

Simultaneous Submission Window Processing

BPA Transmission Business Practice

Version ~~2~~3

~~9/4/2016~~4/13/2022

~~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 ~~requests~~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 ~~request~~TSRs for Long-Term Firm ~~transmission service~~, Network ~~Integration (NT) Transmission (NT)Service~~, or Non-Firm transmission service.
 - a. Reservation ~~p~~priority of NT ~~Service request~~TSRs 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 ~~request~~TSRs.
4. BPA will treat eligible Firm ~~request~~TSRs with otherwise equal reservation priority (priority based on service duration, ~~p~~Pre-confirmation status, and bid price under ~~s~~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 ~~request~~TSRs with otherwise equal reservation priority submitted within this simultaneous ~~submission~~ window.
5. ~~Request~~TSRs submitted outside of the simultaneous submission window will be processed based on queue time, first-come first-served basis, as set forth in ~~S~~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 ~~Request~~TSRs Submitted Within Window

1. For eligible ~~request~~TSRs submitted within the five- (~~5~~) minute ~~reservation~~ window, BPA will allocate available capacity pursuant to ~~s~~Section 13.2(ii) of ~~the BPA OATT's Tariff~~ using the following priorities:
 - a. Service duration (~~L~~onger duration ~~request~~TSRs receive priority over shorter duration ~~request~~TSRs);
 - b. Pre-confirmation status (~~p~~re-confirmed ~~request~~TSRs receive priority over non-~~p~~reconfirmed ~~request~~TSRs of equal duration);
 - c. Bid price (~~H~~igher bid price ~~request~~TSRs receive priority over lower bid price ~~request~~TSRs. — This applies only if BPA offers discounts on transmission service under ~~the BPA OATT's Tariff~~);
 - d. Lottery allocation: (~~Explained further in s~~Section D ~~below~~.)

C. Simultaneous Submission Window Duration & Treatment of ~~Request~~TSRs 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~~.

| Firm Product | Simultaneous Window Opens | Simultaneous Window Closes | For Service Starting In |
|---|---------------------------|----------------------------|-------------------------|
| Monthly PTP | 00:00 | 00:05 | 365 days |
| Weekly PTP | 00:00 | 00:05 | 14 days |
| Daily PTP (including Daily and Hourly Loss Returns) | 00:00 | 00:05 | 7 days |
| Hourly PTP (including Hourly Loss Returns) | 09:00 | 09:05 | WECC Pre-schedule day |

2. All ~~applicable simultaneously submitted request~~ TSRs submitted within a ~~these simultaneous submission~~ window are masked on OASIS until the window closes.
3. ~~Request~~ TSRs 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 ~~request~~ TSRs submitted within the simultaneous submission window, if, after prioritizing by duration, ~~pre-confirmation~~ status, and bid price, there are multiple Customers with ~~request~~ TSRs 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 ~~request~~ TSRs 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 ~~5~~ five different ~~e~~ Customers with ~~request~~ TSRs of equal priority, each ~~e~~ 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 ~~a~~ each Customer can have one (1) ~~request~~ TSR 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 ~~request~~ TSRs (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 ~~s~~ 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 requestTSRs with equal priority and no other Customer submits requestTSRs within the simultaneous submission window, the lottery allocation methodology will result in offering available capacity in order of AREF number.