Response to Customer Comments – TSR Study and Expansion Process

BPA Transmission Business Practice

Version 6
Posted 8/11/2021
A. Opatrny Consulting, Inc.

Greetings:
After reviewing the proposed changes to the Business Practice entitled, TSR Study and Evaluation Process, Version 6, I have the following questions:

(1) Should this be the “TSR Study and Expansion Process”? Or, is BPA proposing to change the title of this Business Practice?

BPA Response 1
BPA appreciates Opatrny’s title comment and the link titled TSR Study and Evaluation Process has been corrected to reflect the correct title of TSR Study and Expansion Process. BPA is not proposing to change the business practice title.

(2) The proposed addition of Section I., entitled Previously Studied TSRs Approaching the Requested Stop Date contains referenced materials that are not adequately identified. This section, i.e., I.5.a. and I.8.a. and b. reference “Section J.1.”, “Section K.1.”, and “Section K.1.c”, however it is not clear as to which document or procedures these sections refer. Would BPA please clarify these references? Further, if these referenced materials raise concerns then maybe BPA should repost its proposal.

BPA Response 2
BPA appreciates Opatrny’s comment and the references have been updated in the final version of the business practice from Section J.1, Section K.1, and Section K.1.c to Section I.4, I.7, and I.7.c. BPA had determined that additional time for comment is not needed, as the corrections refer to the applicable information already provided in Section I.
B. Powerex

Powerex has observed that Sections I.5(a) and I.8(a) contain references to Section J.1 and Section K.1 (noted below) that do not exist in the Business Practice. It is unclear if there are additional requirements that need to be included in this business practice or if those requirements are listed in another business practice. It would be helpful if Bonneville could clarify and repost the correct references.

“5. The Customer must submit a follow-on Original TSR at least one (1) year prior to the Stop Date of the Initial Original TSR in order to retain the queue time of the Initial Original TSR.
   a. BPA will permit the submittal of a follow-on Original TSR after the one (1) year deadline if the follow-on Original TSR is submitted within 10 Business Days of the date that the Customer’s Original TSR first meets the requirements listed in Section J.1”

“8. The Customer must submit a follow-on Redirect TSR at least one (1) year prior to the Stop Date of the Initial Redirect TSR in order to retain the queue time of the Initial Redirect TSR.
   a. BPA will permit the submittal of a follow-on Redirect TSR after the one (1) year deadline if the follow-on Redirect TSR is submitted within 10 Business Days of the date that the Customer’s Redirect TSR first meets the requirements listed in Section K.1.”

BPA Response 3
BPA appreciates Powerex’s comment and the references have been updated per BPA Response 2.