Version 2 updates Section C.1: Updated to reflect BPA’s decision to extend the firm reservation submission window for monthly service from 60 days to 1 year for NT and PTP.
Simultaneous Submission Window Processing

Version 23

In Order No. 890, FERC required Transmission Providers that establish “no earlier than” time frames for submitting firm PTP Transmission Service Requests (TSRs) to treat those TSR requests received within a specified time period at the beginning of the time frame as having been received simultaneously. Bonneville Power Administration (BPA) has adopted “no earlier than” time frames for its Short-Term Firm Transmission service products and, as described herein, has developed and implemented a simultaneous submission window for these products.

BPA Policy Reference

- Open Access Transmission Tariff (OATT): Section 13.2

For more information, visit the BPA Transmission Business Practices webpage or submit questions to techforum@bpa.gov.

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A. Application of BPA’s Simultaneous Submission Window

Application

1. A simultaneous submission window will apply to Original and Redirect TSRs for the following types of Firm transmission service:
   a. F-Hourly PTP
   b. STF-Daily PTP
   c. STF-Weekly PTP
   d. STF-Monthly PTP
   e. F-Daily Loss Returns
   f. F-Hourly Loss Returns
2. A simultaneous submission window will not apply to requestTSRs for Long-Term Firm transmission service, Network Integration (NT) Transmission Service, or Non-Firm transmission service. 
   
   a. Reservation priority of NT Service requestTSRs will be honored through the Short-Term Preemption and Competition ROFR process. 

3. A simultaneous submission window will also not apply to Consolidation, Deferral, Matching, Reassignment (Resale), Recall, Relinquish and Renewal requestTSRs. 

4. BPA will treat eligible Firm requestTSRs with otherwise equal reservation priority (priority based on service duration, pre-confirmed status, and bid price under Section 13.2 of the BPA OATT’s Tariff) and received within the first five (5) minutes of the reservation time frame opening as having the same queue time. BPA will use a lottery methodology to allocate available capacity among requestTSRs with otherwise equal reservation priority submitted within this simultaneous submission window. 

5. RequestTSRs submitted outside of the simultaneous submission window will be processed based on queue time, first-come first-served basis, as set forth in Section 13.2 of the BPA OATT’s Tariff. 

6. For applicable markets, the Short-Term Preemption and Competition ROFR process will be in effect from the opening of the reservation window, including the first five (5) minutes. 

B. Capacity Allocation for Eligible RequestTSRs Submitted Within Window 

1. For eligible requestTSRs submitted within the five- (5) minute reservation window, BPA will allocate available capacity pursuant to Section 13.2(ii) of the BPA OATT’s Tariff using the following priorities: 
   
   a. Service duration (longer duration requestTSRs receive priority over shorter duration requestTSRs); 
   
   b. Pre-confirmed status (pre-confirmed requestTSRs receive priority over non-preconfirmed requestTSRs of equal duration); 
   
   c. Bid price (higher bid price requestTSRs receive priority over lower bid price requestTSRs. This applies only if BPA offers discounts on transmission service under the BPA OATT’s Tariff); 
   
   d. Lottery allocation: (Explained further in Section D below.) 

C. Simultaneous Submission Window Duration & Treatment of RequestTSRs Received Within Window 

1. The simultaneous submission window opens at the beginning of the reservation window for the types of eligible Firm transmission service identified above in Section A and closes five (5) minutes thereafter, as set forth in the following table below.
2. All applicable simultaneously submitted requestTSRs submitted within a simultaneous submission window are masked on OASIS until the window closes.

3. RequestTSRs submitted within the simultaneous submission window and that are eligible for the lottery allocation will be processed upon the closure of the window. The effective queue time for awarding capacity under the lottery allocation will be the close of the window (XX:05).

D. Lottery Allocation Methodology

1. For requestTSRs submitted within the simultaneous submission window, if, after prioritizing by duration, pre-confirmation status, and bid price, there are multiple Customers with requestTSRs equal in priority, BPA will allocate available capacity based on a random lottery in the following manner:

   a. BPA will identify the list of all Customers that all have requestTSRs with equal priority.

   b. Based on the total number of Customers identified on the list, BPA will randomly assign a pick-order to each Customer. For example, if there are five different Customers with requestTSRs of equal priority, each Customer will be randomly assigned a pick order number from 1 to 5. That same pick order number will be used for all successive lottery rounds.

   c. BPA will run successive rounds of lotteries in which each Customer can have one (1) requestTSR considered in each per round until all eligible TSR's are there are no more requests to be processed.

   d. BPA will select Customers in the randomly-assigned order and offer available capacity to the first (next) of the selected Customer’s requestTSRs (based on the AREF number).

   e. BPA will make a full offer depending on the capacity available based on the Customer’s POR/POD or Source/Sink combination.

   f. If there is not sufficient capacity available to make a full offer, BPA will initiate the Short-Term Preemption and competition ROFR process pursuant to Section 13.2 of the BPA’s BPA Tariff OATT and its business practices.

   g. Once the Short-Term Preemption or competition ROFR process is complete, BPA will make an offer (full or counter-offer) of available capacity.
h. If there is no available capacity, BPA will set the TSR status to REFUSED the request.

i. Once BPA has processed one (1) request of each Customer in a round, it will repeat the lottery allocation process until all eligible requests have been processed. After the customer order is randomly determined via the lottery for the first round, that same order will be used for all successive rounds.

j.i. If one Customer submits multiple short-term request TSRs with equal priority and no other Customer submits request TSRs within the simultaneous submission window, the lottery allocation methodology will result in offering available capacity in order of AREF number.