

Long-term ATC Metrics: BPA Response to Customer Comments

During the [May 26, 2021 LT Commercial Planning Customer Update meeting](#) BPA solicited comments related to the Long-Term Available Transfer Capability (LT ATC) Metrics. Below are the questions posed by BPA, the customer comments submitted, and BPA's responses.

1. **Metric 1:** BPA interprets the data to indicate there is no discernable pattern to the differences between the Needs Assessment results and ATC values, which means there is no clear path to improving the ATC values to bring these into closer alignment with the Needs Assessment results.
 - Do you interpret this data differently? If so, how?
 - Is there additional information that may help inform your opinion? If so, what?

No specific comments were received in response to these questions, though one customer requested BPA continue dialogue with customers prior to making any decision on the LT ATC process.

BPA response: BPA will continue the dialogue with customers on this topic, which began in [August 2017 during the Pro-Forma/Industry Standard Gap Assessment \(PFGA\) workshops](#). Customers and stakeholders will have additional opportunities to provide feedback.

2. **Metric 2:** BPA believes the data indicates the study-based process is superior to the ATC values.
 - Do you agree? If not, why?

No specific comments were received in response to these questions, though one customer expressed the understanding that the Commercial Transmission Inventory Map (CTIM) uses LT ATC values to provide information, and LT ATC is only "part of the story for the likelihood of a transmission award."

BPA response: BPA would like to clarify that the CTIM uses Needs Assessment study results to provide information, rather than LT ATC. BPA agrees there are other components used in evaluating LT Transmission Service Requests (for example, sub-grid assessment).

3. **Metric 3:** Is there any insight you can provide on your use of the CTIM vs. "What-If" requests?

BPA received a comment that indicated the CTIM had allowed a customer to cease submission of "what if" requests, and that "you don't really know anything about the likelihood of a transmission award until the whole study process plays out."

BPA response: BPA is pleased to hear the CTIM is providing information that used to only be available via submission of a "what if" request. BPA further agrees the study-based processes provide a much clearer picture than LT ATC of the ability to award LT Transmission Service Requests as well as additional insights regarding any transmission infrastructure projects that may be required.

4. **Metric 4:** Is there additional CFS data to help you interpret the quality of BPA’s Conditional Firm service and/or the likelihood of accepting a CFS offer?

BPA received a comment that indicated a belief “that curtailments are rare, and that CFS ends up being pretty much the same as LTF in actual practice,” but went on to express that “PPAs offered by IOUs in the northwest still require LTF as a required condition. If CFS really does amount to almost the same thing as LTF in practice, then this requirement is not reasonable or necessary.”

BPA response: BPA appreciates these comments and encourages customer and stakeholder participation in efforts to refine BPA’s CFS offerings and meet the increasing market demand(s).