



techforum@bpa.gov

NIPPC and RNW Comments on Proposed Changes to Deferral of Transmission Service Business Practice

NIPPC and RNW offer the following comments on the Customer Proposal to amend the Deferral of Transmission Service Business Practice. NIPPC and RNW object to the proposed amendment to the Deferral of Transmission Service Business Practice on both technical and policy grounds. At its core, the proposal raises the question of how many elements of a transmission service request can a customer change at the same time without losing the queue priority of the original request.¹

BPA explained during the call with customers on June 30, 2026 the basis for our technical objections. The NAESB standards which form the basis of the current OASIS programming never contemplated that a transmission customer would attempt to perform a redirect while a transmission request was in deferral status. Accordingly, the current functionality of OASIS does not support the proposed business practice amendment. We understand that the only way BPA could implement the customer proposal would be to use a manual process to change the customer's request – and that this manual mechanism was intended to correct errors and not to be used in the normal course of processing transmission service requests. NIPPC and RNW do not support the application of a manual error correction process as a work around to implement business practice changes that are inconsistent with the NAESB standards. NIPPC and RNW are also concerned about the increased workload on BPA staff that might result from manual processing of changes to transmission service requests outside of those changes supported by OASIS.

NIPPC and RNW also object to the proposal on policy grounds. The core components of a transmission service request are the service commencement date, the point of receipt ("POR"), the point of delivery ("POD"), and the quantity. Under the customer proposal, a customer would be allowed to change the POR, the POD (or both), during

¹ The question is similar to the famous thought problem -- the "Ship of Theseus". In ancient times, the people of Athens would commemorate Theseus' rescue of the children of Athens from Crete by sailing his ship on an annual pilgrimage to Delos to honor the god Apollo. Over time, regular maintenance and repairs resulted in nearly all of the ship's timbers being replaced. Greek philosophers posed the question: How many of the ship's timbers can be replaced before the ship is no longer the ship that Theseus sailed from Crete? NIPPC and RNW do not take a position on this question.

the time that the customer's request is in deferral status. The only element of the original request that would not change would appear to be the quantity.² NIPPC and RNW recognize that customers have a process to change the service commencement date of a request without losing their queue priority (through the deferral of service business practice). We also recognize that customers can change the POR, the POD, or both without losing their queue priority (through the redirect of transmission service business practice). Our position, however, is that a customer should not retain its original queue priority when it attempts to change its POR, POD, or both while the customer's request is in deferral status. We believe that a customer should not be allowed to jump the queue by retaining a transmission service request's original queue priority when submitting a redirect request that shares so few of the attributes of the original request.

NIPPC and RNW also note that BPA and customers are currently engaged in TC-27 which will substantially change how transmission service is awarded on an interim basis. We are concerned that implementing the proposed business practice change will have unknown or unintended consequences in the interim process under consideration in TC-27. One potential implication of adopting this customer proposal is that customers with requests in deferral status will attempt to redirect those requests to different POR/POD combinations where BPA may be able to offer new conditional firm service as it identifies and relieves constraints on conditional firm service. In this case, these customers would effectively move ahead of customers whose requests have not yet been studied but who will be funding the proposed conditional firm service analysis in the hopes that they will receive conditional firm service.

² NIPPC does not take the time to explore the implications of business practices related to partial offers and remainder requests which might allow the customer to change the initial quantity as well.