

Submitted April 3, 2020

NIPPC has the following questions following the March 17 workshop.

Many NIPPC members have been concerned regarding the potential impact of BPA's decision to join the EIM on the availability of transmission to support bilateral trading activities.

Seller's choice contracts

How does BPA encumber transmission capacity when a power customer designates a seller's choice contract as a Designated Network Resource? Does the Seller's option to designate a specific resource prior to preschedule require BPA to set aside additional transmission capacity than if the contract specified a resource? It would seem that the more options the Seller when it came to specifying a resource (and the more options the purchase had with regard to designating the source balancing area), the more transmission capacity BPA would have to set aside in order to accommodate those additional options.

Please explain how BPA determines how much transmission capacity is set aside to accommodate delivery of a seller's choice contract.

Other BPA decisions may also impact the availability of ST ATC. BPA has repeatedly delayed implementing its OATT obligation to undesignate Designate Network Resources when making off system sales from its generation resources. While NIPPC understands that BPA does purchase point to point transmission service to support its off system sales, the concern is that by failing to undesignate a resource, that resource is also still being held available to meet the needs of NT customers and accordingly transmission remains encumbered. Please explain how BPA's delay in implementing its OATT obligation to undesignate Network Resources has no impact on the amount of short term firm point to point transmission available to the market.

Likewise, BPA has delayed implementation of its ability to redispatch customers' Designated Network Resources. BPA notes that future implementation of NT redispatch would be "challenging" if the DNR is a Seller's Choice contract. Please explain how BPA anticipates implementing redispatch of non-Federal DNRs in the EIM paradigm.