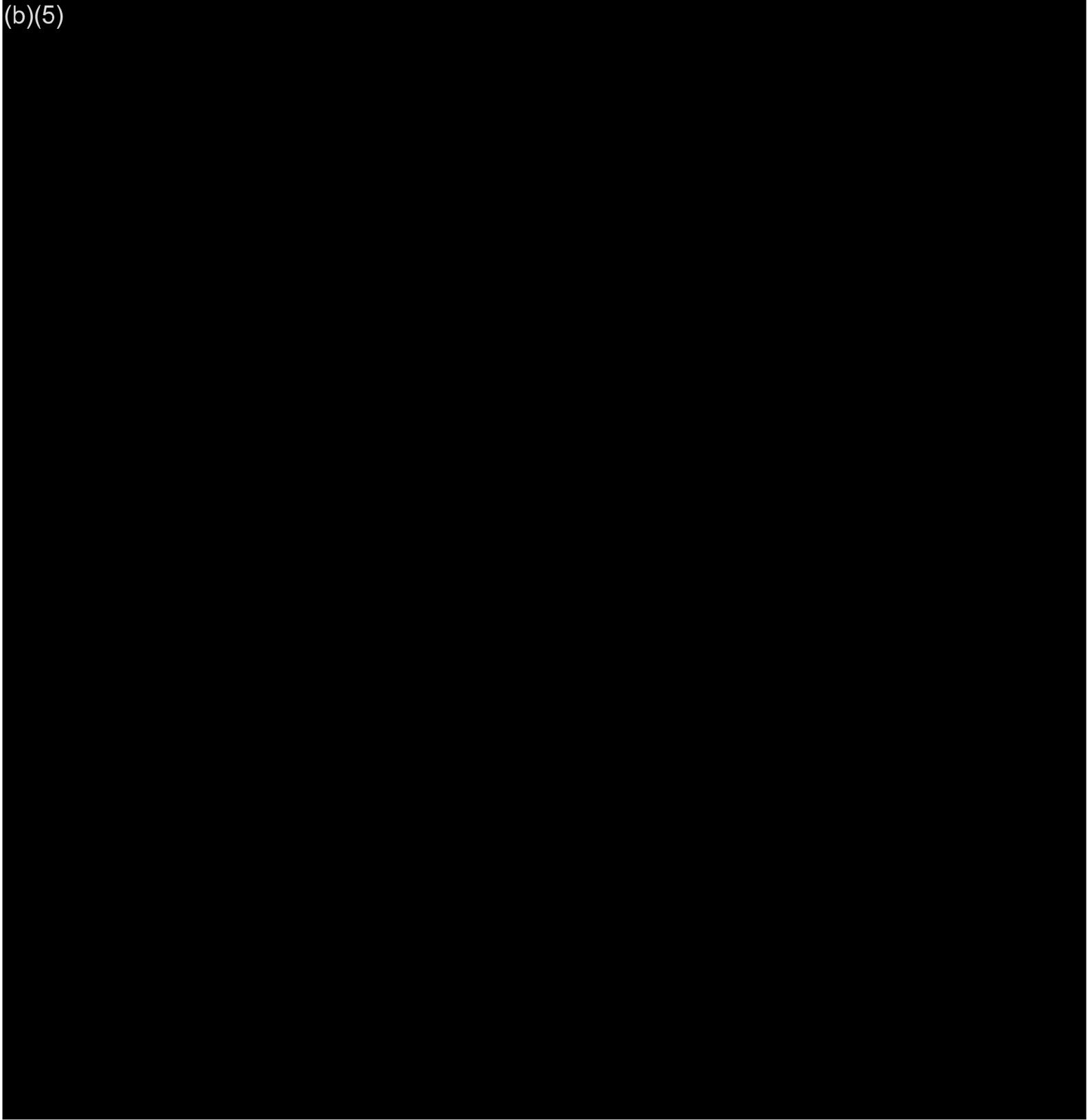
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- Brainstorm significantly different, creative, feasible alternatives to the status quo that achieve the objectives (Step 4) and mitigate risks (Step 5) based on the decision criteria.
- Narrow down the alternatives to manageable set of (at least two) alternatives.
- Ensure the alternatives are sufficiently defined and estimates based on preliminary planning assumptions.
- Test feasibility of selected alternatives with SMEs/Stakeholders as needed.

See [Additional Guidance and Resources for Step 6](#) for further assistance with this step.

7. Assess risks of alternatives

- Identify the risks associated with the alternative actions or approaches.
- Assess effectiveness of existing controls for mitigating the risks identified.
- Analyze the likelihood and consequences of each risk.
- Evaluate the risks to determine whether they are acceptable or must be mitigated.

See [Additional Guidance and Resources for Step 7](#) for assistance with scenario development and scoring/rating risks

8. Analyze & rank alternatives

- Analyze status quo and alternatives using decision criteria from Step 4.
- Rank order status quo and alternatives based on the analysis and insights.
- Based on the analysis, consider hybrid alternatives that may be more effective.
- Formulate the recommendation, explaining why the recommended alternative is the best.

See [Additional Guidance and Resources for Step 6](#) for further guidance on evaluation of alternatives.

9. Present findings & document decision

- Develop briefing package.
- Present results to the decision maker(s), including decision insights, minority opinions, and preliminary implementation plan assumptions.
- Document decision, supporting information, high level planning estimates, and performance expectations informed by decision criteria.

See also [Additional Guidance and Resources for Step 9](#).

10. Transition to implementation:

- Decision maker assigns management accountability for implementation.
- Form implementation team.
- Implementation team debriefs with ADF team.
- Management ensures that monitoring and reporting process is established.

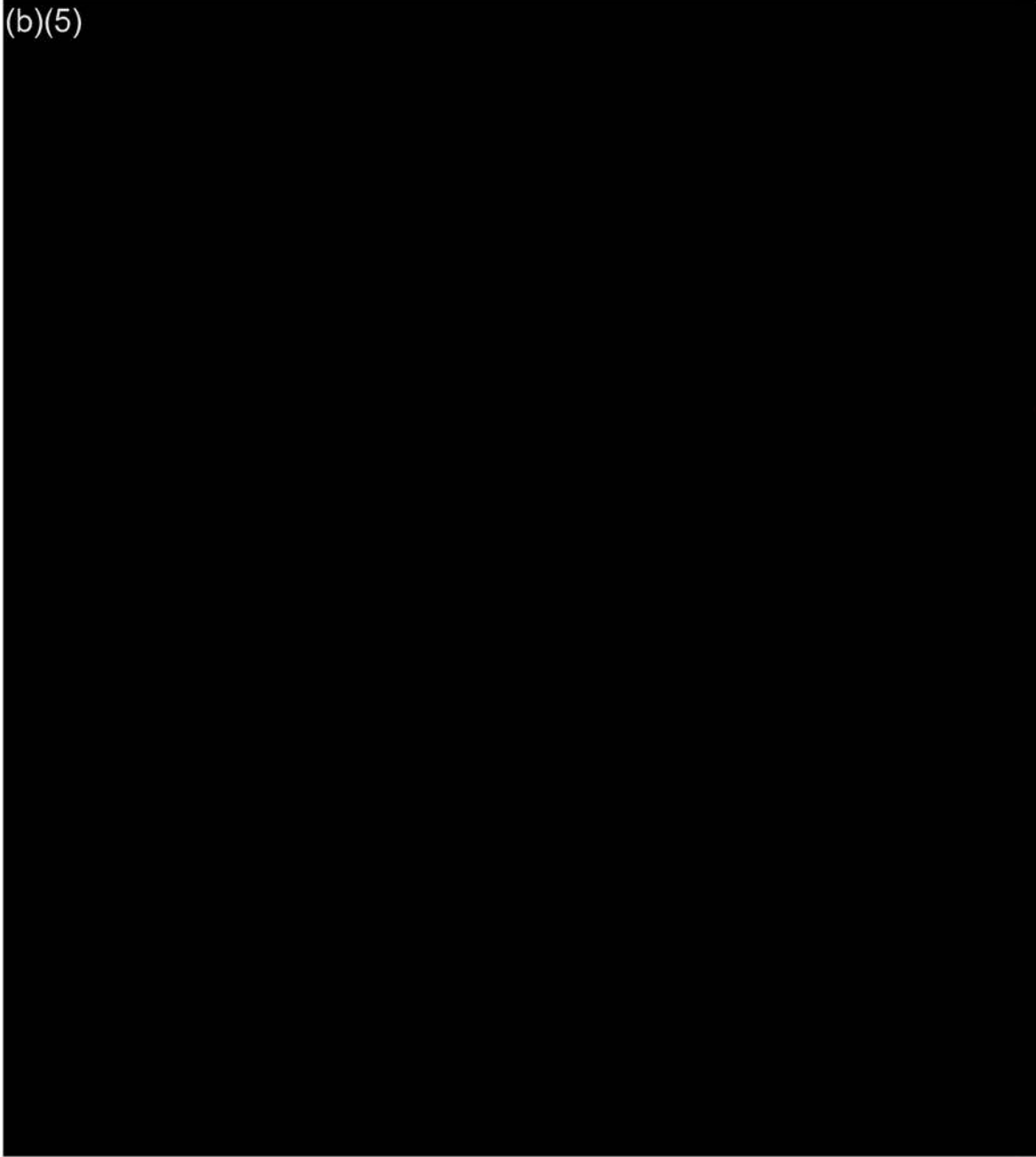
See [Additional Guidance and Resources for Step 10](#) for an implementation charter template.

Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting: August 15, 2025

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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

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Agency Decision Framework Analysis (ADF)

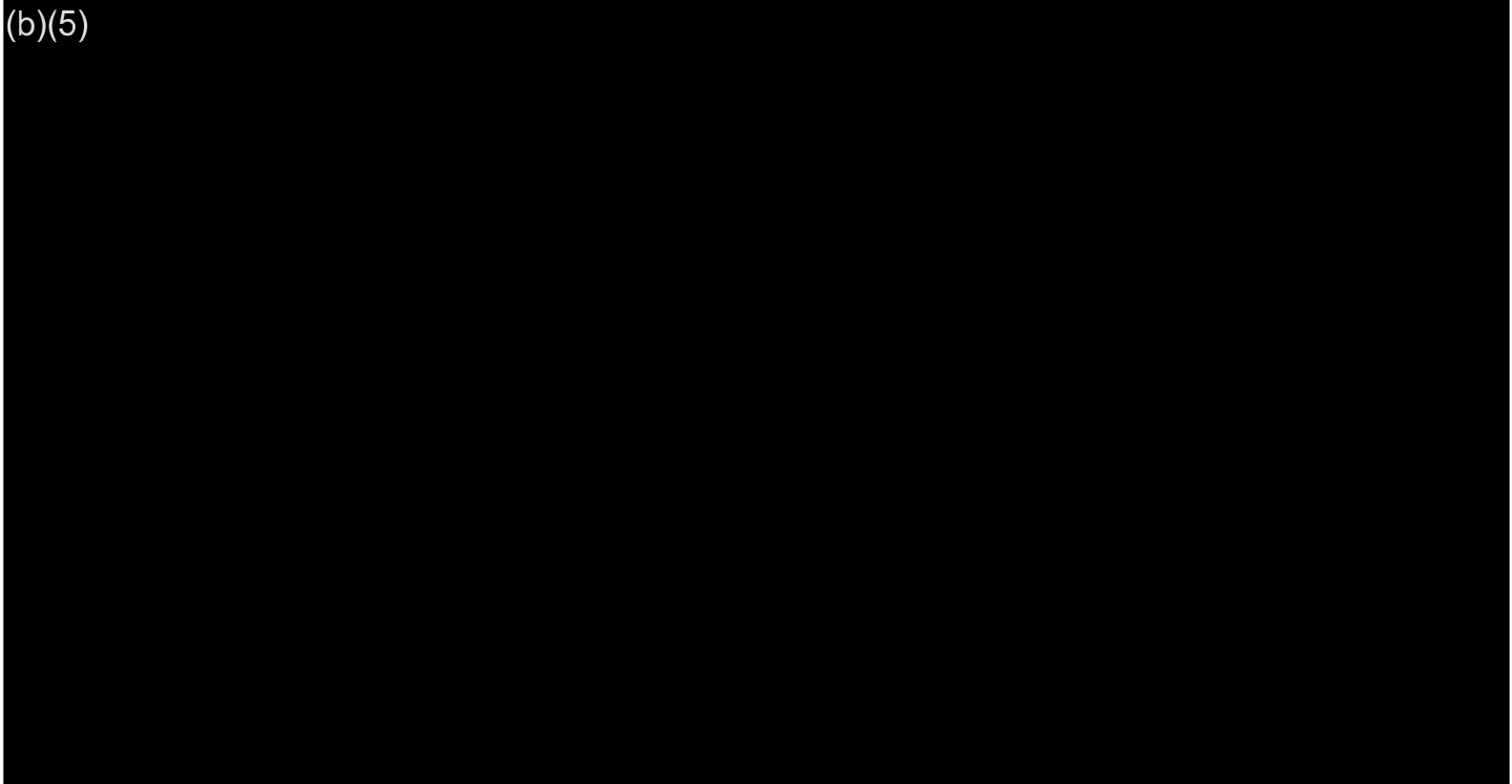
2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

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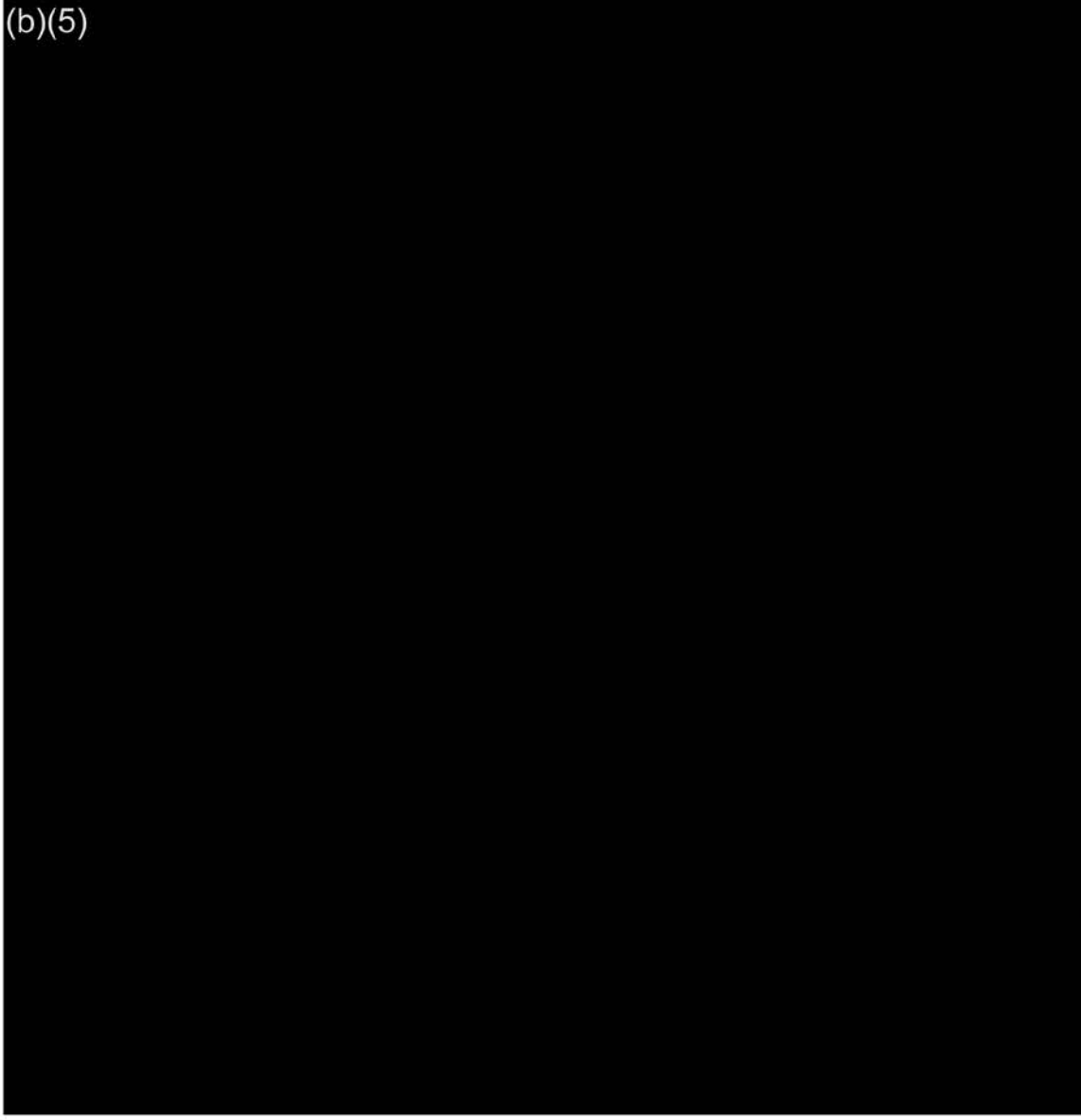


Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

(b)(5)



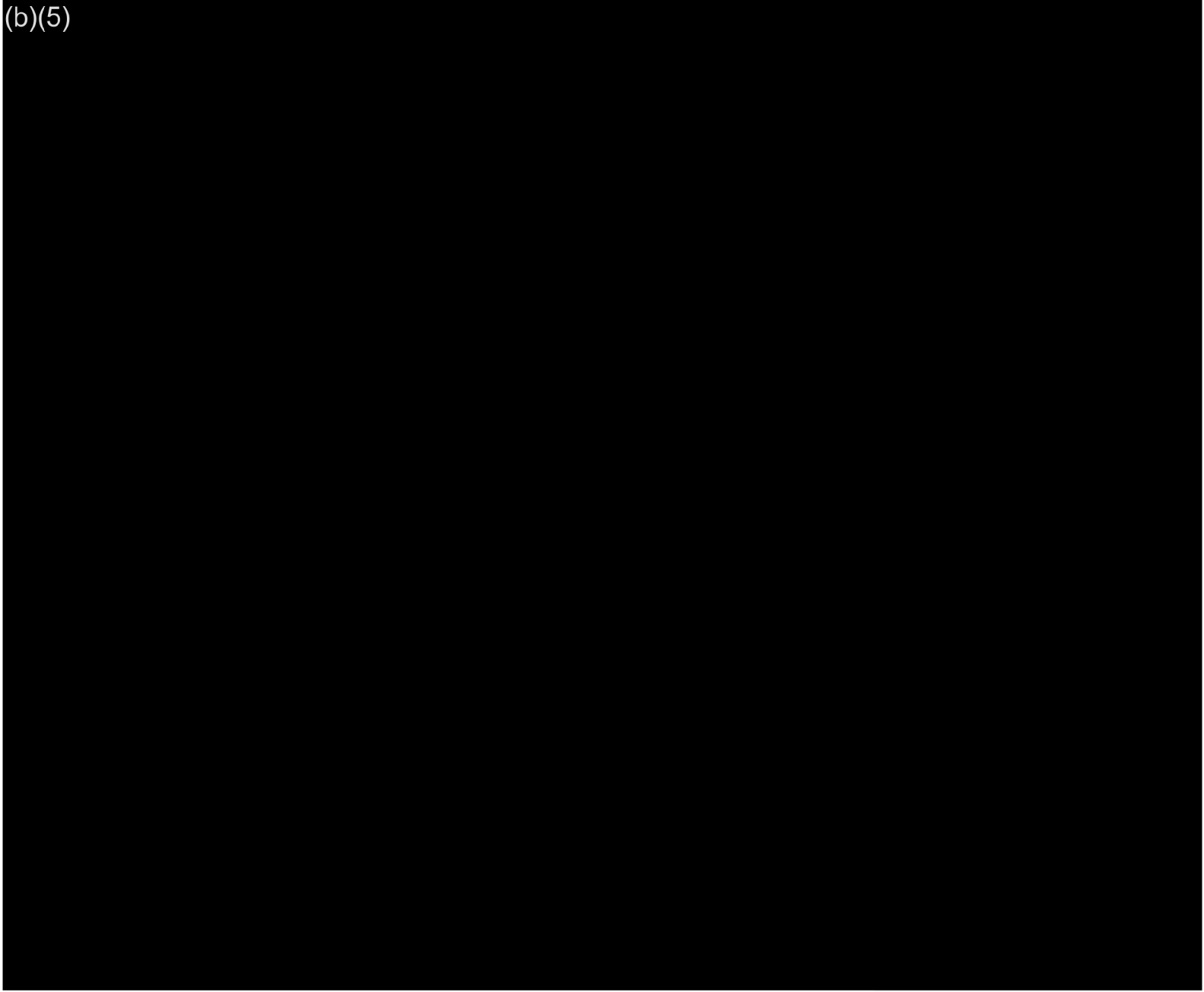
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

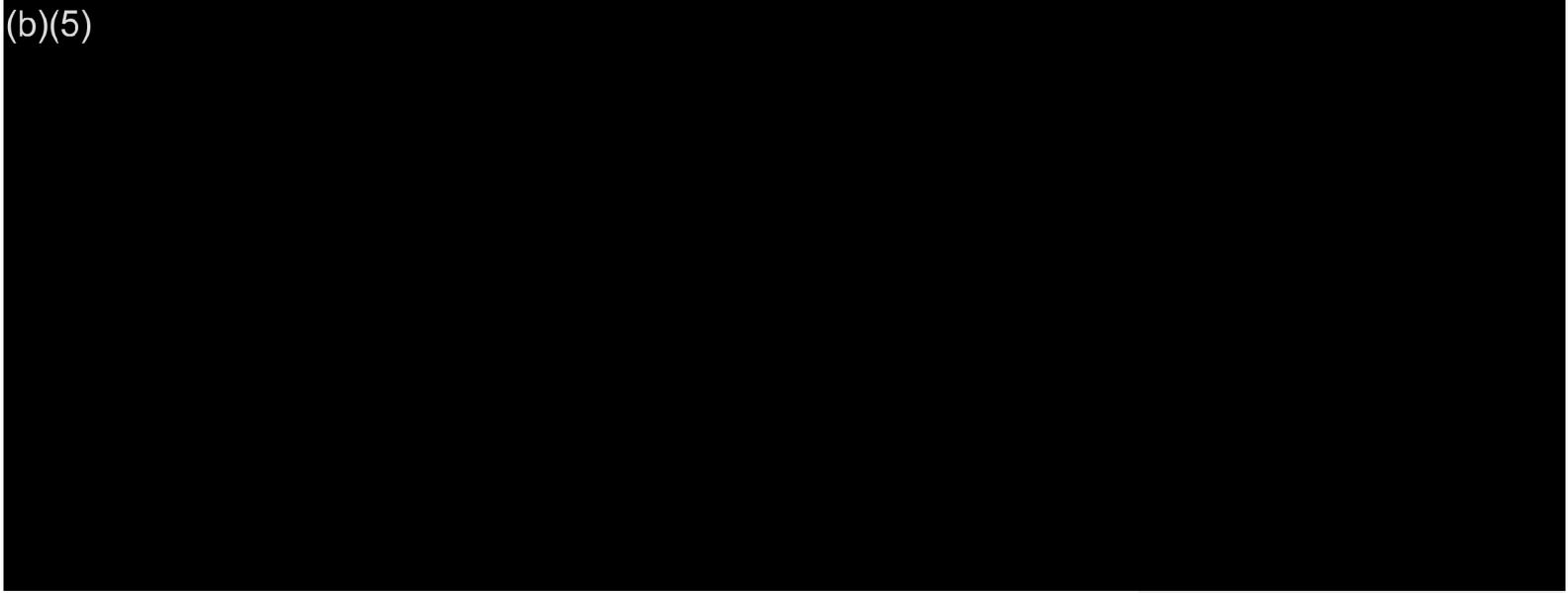
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

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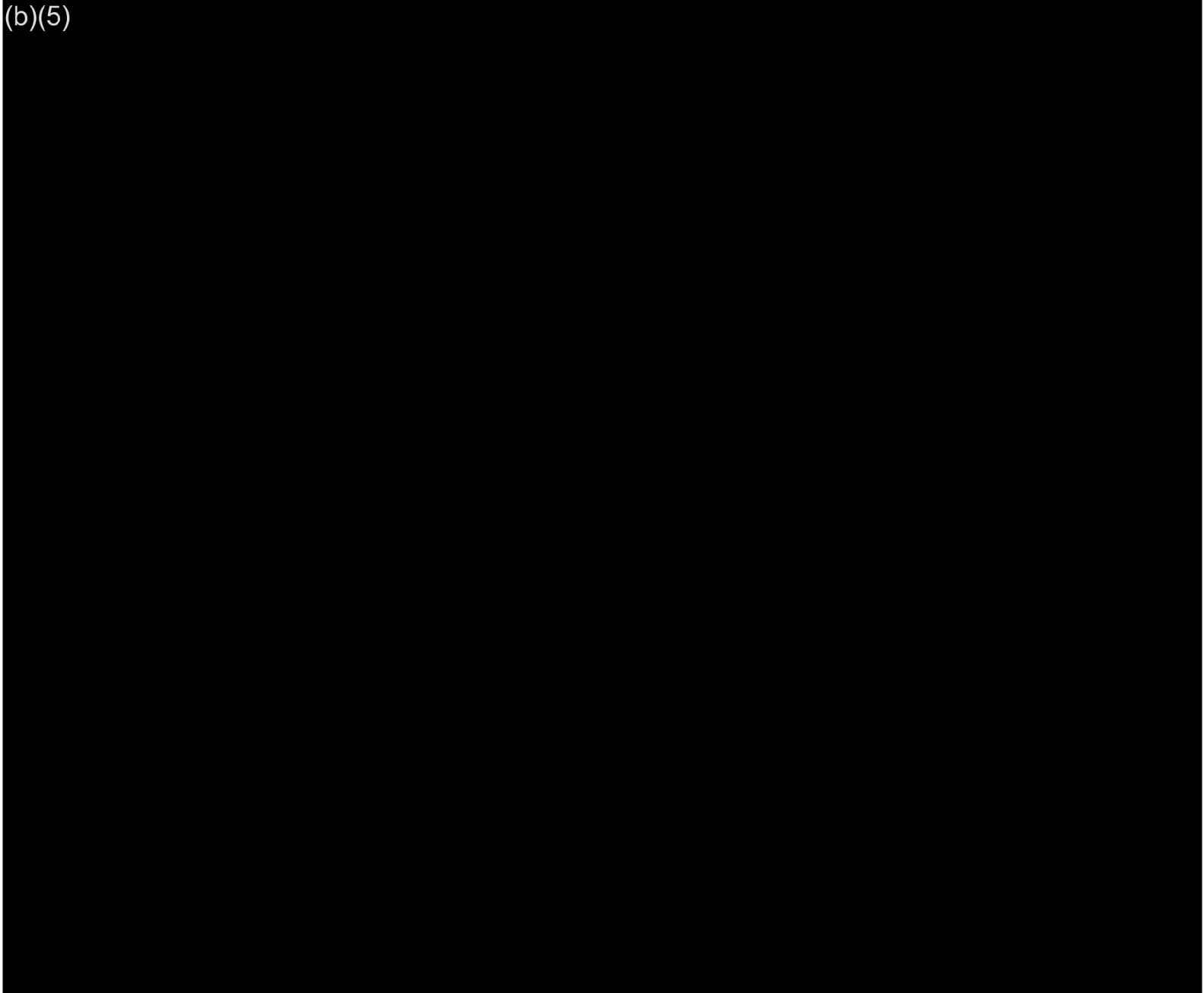


Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

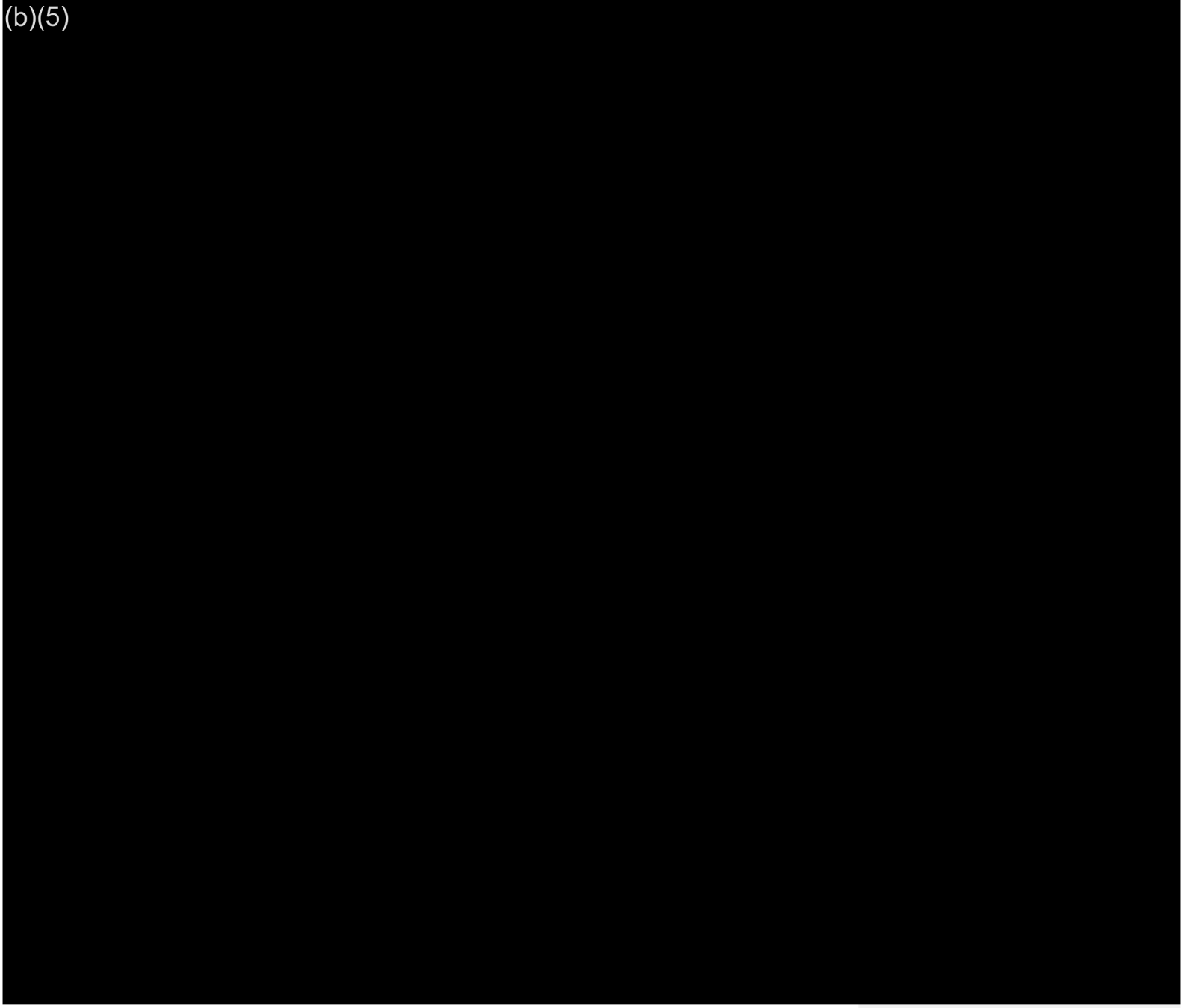
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

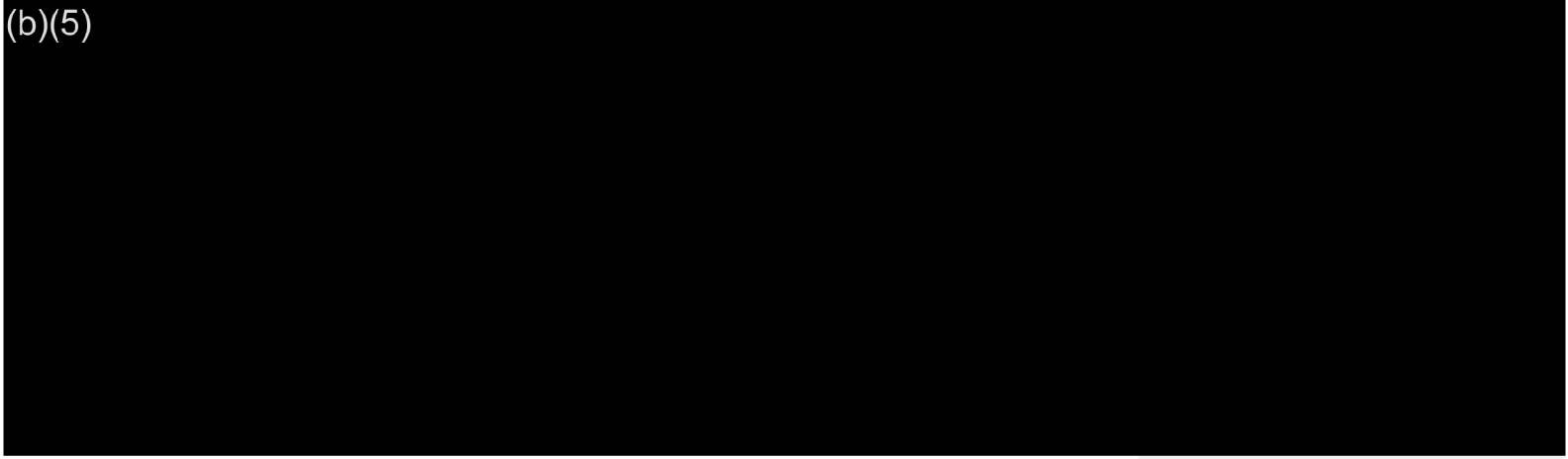
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

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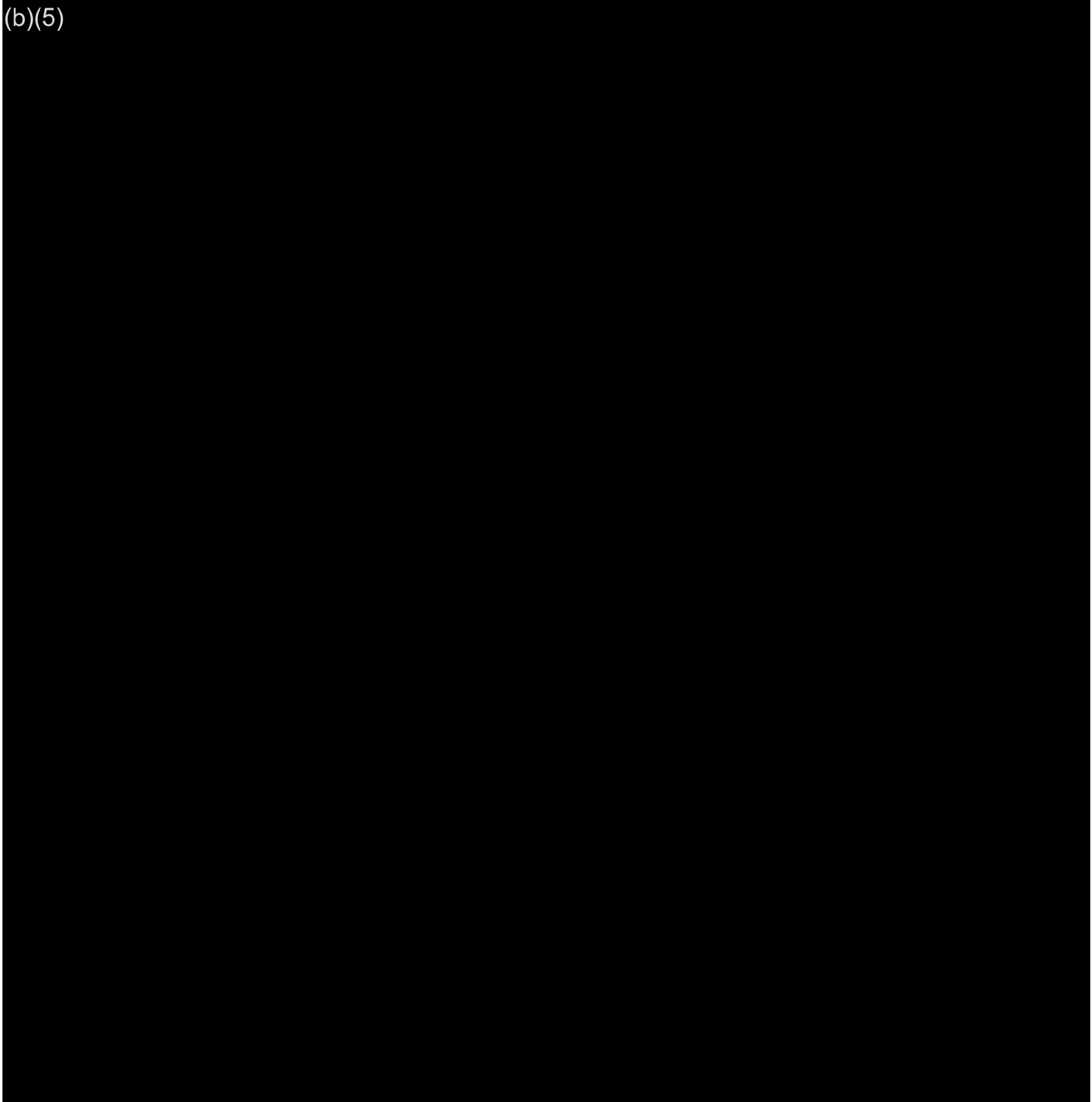


Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: September 11, 2025

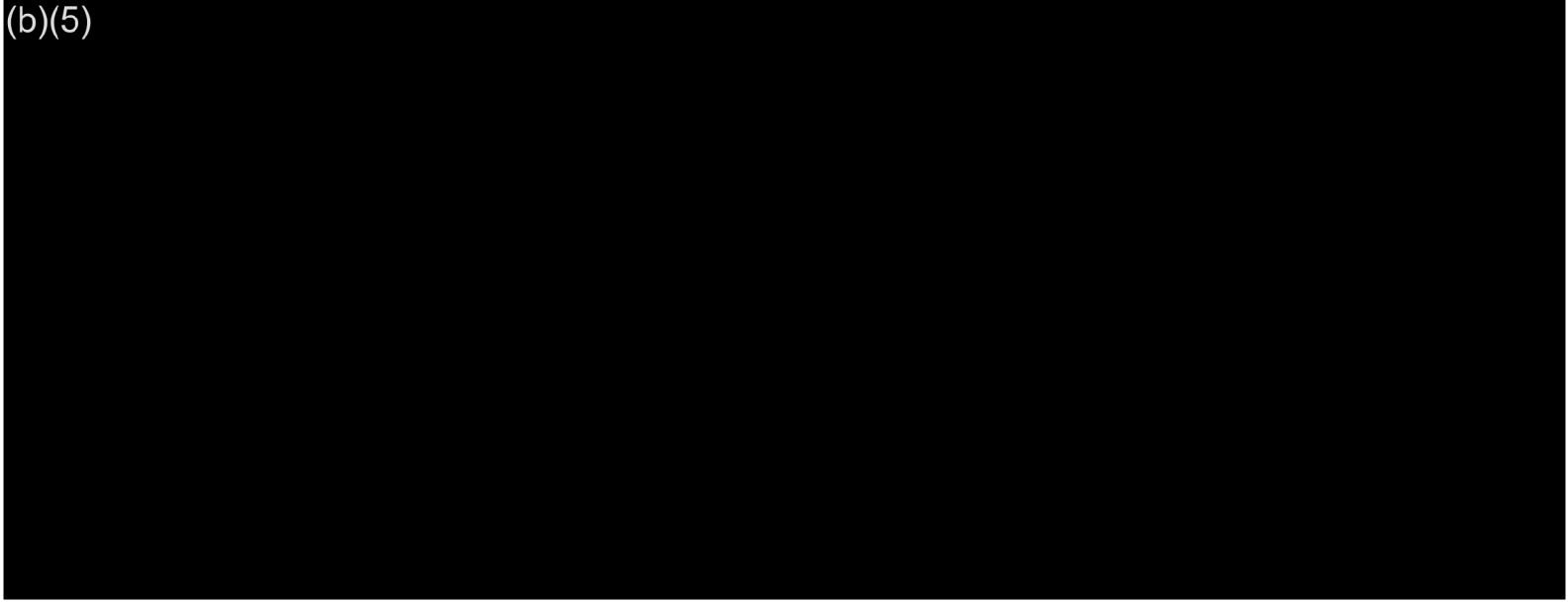
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

(b)(5)

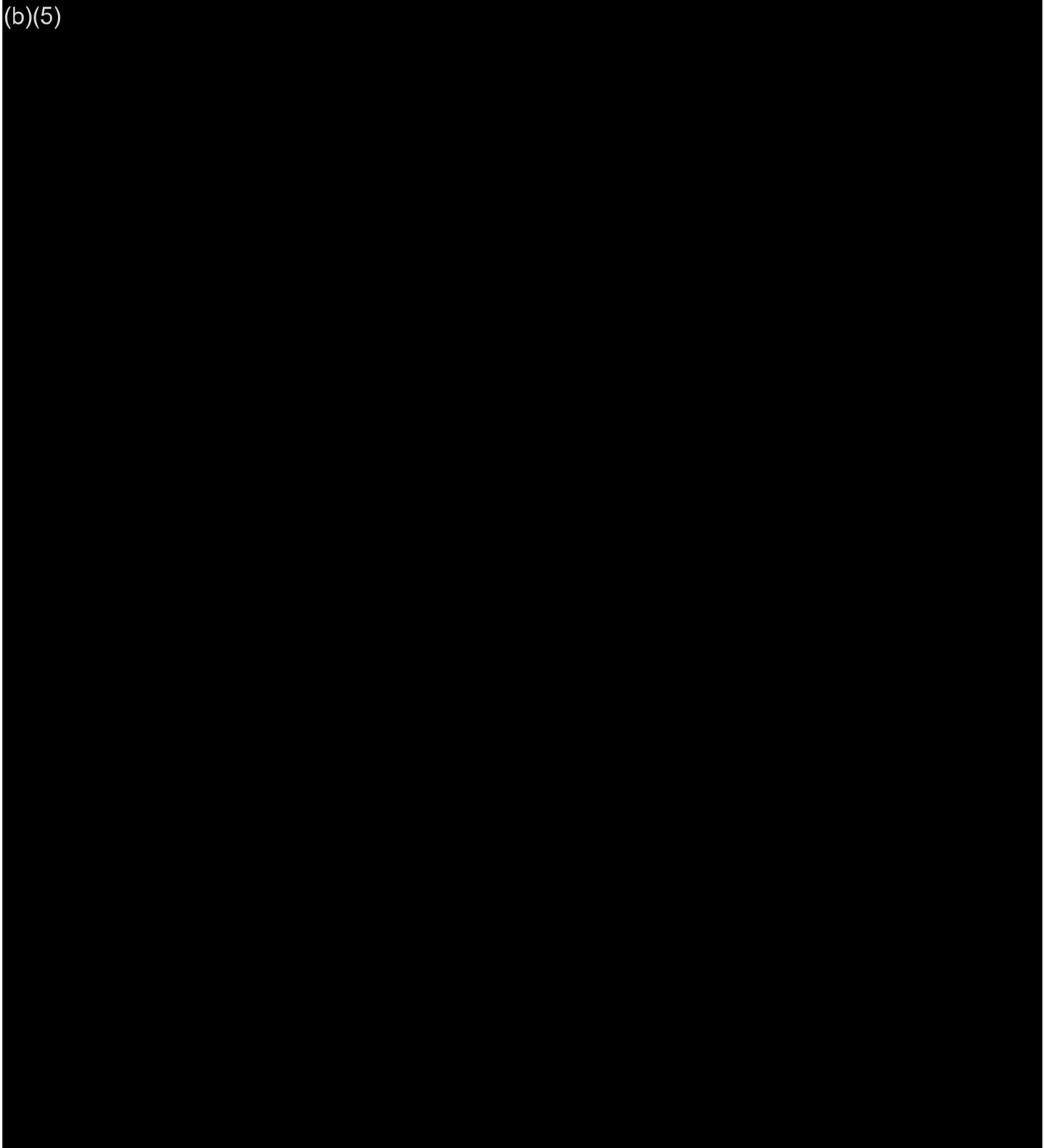


Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: September 25, 2025

(b)(5)



Agency Decision Framework Analysis (ADF)

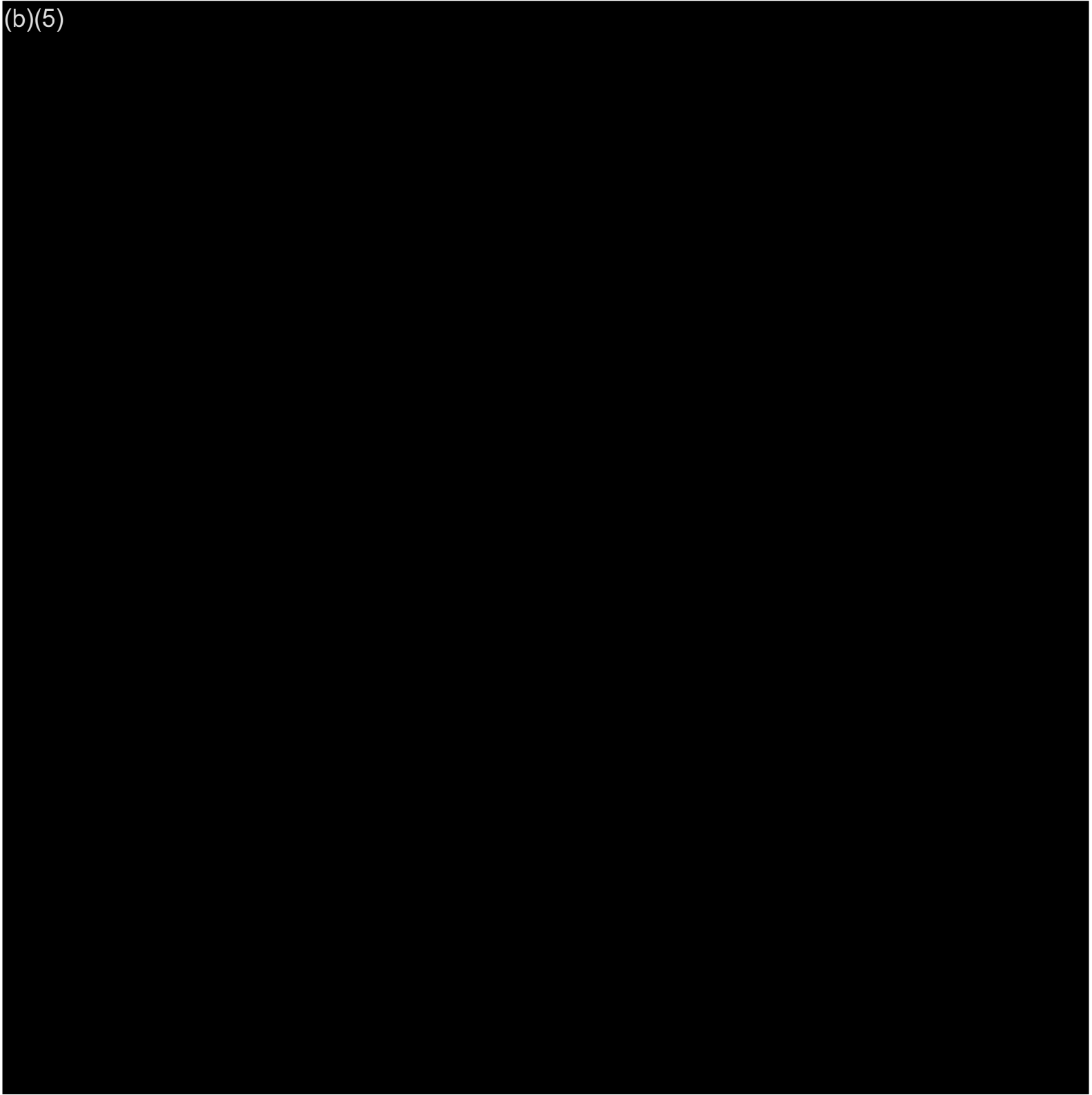
2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

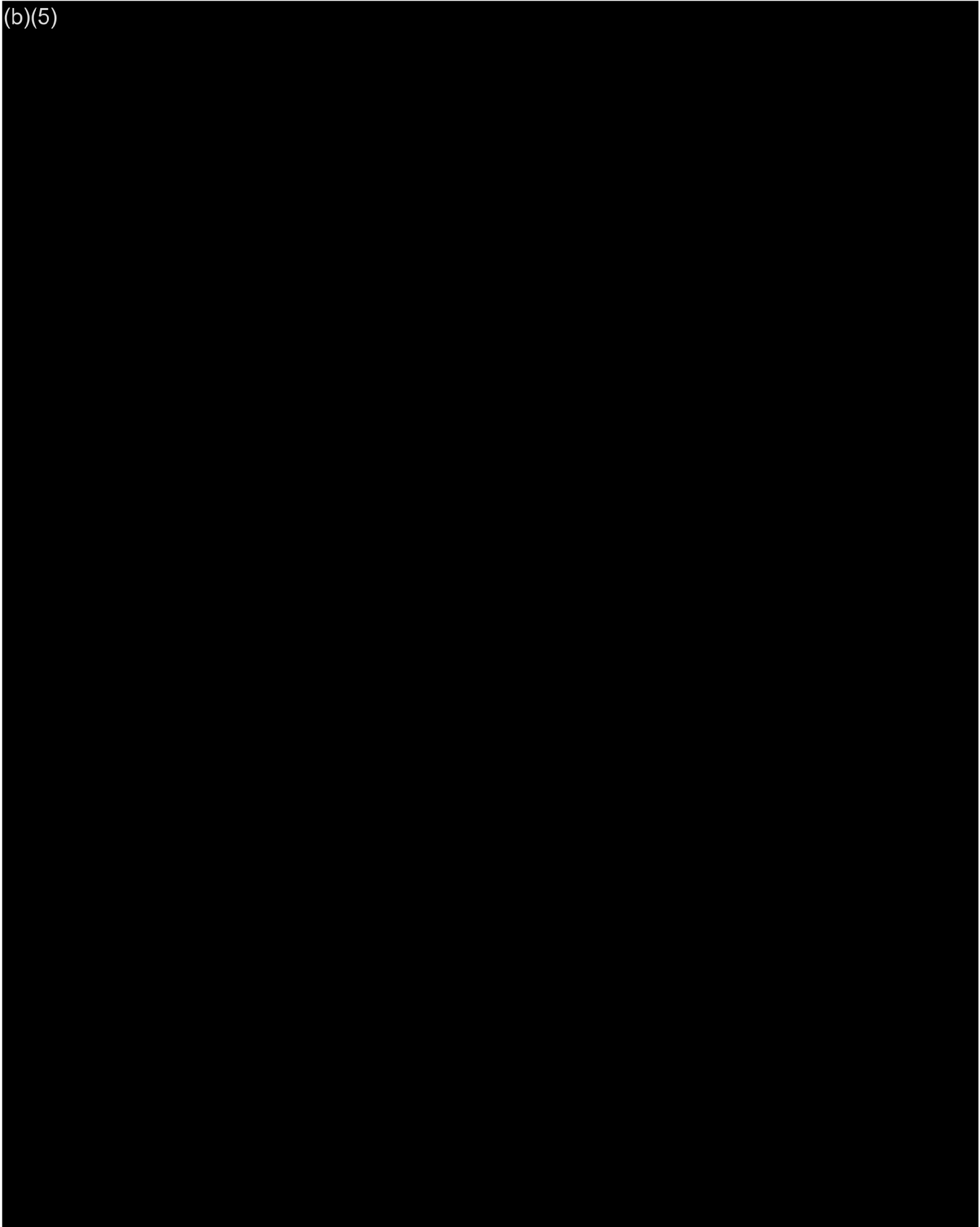
Agency Decision Framework Analysis (ADF)

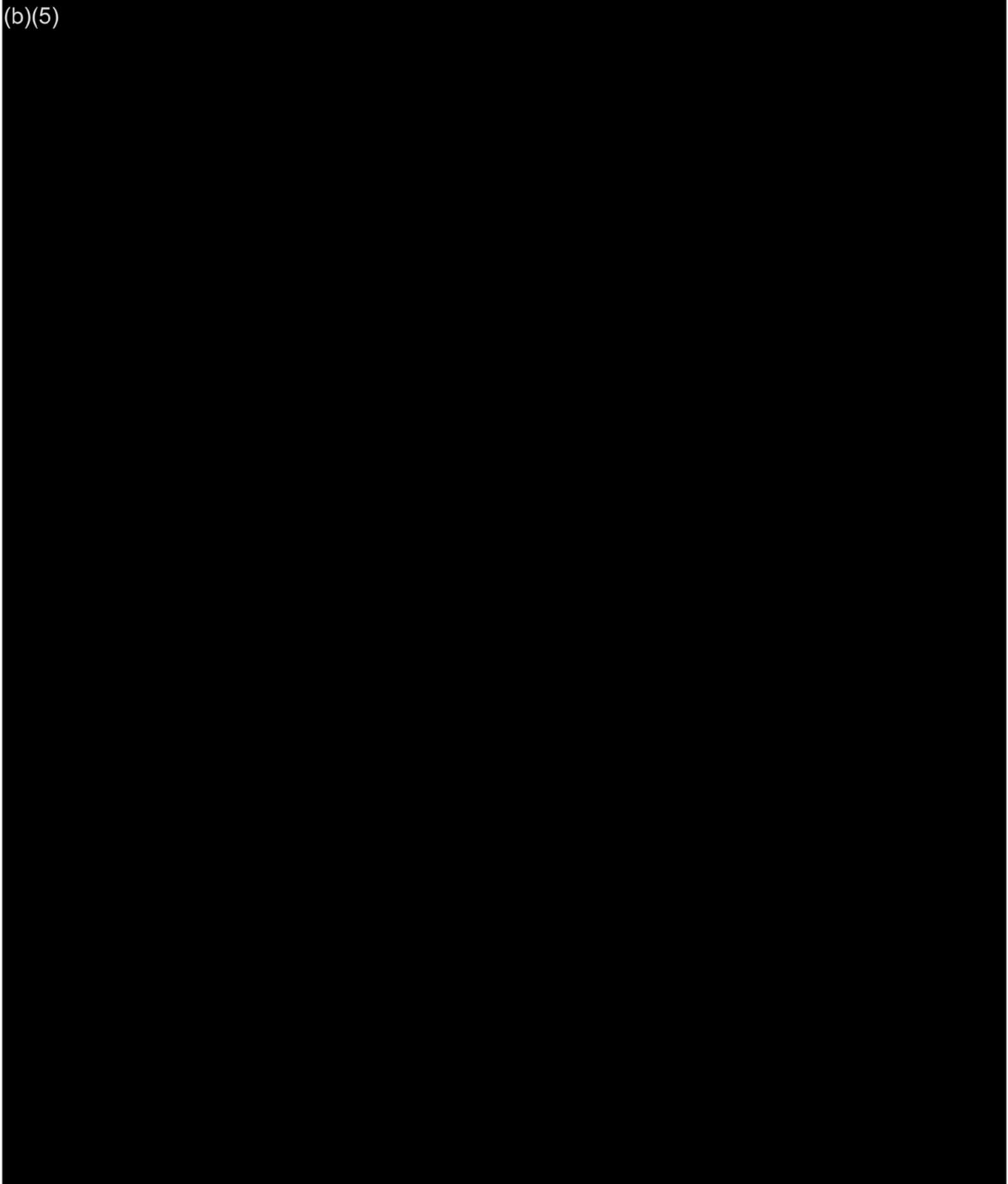
2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: May 5, 2026

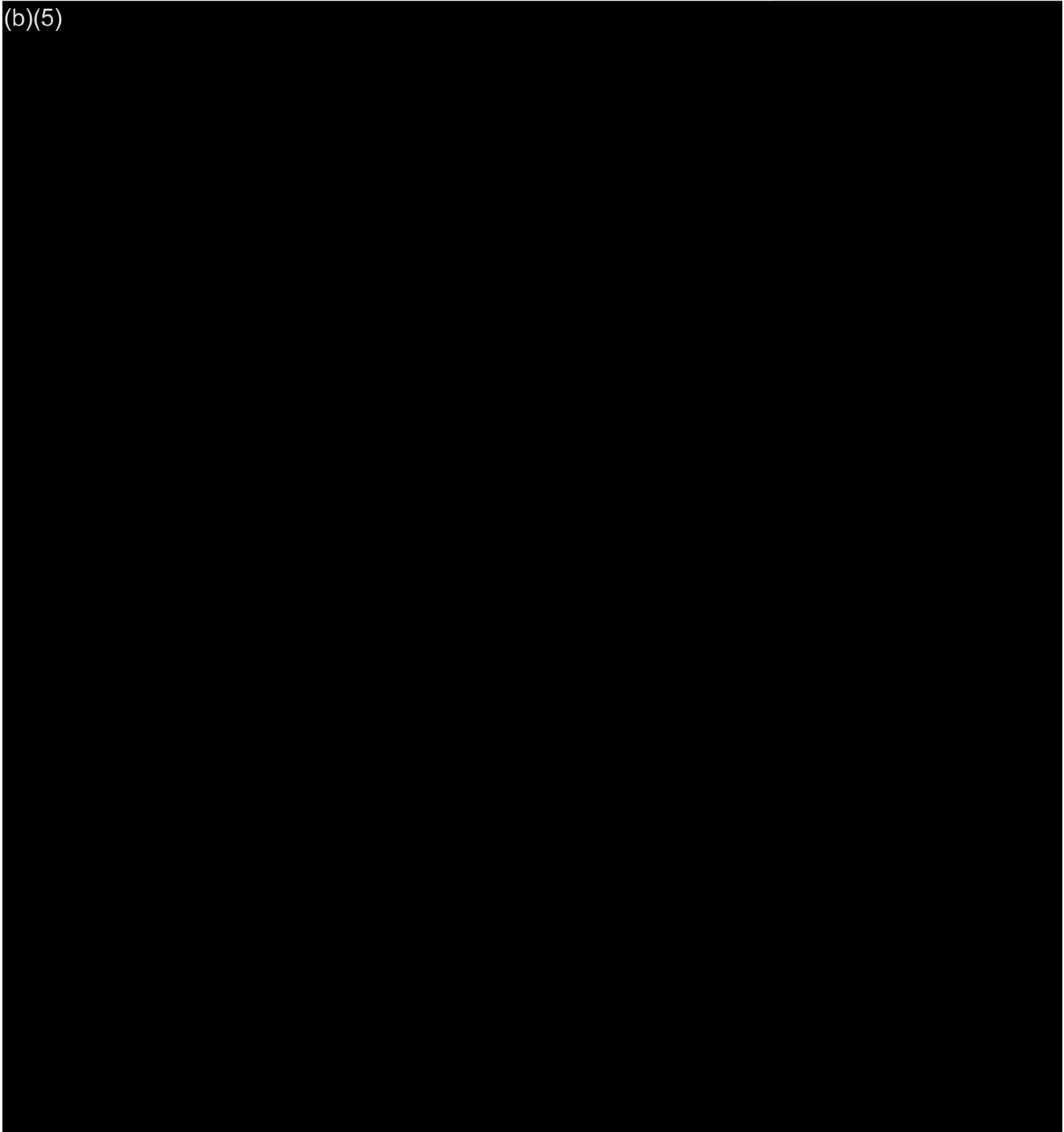
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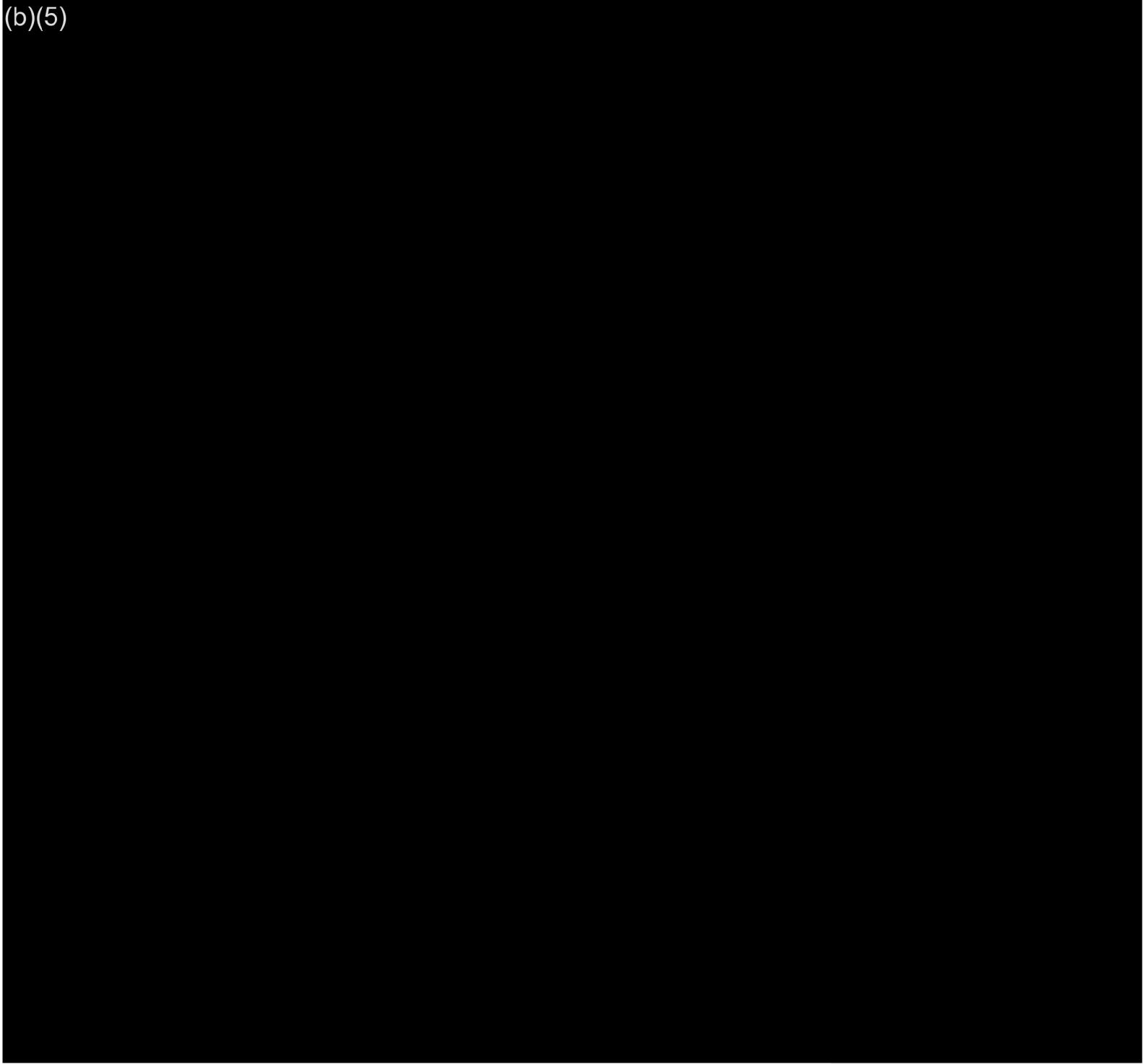




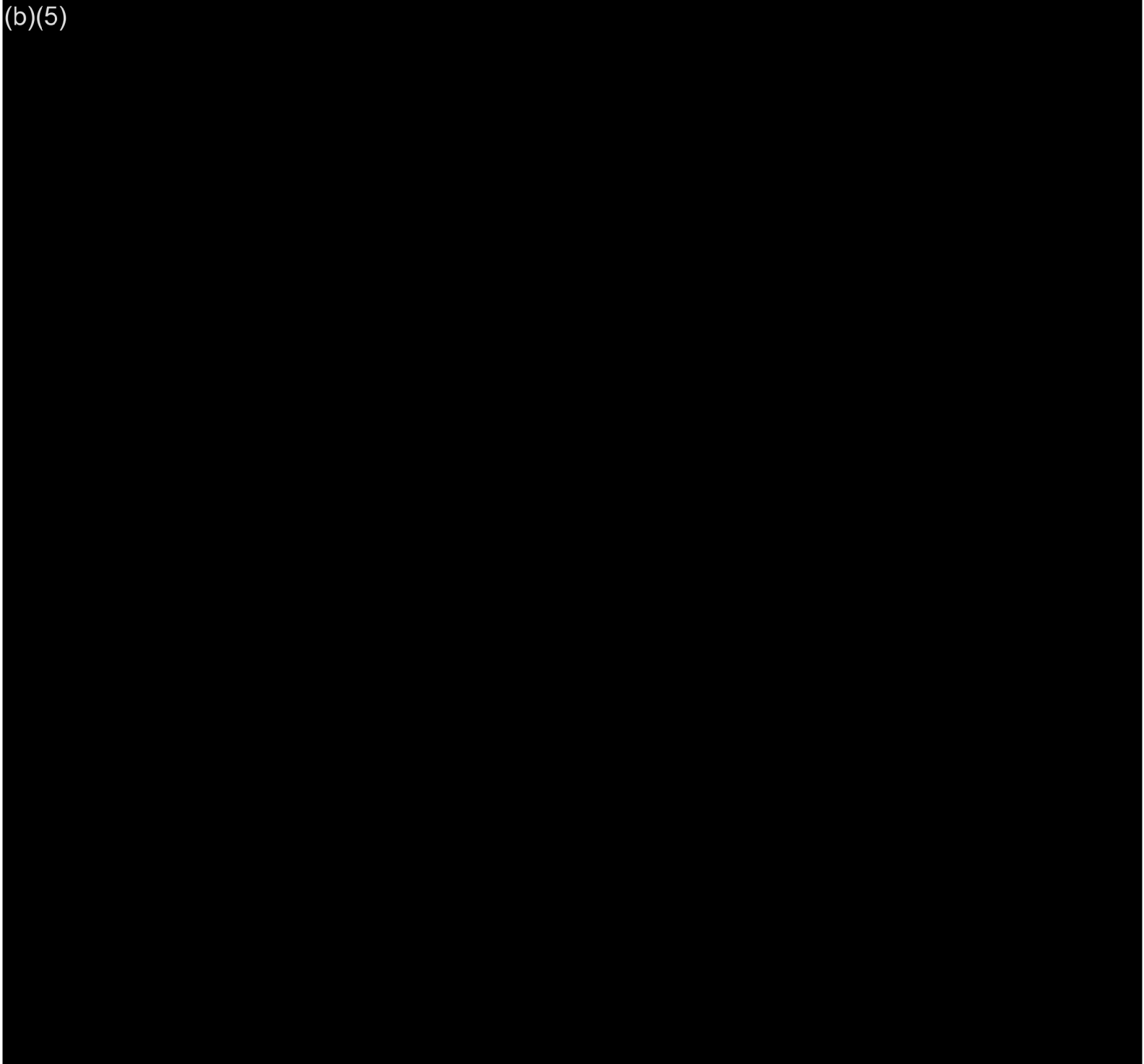
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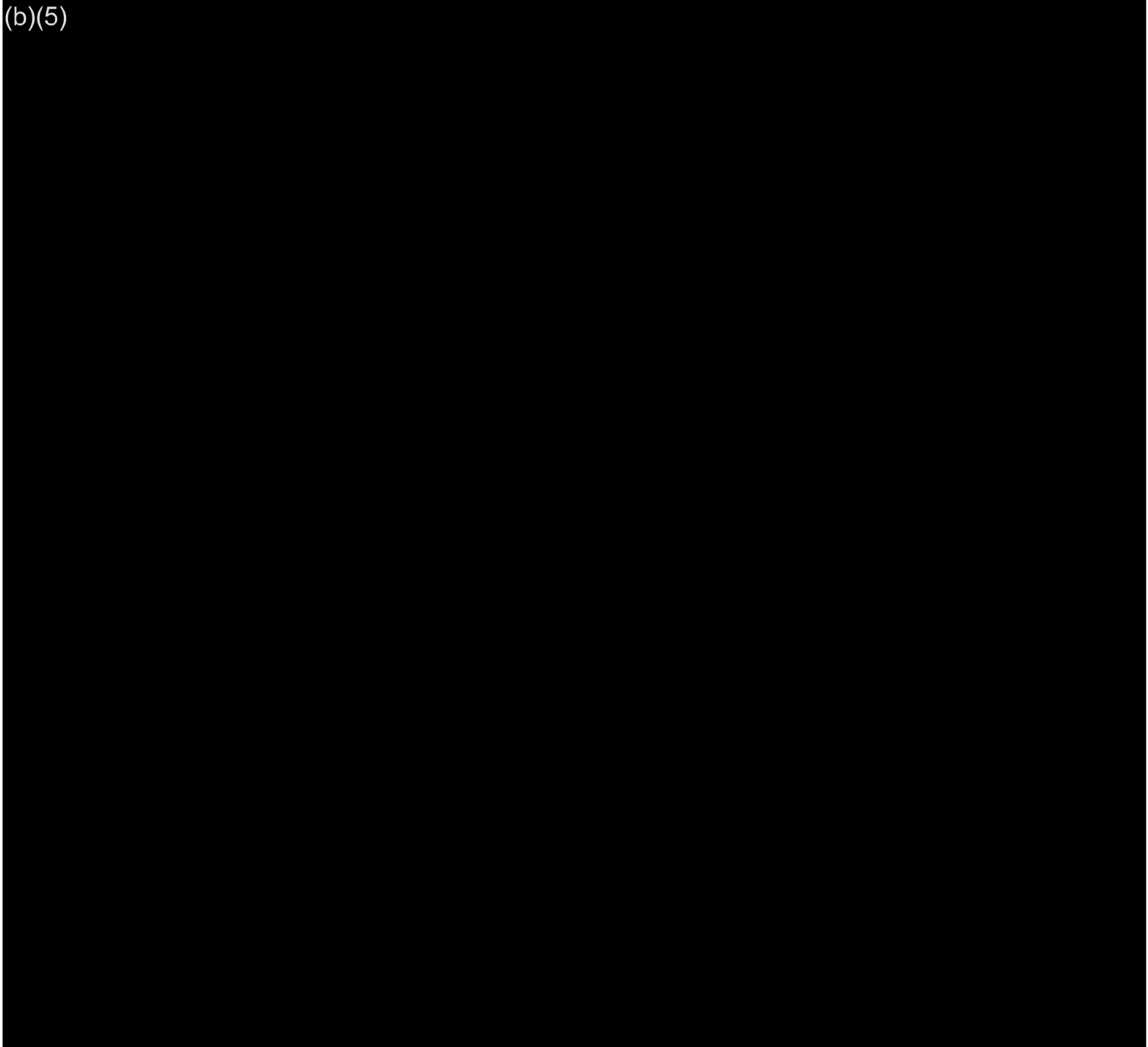
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(b)(5)



(b)(5)



Agency Decision Framework Analysis
2029 Rate Case (BP-29) Short Distance Discount (SDD)/ Behind the meter

a.

7.

- Identify the risks associated with the alternative actions or approaches.
 - Assess effectiveness of existing controls for mitigating the risks identified.
 - Analyze the likelihood and consequences of each risk.
 - Evaluate the risks to determine whether they are acceptable or must be mitigated.
- See [Additional Guidance and Resources for Step 7](#) for assistance with scenario development and scoring/rating risks

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8. Analyze & rank alternatives

- Analyze status quo and alternatives using decision criteria from Step 4.
 - Rank order status quo and alternatives based on the analysis and insights.
 - Based on the analysis, consider hybrid alternatives that may be more effective.
 - Formulate the recommendation, explaining why the recommended alternative is the best.
- See [Additional Guidance and Resources for Step 6](#) for further guidance on evaluation of alternatives.

9. Present findings & document decision

- Develop briefing package.
- Present results to the decision maker(s), including decision insights, minority opinions, and preliminary implementation plan assumptions.
- Document decision, supporting information, high level planning estimates, and performance expectations informed by decision criteria.

See also [Additional Guidance and Resources for Step 9](#).

10. Transition to implementation:

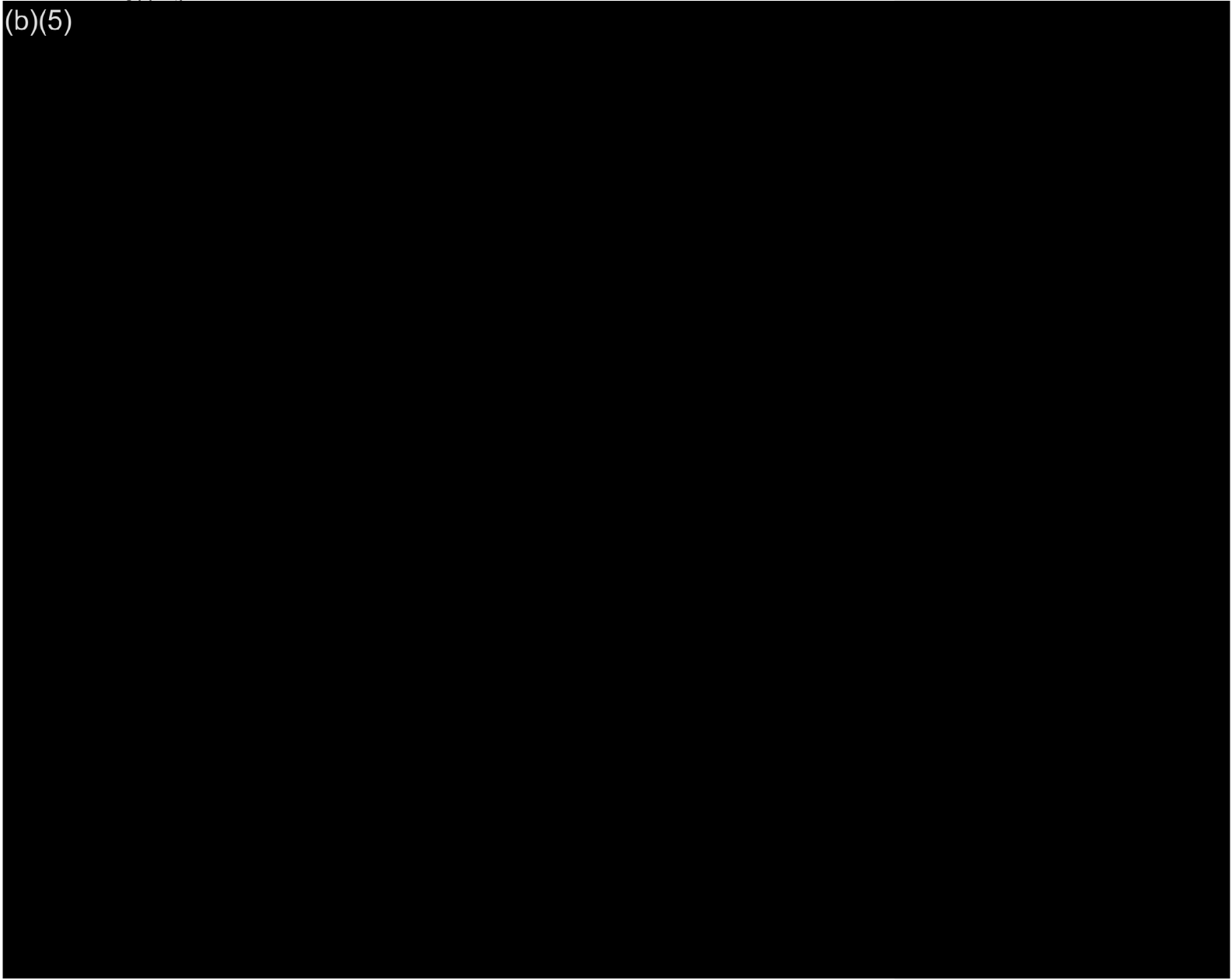
- Decision maker assigns management accountability for implementation.
 - Form implementation team.
 - Implementation team debriefs with ADF team.
 - Management ensures that monitoring and reporting process is established.
- See [Additional Guidance and Resources for Step 10](#) for an implementation charter template.

Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

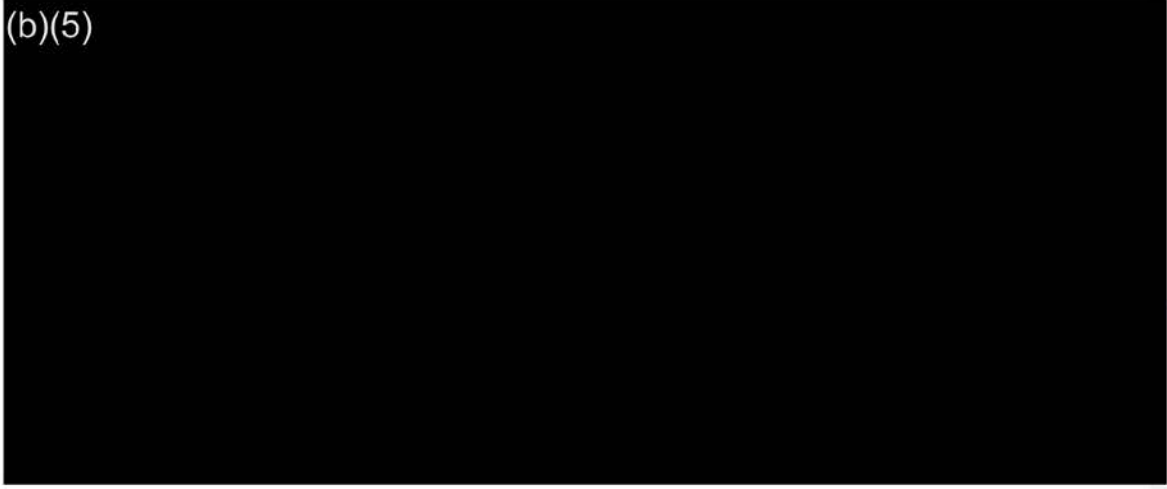
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

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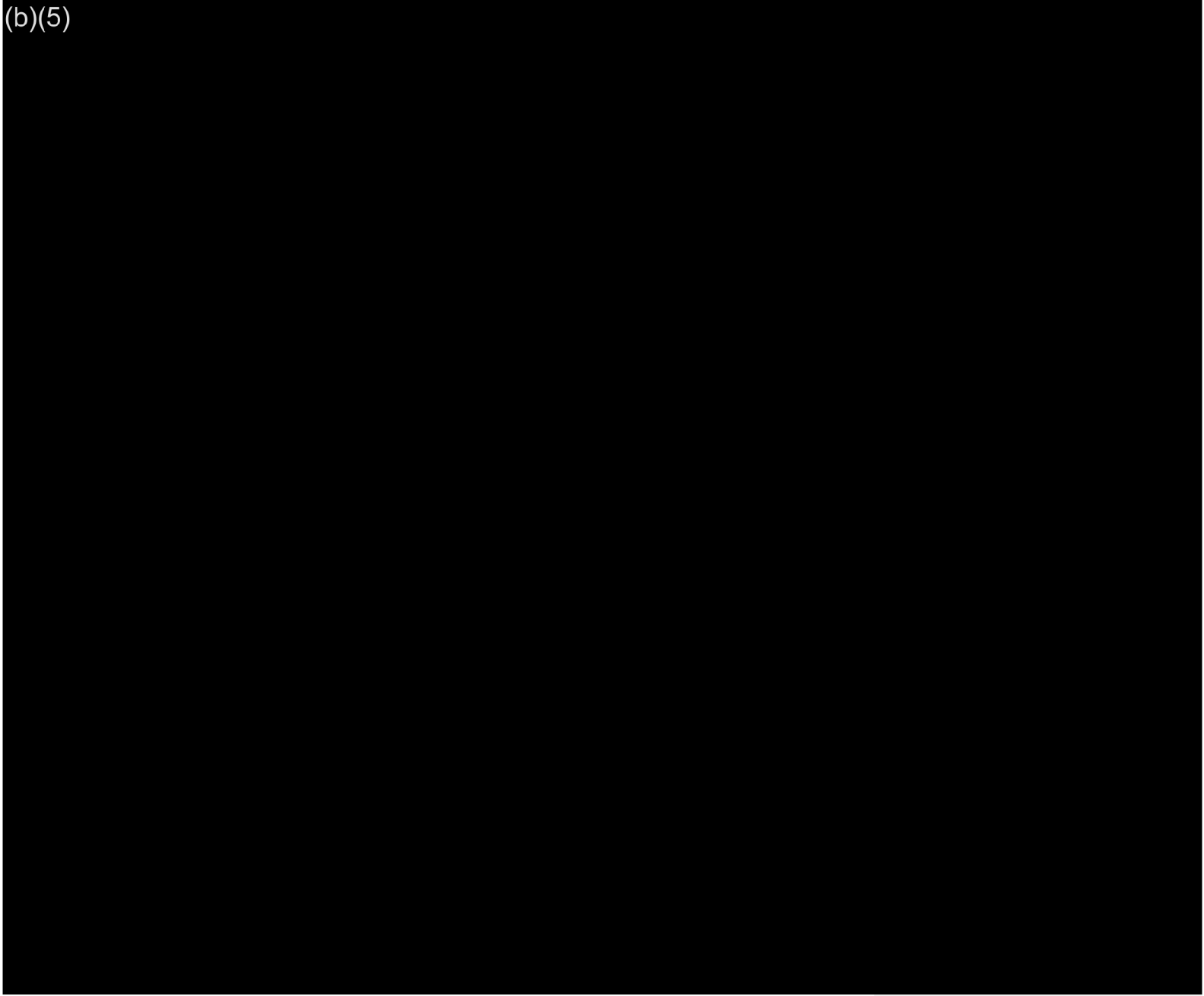
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

Meeting date: August 27, 2025

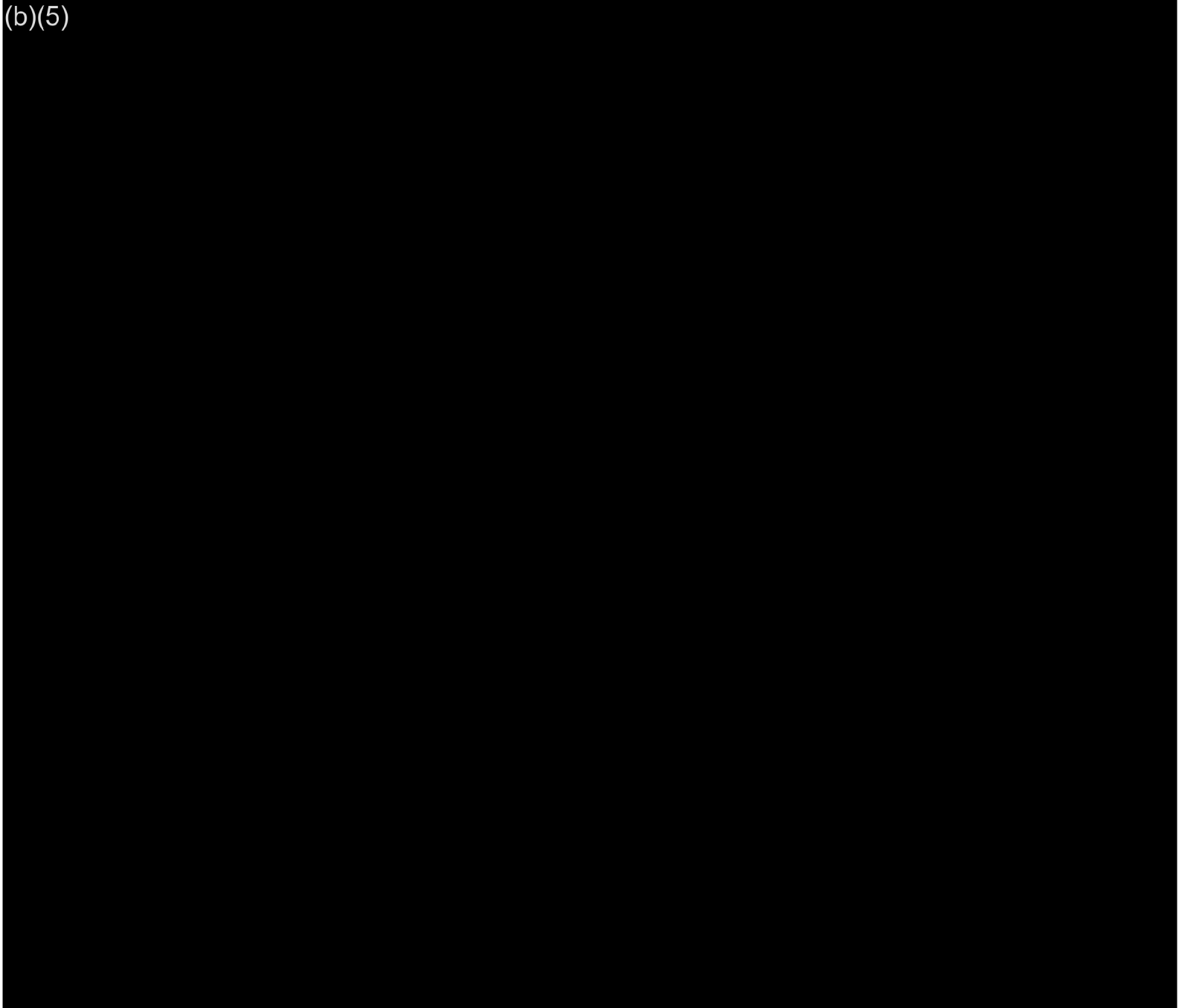
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Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

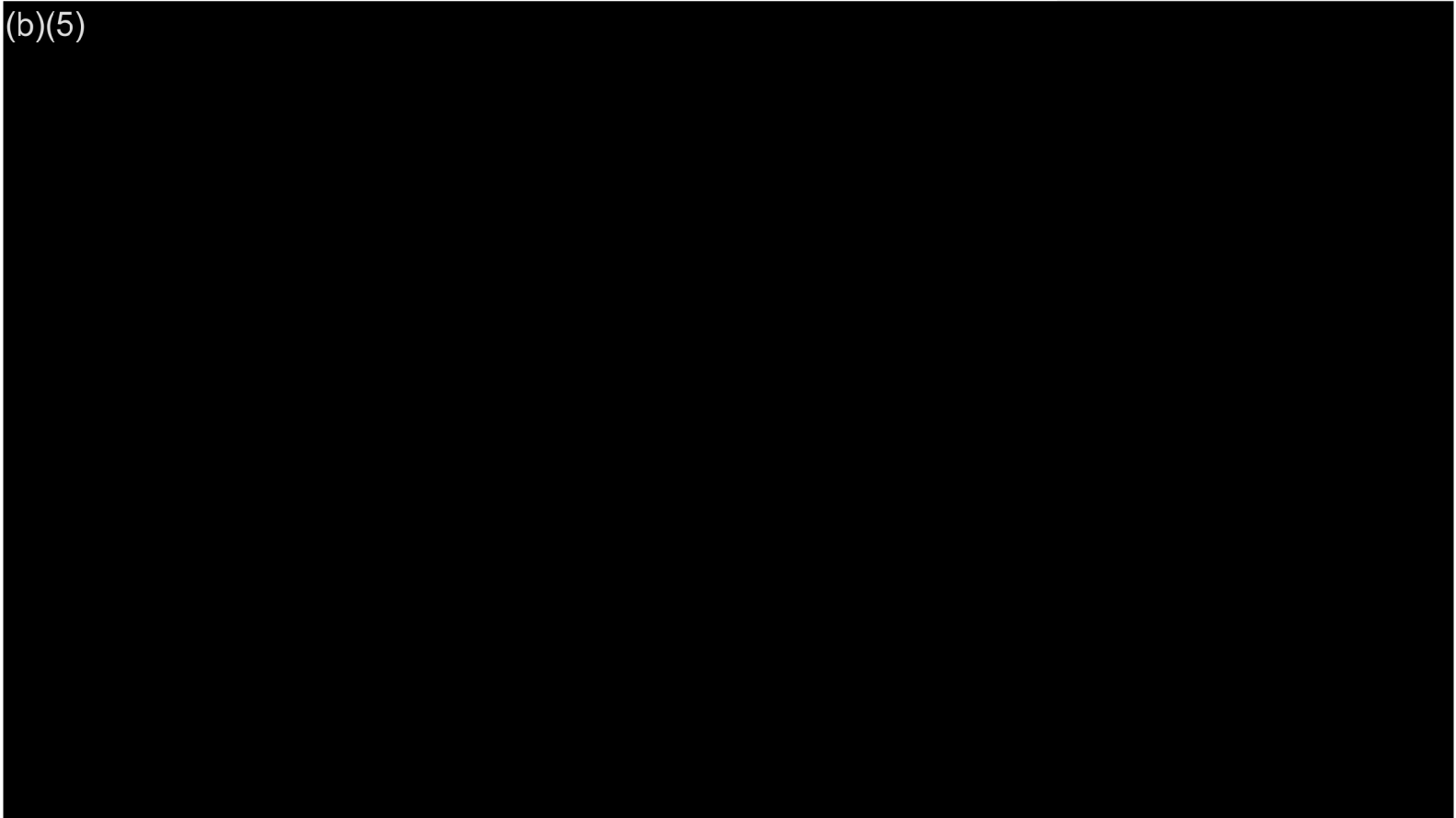
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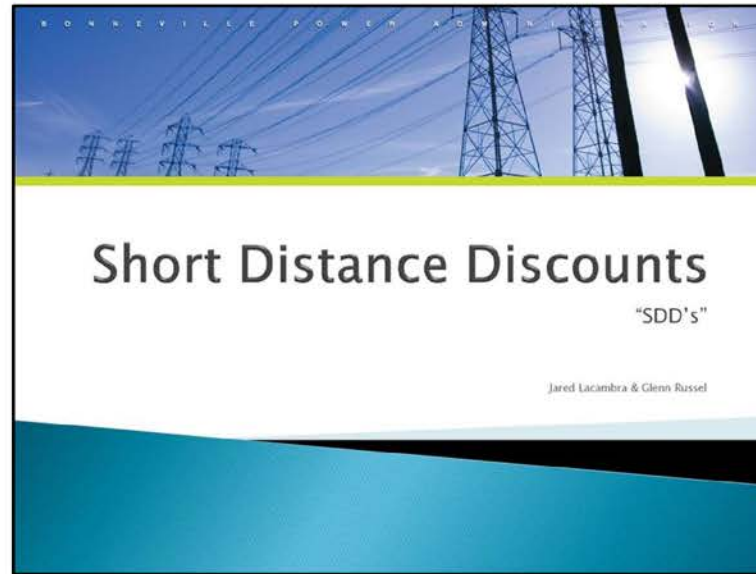


Agency Decision Framework Analysis (ADF)

2029 Rate Case (BP-29)- Short Distance Discount / Behind the Meter

(b)(5)





Overview

- ▶ What are they?
- ▶ How does TPC fit in?
- ▶ When are they applied?
- ▶ Process
- ▶ What's Next
- ▶ Questions.

TPC SDO Presentation 3/8/21

What are they and When are they applied?

- ▶ SDD's are applicable for long term use of the FCRTS for distances less than 75 circuit miles.
- ▶ The FCRTS includes facilities for which BPA TS has procured transmission rights (leases, etc.). Does not include transmission rights purchased by BPA Power Services for service to transfer customers.

TPC SDO Presentation 3/8/21

When are they ineligible

- ▶ System Sale: Sale to a customer, usually wholesale, from the seller's system as a whole, without identifying a specific resource as being the creator of the power being sold.
- ▶ Calculated circuit miles are more than 75miles.

TPC SDO Presentation 3/8/21

New Controls added 2/24/21

- ▶ The AS will now double check the PTP contract when new service or renewals come up for not only SDD applicability, but to double check the source sale. If the POR (source) is BPA Power/FCRPS then SDD is not applicable. The Account Specialists will flag this for the Customer Service Engineer before sending this to them for review.
- ▶ The Transmission AEs will pull together their CAT and discuss any billing issue before moving forward with any charge or credit. This applies to not only SDD, but all major billing corrections.
- ▶ After initial finding of incorrect billing, and before it is moved to correct the error, the AE should pull their CAT together and double check the amounts and all input documentation leading to that assumption

TPC SDD Presentation 3/8/21

The Equation

• $AVG \text{ Gen of the DNR during HLH} * NT \text{ Rate} *$
 $\left(\frac{75 - Tx \text{ Distance}}{75} \right) (0.4) = \text{Short Distance Discount}$

- Where x = circuit miles.

[illegible]

Process

- ▶ First, Identify the POD and POR.
 - This is defined in the transmission contract.
- ▶ Before going any further a “high level” test can be performed in EGIS. It is a quick and easy way to see if the distance significantly exceeds 75 miles. If it does then no calculation is needed. Notify the Account Specialist.

TPC SDO Presentation 3/8/21

Process: Identifying Paths from POR to POD (Method 1)

Using the Transmission One line diagram to identify possible circuit paths.

- Navigate to the [System Electrical Data SharePoint site](#)
 - This site contains all of the needed reference materials.
- Use the [Transmission System One-Line](#) for identifying possible circuit paths.



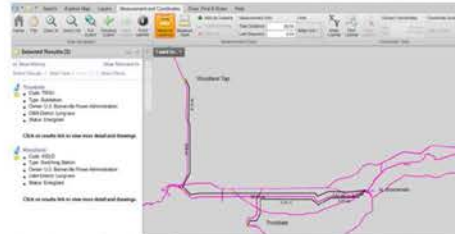
- This is strictly for determining possible circuit paths, **not obtaining the distance**.
- If the circuit path is easily identifiable as greater than 75 miles the process can stop here, as SDD's are only calculated for distances less than 75 miles.
- Keep track of the line names that are identified to be part of the circuit path; we will use them in the next step.

TPC SDD Presentation 3/8/21

Process: Identifying Paths from POD to POR (Method 2)

Using EGIS to identify possible circuit paths.

- › Navigate to the [EGIS Website](#).
- › EGIS has the functionality to search for lines and substations, and measure distances between two designated points, or piecewise along a circuit path.



- › It can also be used to identify various circuit paths from POD to POR
- › If the circuit path is easily identifiable as greater than 75 miles the process can stop here, as SDD's are only calculated for distances less than 75 miles.
- › Keep track of the line names that are identified to be part of the circuit path; we will use them in the next step.

TPC SDD Presentation 3/8/21

Process: Finding Actual Circuit Miles

- Once possible circuit paths have been identified, navigate to the **Transmission Line Impedance book** (These are kept up to date and the line lengths should be the same in both.)



- Use this resource to obtain the actual circuit miles of the lines that were found to make up the path between POD and POR.
- It is important to pay close attention that the total distance is the aggregate total of individual line sections. In some cases the POR or POD will only be a part of the way down the line.
- Sum the length of all the line sections making up a particular circuit path between the POR and POD.

TPC SDO Presentation 3/8/21

- Use this resource to obtain the actual circuit miles of the lines that were found to make up the path between POD and POR.
- It is important to pay close attention that the total distance is the aggregate total of individual line sections. In some cases the POR or POD will only be a part of the way down the line.
- Sum the length of all the line sections making up a particular circuit path between the POR and POD.

Process: NETWORK TRANSMISSION CUSTOMERS

- NT customers are eligible for an SDD if they have a resource that is using less than 75 miles of the FCRTS, including behind the meter resources connected directly to the customer's system. The method is described in the NT Rate Schedule, but in a nutshell, BPA must ensure that the amount of designated capacity from the resource allocated to any POD **may not** exceed the POD's peak load.
- A Designated Network Resource (DNR) that is a system sale (the DNR is not associated with a specific generating resource) does not qualify for the SDD.
- For a DNR SD directly connected to the customer's system (including Behind the Meter Resources) or a DNR SD that does not use BPA's network facilities, the Tx Distance shall be zero. (ex: Horn Rapids Solar on City of Richlands Meter Diagram.)
- For more information go to the NT section of the [Transmission Rate Schedules](#) (pg. 11-13)

TPC SDD Presentation 2020

Process: PTP CONTIGUOUS CUSTOMERS

- System sales do not qualify for SDD. If a set of contiguous PODs qualifies for an SDD, the transmission distance used in the calculation of the SDD shall be between the POR and the POD farthest from the POR.
- For more information go to the PTP section of the [Transmission Rate Schedules](#) (pg. 17)

TPC SDD Presentation 3/8/21

COOK COUNTY

CBSA

- NOTE: Circuit miles are not inputted into CBSA by the CSE until we are notified by the Account Specialist.
- Once the Circuit miles have been calculated they are entered into [CBSA SDD Contract Rights](#).

BPA - Commercial Business Support Application (CBSA)

Production BUD (b)(6) [What's New 2020 B6](#) HI-WEB-00000W Home About Contact

Customer Billing Support
Manage Short Distance Discount (SDD):
[SDD Contract Rights](#) 
[SDD Eligibility](#)

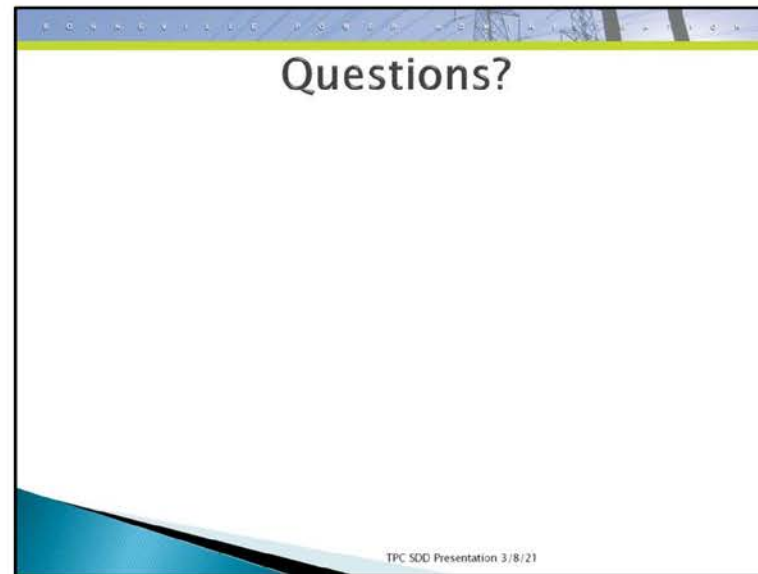
TPC SDD Presentation 3/8/21

CBSA

- NOTE: Circuit miles are not inputted into CBSA by the CSE until we are notified by the Account Specialist.
- If your calculation is from an existing TSR AREF and is already in the SDD list it is entered here:

- If the calculation is new and needs to be added to the SDD list it can be looked up and entered here:

TPC SDD Presentation 3/8/21



Calculating Circuit Miles for a Short Distance Discount (SDD)

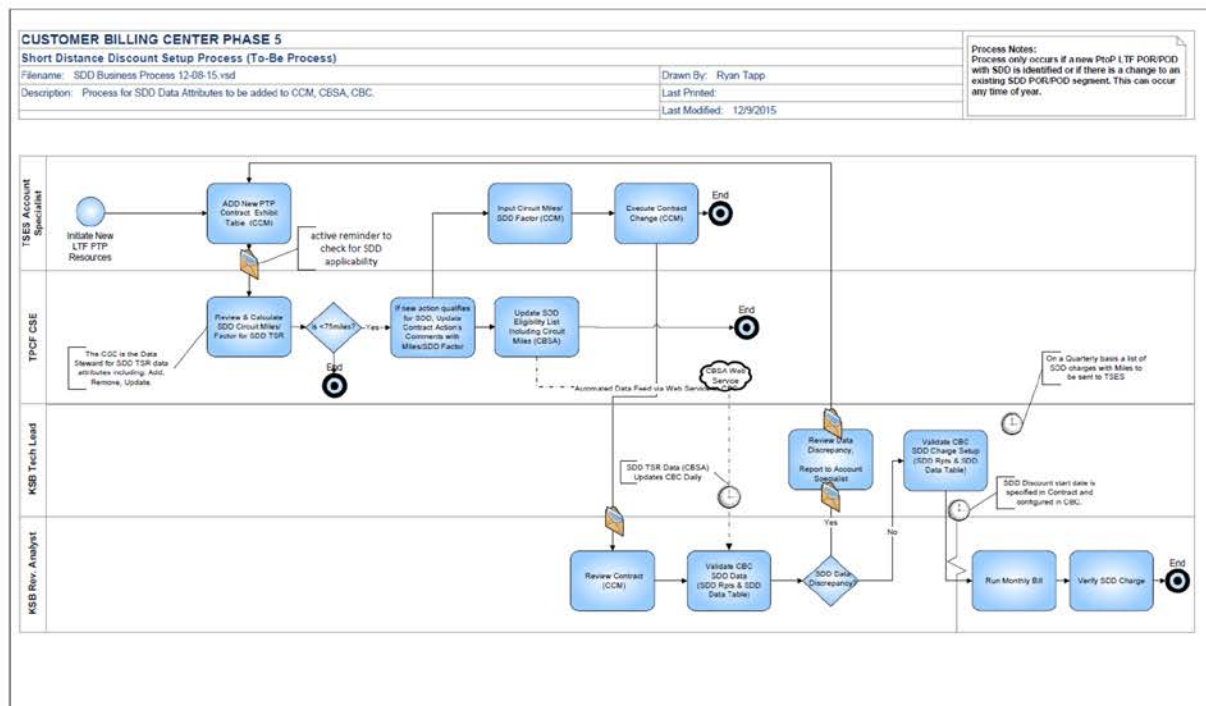
This purpose of this document is to show the official TPC process to determine the circuit miles used in Short Distance Discount Calculation.

SDD's are applicable for long term use of the FCRTS for distances less than 75 circuit miles

The FCRTS includes facilities for which BPA TS has procured transmission rights (leases, etc.). Does not include transmission rights purchased by BPA Power Services for service to transfer customers.

$$\text{AVG Generation of the DNR at HLH} * \text{NT Rate} * \left(\frac{75 - \text{Tx Distance}}{75} \right) (0.4) \\ = \text{Short Distance Discount}$$

Where Does TPC fit in?



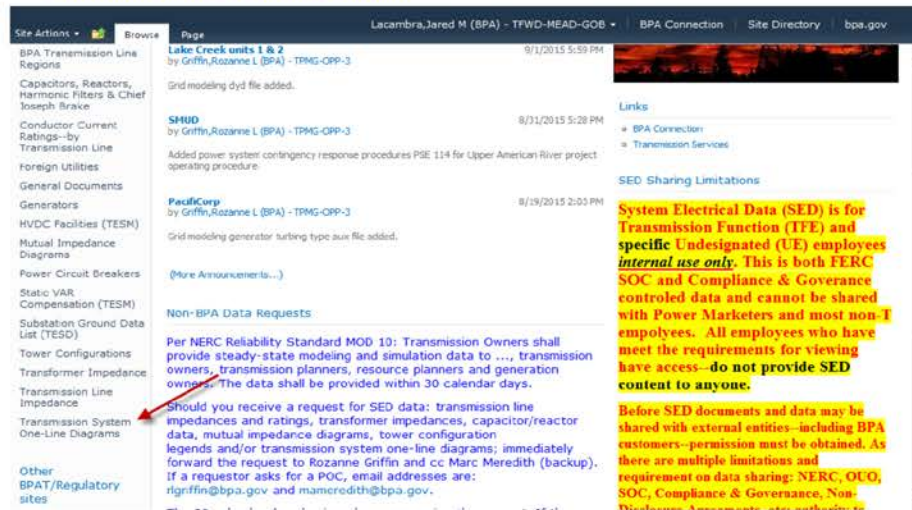
Process

- Identify POD and POR
 - This is defined in the Transmission contract.
 - Before going any farther a “high level” test can be performed in Egis. It is a quick and easy way to see if the distance greatly exceeds 75 miles. If it does then no calculation is needed. Notify the Account Specialist.

Identifying Paths from POD to POR

Method 1: Using the Transmission One line diagram. This is same diagram as the DJD, it is kept up to date.

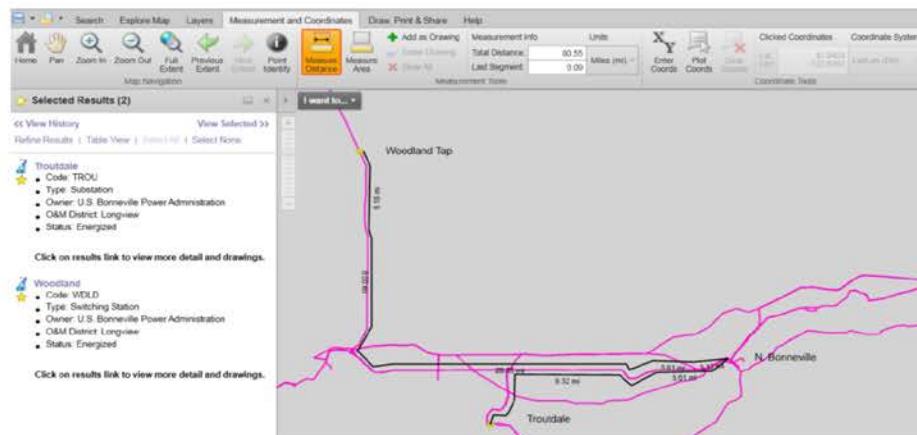
- Navigate to the [System Electrical Data SharePoint site](#)
 - This site contains all of the needed reference materials.
- Use the [Transmission System One-Line](#) for identifying possible circuit paths.



- This is strictly for determining possible circuit paths, **not obtaining the distance**.
- If the circuit path is easily identifiable as greater than 75 miles the process can stop here; as SDD's are only calculated for distances less than 75 miles.
- Note the line names that are identified to be part of the circuit path; we will use them in the next step.

Method 2: Using EGIS

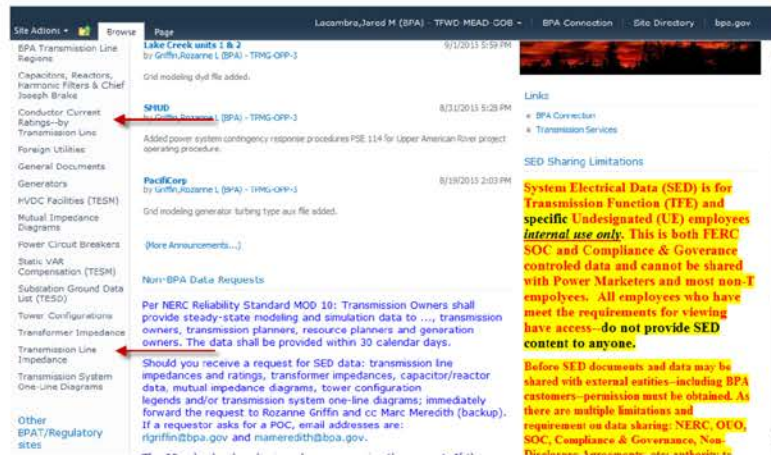
- Navigate to the [EGIS Website](#).
- EGIS has the functionality to search and measure Transmission Lines from two designated points.
- It can also be used to identify various circuit paths from POD to POR



- If the circuit path is easily identifiable as greater than 75 miles the process can stop here, as SDD's are only calculated for distance less than 75 miles.
- Keep track of the line names that are identified to be part of the circuit path; we will use them in the next step.

Finding Actual Circuit Miles

- Once possible circuit paths have been identified, navigate to the [Transmission Line Impedance book](#)



- Use these resources to obtain the actual circuit miles of the lines that were found to make up the path between the POD and the POR.
- It is important to pay close attention that the total distance is the aggregate total of individual distances between structures. In some cases the POR will only be a part of the way down the line.
- Sum the length of all the line sections making up a particular circuit path between the POR and the POD.
- All bus work will be disregarded in calculation and entered as a zero for circuit miles.

NT CUSTOMERS

- NT customers are eligible for an SDD if they have a resource that is using less than 75 miles of the FCRTS, including behind the meter resources connected directly to the customer's system. The method is described in the NT Rate Schedule, but in a nutshell, BPA must ensure that the amount of designated capacity from the resource allocated to any POD **may not** exceed the POD's peak load.
 - For more information go to the [NT section of the Transmission Rate Case](#). (Pg. 17)

PTP CONTIGUOUS CUSTOMERS

- For PTP customers with contiguous PODs, the transmission distance used in the calculation of the SDD is between the POR and the POD farthest from the POR.
 - For more information go to the [PTP section of the Transmission Rate Case](#) (Pg. 22)

CBSA (All CSE's given edit rights on 10/29)

- Once the Circuit miles have been calculated
- they are **NOT** entered into [CBSA SDD Contract Rights](#) until the CSE is notified by the Account Specialist.

[BPA - Commercial Business Support Application \(CBSA\)](#)

Production BUD (b)(6) What's New 9/12/2016 HSW1511 About Contact

CBSA Home CBSA new look - works the same as before.

Reservations (TSRs) [Color Themes](#)

[Reservation \(TSR\) Query](#) [TSR Generator & ATC Postings List](#)

[TSR Reports](#) [Customer Billing Support](#) ← **To SDD**

[TSR Contract Review](#)

Customer Rights & Requests

[Customers \(Organizations\)](#) [Loss Providers & Scheduling/Reservation Agents](#)

[Contracts](#) [CSE Project Tracking \(Interconnect Requests\)](#)

[Agent Assignments \(AFs, CSs etc\)](#)

- If your calculation is from an existing TSR AREF and is already in the SDD list it is entered here:

TSR Short Distance Discount (SDD) List

TSR AREF: 75316225 Customer: (All) [Look up by TSR](#) [Look up by Customer](#) [Get SDD List](#) [Export SDD List](#)

TSR AREF	Circuit Miles	Customer Code	Customer Name	Source	POR	Sink	POD	Request Type	Start Date	Stop Date	TS Class	TS Increment	TS Period	TS Subclass	TS Ty
(b)(4)															

Click Edit: Enter Circuit Miles

- If the calculation is new and needs to be added to the SDD list it can be looked up and entered here:

[BPA - Commercial Business Support Application \(CBSA\)](#)

Production (b)(6) What's New 9/12/2016 HSW1511 Home About Contact

SDD Contract Rights [Close](#)

Lookup TSR to Add to the SDD List

TSR AREF: [Look up by AREF #](#) [Look up by SH](#)

TSR AREF	Request Status	Customer Code	Customer Name	In SDD List	Path	Request Type	Source	POR	Sink	POD	Start Date	Stop Date	Request MW	Granted MW	TS Class	TS Increment	TS Period	TS Subclass	TS Type	TS Window	Service
No records to display.																					

Enter found Circuit Miles click add

Circuit Miles: [Add TSR to SDD List](#)

Moving Forward

- Use the excel spreadsheet titled SDD miles to keep track of the circuit miles that you calculate. This will save the CSE time if asked to recalculate or verify a SDD.
- Currently everyone has access to CBSA in order to enter in Circuit Miles.