



TC-20 Tariff Development

TC-20 Workshop Topics

Today {

- **Ancillary Services (Schedule 10)**
- **Price Cap and Financial Middleman**

**Subsequent
Workshops
(Aug – Sept)**

- NT NOA and Attachment G
- NT Redispatch and Attachment M
- NT Conditional Firm
- Ancillary Services
- Generator Interconnections (Attachments L and N)
- Hourly Firm
- Losses
- Tariff
- Price Cap and Financial Middleman

Future TC-22 Tariff Proceeding

- BPA is proposing to use current tariff language for the deferred topic list below (Specific sections for each topic are also posted).
- Deferred tariff language topics for sections related to:
 - Study Process
 - Excluding undesignations for firm market sales less than one year
 - Attachment C (ATC Methodology)
 - Attachment K (Regional Planning)
 - PTP and NT agreement templates
 - Simultaneous Submission Window (SSW)
 - Creditworthiness
- Identified deviations will be addressed in TC-22.

TC-20 Workshop Timeline

APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	November
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BPA develops proposed tariff language

Customers review proposed tariff language & provide feedback

BPA prepares for TC-20 Initial Proposal



TC-20 begins
November
2018



Miscellaneous Updates to TC-20 Tariff Proposals

Addressing miscellaneous provisions

- In June, BPA clarified what topics were related to sections flagged as “under review”.
- We identified a number of miscellaneous sections that were not specifically related to a TC-20 topic but we had identified a potential deviation from the *pro forma* tariff.
- These are sections related to: Procedures Addressing Parallel Flows, Attachments for Lists of Customers, and cross references and other minor deviations from *pro forma* (including a reference to an intra-hour scheduling business practice and sections with requirements for POD and POR).
- Today we will review our proposals for these sections.

Sections related to Procedures Addressing Parallel Flows

- BPA adopted Attachment J and included the reference to the WECC reliability standards in 2012. In addition, BPA revised sections 13.6 (curtailment of firm transmission service), 14.7 (curtailment or interruption of service), and 33.4 (curtailment of scheduled deliveries) to state that BPA may implement curtailments pursuant to procedures addressing parallel flows set forth in Attachment J.
- The *pro forma* tariff uses the term “transmission loading relief procedures” rather than “procedures addressing parallel flows” in sections 13.6, 14.7, and 33.4.
- BPA proposes to retain the textual deviation from *pro forma*, the reference to “procedures addressing parallel flows” because this aligns with the terminology used in the description applicable to the western interconnection and with the language in BPA’s Attachment J. The proposed language is aligned with *pro forma* in its intent.
- Section 33.4 is flagged as “under review” in the draft tariff proposal because it includes a reference to NT conditional firm. However the language that BPA is discussing relating to Attachment J in section 33.4 is available for you review in a handout we’ve posted.

Attachments for lists of NT and PTP Customers

- The *pro forma* tariff requires a list of customers to be included in Attachment E (Index of Point-to-Point Transmission Service Customers) and Attachment I (Index of Network Integration Transmission Service Customers).
- Attachments E and I of BPA's current tariff includes a link to OASIS where the list of customers is maintained.
- In reviewing other transmission providers (PacifiCorp, Puget Sound, Avista, Southern, Duke), BPA has found that the common practice in Attachments E and I is to reference the Transmission Provider's Electronic Quarterly Report (EQR) filings to FERC for the list of current NT and PTP customers. These Transmission Providers no longer list the customers in attachments to their tariffs.
- BPA proposes to retain its current language in Attachments E and I in its new tariff. BPA will continue to post its list of customers on OASIS. Additionally, BPA will continue its practice of submitting EQR filings with FERC. This aligns with the intent of *pro forma* in providing this information and also with industry best practice.

Cross-references and removal of additional language

- Section 19.2(iii), System Impact Study Agreement and Cost Reimbursement
 - In the *pro forma* tariff, section 19.2(iii) contains an erroneous reference to section 20 for how a Transmission Provider will account for costs of a System Impact Study it conducts on its own behalf.
 - BPA's current tariff corrects this incorrect cross-reference and instead includes a reference to section 8 for how BPA will account for such costs.
 - BPA is proposing to retain the cross-reference in section 19.2(iii) to section 8 rather than section 20.
- Section 30.8, Use of Interface Capacity by the Network Customers
 - BPA is proposing to remove an extraneous cross-reference to section 28.4 and align the language with *pro forma* for this section.

Cross-references and removal of additional language (cont'd)

- Section 1.39, Pre-Confirmed Application and Section 18.2, Completed Application
 - BPA is proposing to remove the additional language in its current tariff, “full amount of the” from these sections. This language is not in the *pro forma* tariff and in its review, BPA has determined this language is unnecessary. There is no impact to removing the additional language.
- Sections referencing Intra-Hour Scheduling Business Practice:
 - BPA has added additional language in sections 13.8 and 14.6 related to intra-hour scheduling changes and the scheduling business practice. In its review, BPA has determined the non *pro forma* language is unnecessary. BPA is proposing to remove the deviation and align these sections with the *pro forma* tariff.
 - Section 13.8 is flagged as “under review” in the draft tariff proposal because that section also includes a reference to Hourly Firm. We have posted a handout to help clarify the language we addressing related to intra-hour scheduling.

Tariff language BPA is proposing to defer to TC-22

- Sections 1.35, 1.36 and 15.4(i) include requirements for POD and POR.
- In its review, BPA has determined the deviations from pro forma in these sections relate to the NT and PTP application and study process, which are being deferred to TC-22. As a result, BPA proposes to use its current tariff language for these sections in TC-20. Potential modifications to these sections will be addressed in TC-22.
- Sections:
 - 1.35, Point(s) of Delivery
 - 1.36, Point(s) of Receipt
 - 15.4, Obligation to Provide Transmission Service that Requires Expansion or Modification of the Transmission System, Redispatch or Conditional Curtailment