

Real Power Loss Return

BPA Transmission Business Practice

Version 16

10/1/2021

Real Power Loss Return

Version 16

This business practice defines the process and guidelines for Customers who must return Real Power Losses to the Bonneville Power Administration (BPA).

BPA Policy References

- [Open Access Transmission Tariff \(OATT\)](#): Section 15.7; 28.5; Schedule 11; Attachment Q
- [Transmission Rate Schedules/Provisions](#): Section II.J; II.K

See the Energy Imbalance Market (EIM) Business Practice for information on Real Power Losses associated with the EIM Transfers.

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

Table of Contents

A. General Criteria.....	1
B. Loss Reconciliations.....	5
C. Loss Return Requirements.....	5
D. Financial For Inaccuracy (FFI) Penalty Charge Calculation.....	7
E. Requesting Waiver or Reduction of FFI Penalty Charges.....	7

A. General Criteria

1. All Point-to-Point (PTP), Network Integration (NT), and Formula Power Transmission (FPT) Customers are required to return Real Power Losses using firm transmission on the Network segment of the Federal Columbia River Transmission System (Network), with the following exceptions:
 - a. If a Customer purchases the same firm or nonfirm product on the Network to or from John Day and then over the Malin 230/Hilltop 345 path, BPA will charge a single Network use of the Network paths.
 - b. Customers who are Power Services’ Regional Dialogue contract holders who have elected the Load-Following or Block products will have transmission losses included as part of their power sales contract for the Customer’s Net Requirement power purchase from BPA.
 - i. The Customer must return Real Power Losses and follow the requirements in this business practice for the non-Federal portion of their

power delivery and delivery of the Slice portion of their Slice/Block product, as applicable.

- c. Customers with resources that are delivered to their load without using the BPA transmission system will not be required to return losses. An example is a generator behind the meter where all the output is used to serve load on the customer's side of the meter.
 - d. Montana Intertie: Customers have responsibility to the control area operator of the Montana Intertie for all Real Power Losses incurred across the Montana Intertie and shall be responsible for making arrangements with the control area operator for the return of such losses. BPA is neither the BA operator nor the loss provider for the Montana Intertie.
 - e. Customers will not be assessed losses for the following uses of the BPA transmission system:
 - i. Self Supply or Third Party Supply of Operating Reserves
 - ii. Self Supply or Third Party Supply of Balancing Reserves
 - iii. Schedules utilized for Bilateral Redispatch for Congestion Management
 - f. Customers will not be assessed losses for loss return e-tags referencing a loss return Product Suffix Code.
2. Customers may elect only one of the following Real Power Loss Return Services:
- a. In-Kind: the Customer, or a designated Loss Provider, must return Real Power Losses as in-kind power 168 hours after the Real Power Loss obligation is incurred.
 - i. In the event the Customer designates a third-party Loss Provider, it is the Customer who is ultimately responsible for meeting the Real Power Loss obligation, including any associated charges or penalties under the Transmission, Ancillary, and Control Area Rate Schedules.
 - b. Financial: the Customer purchases Real Power Losses from BPA Power Services consistent with the current Power Rates Schedules and General Rate Schedule Provisions.
 - i. Customers must contact a Trader from BPA Power Services at bpamarketing@bpa.gov or 503-230-4111 to arrange for purchase of Real Power Losses from BPA Power Services.
 - ii. Customers electing Financial Loss Return Service are billed monthly on their transmission bill.
 - c. Slice Output: Customers with a Regional Dialogue Slice/Block power sales agreement may return Real Power Losses by adjusting the Customer's Slice Output Energy schedule during the like hour occurring 168 hours after the Real Power Loss obligation is incurred.
3. A new Customer must designate a Real Power Loss Return Service (Financial, In-Kind, or Slice Output) for returning Real Power Losses by completing the Notification of Real Power Loss Return Service form and emailing the form to RPLPForm@bpa.gov and its assigned Transmission Account Executive. The form must be submitted no later than when the Customer submits their Application package as part of the New Customer Application Process.

4. Customer may not change its Real Power Loss Return Service within a fiscal year, but may modify the Real Power Loss Return Service election for the upcoming fiscal year by providing an updated Notification of Real Power Loss Return Service form by August 31st, or the next Business Day, prior to the start of the next fiscal year. To change Real Power Loss Return Service election, the Customers must complete all applicable items on the Notification of Real Power Loss Return Service form and email to: RPLPForm@bpa.gov.
5. Customers who elect In-Kind Loss Return Service must submit an updated Notification of Real Power Loss Return Service form when there are any changes to the Loss Provider information on the form 30 days prior to the change.
 - a. Ahead of the 30 day window any third party Loss Provider must fill out appropriate forms to gain access to the CDE system, as required by the Customer Data Entry Business Practice.
6. Existing Customers who are currently operating under the Financial Loss Return Service and who do not intend to change their Financial Loss Return Service election do not need to submit an updated Notification of Real Power Loss Return Service form.
 - a. In order for the Customer to qualify to operate under the Financial Loss Return service, the Customer will need to execute any appropriate agreements with BPA Power Services for purchase of Real Power Losses prior to the start of the next fiscal year.
7. A Customer who fails to submit an election of Real Power Loss Return Service or Customers who fail to renew their agreements with BPA Power Services as required for Financial Loss Return Service, will default to an In-Kind Loss Return Service election for the remainder of that applicable fiscal year. The Customer will be subject to the applicable Transmission, Ancillary, and Control Area Rate Schedules, including the Financial for Inaccuracy (FFI) Penalty Charge.
 - a. A Customer wishing to continue their Financial Loss Return Service election, but failed to execute any necessary agreements to purchase Real Power Losses from BPA Power Services, may contact their assigned Transmission Account Executive and notify them of the mistake. Upon notification, BPA may work with the Customer to move them to Financial Loss Return Service.
 - i. During the interim period, the Customer is assumed to have elected In-Kind Loss Return Service and is subject to the associated penalties under the Transmission, Ancillary, and Control Area rate schedules.
8. A third-party Loss Provider who is also a BPA Power Services' Regional Dialogue Slice/Block Customer may supply losses from Slice Output.
9. BPA may refuse requests for service or restrict a Customer's ability to schedule transmission for Customers that have not submitted a properly completed Notification of Real Power Loss Return Service form designating a Real Power Loss Return Service (In-Kind, Financial or Slice Output) including required loss provider information.
10. In-Kind Real Power Loss Returns must be from a Customer designated control area, a system, or a generator interconnected with the Network segment.
 - a. If a generator is down for any reason, the Customer must continue to deliver energy either by scheduling an alternative Source back through that generator, or from another provider, tagged to BPALOSS (SINK) to ensure that In-Kind losses are returned as scheduled.

- b. A Customer's failure to return Real Power Losses will be subject to the FFI Penalty Charge as described in the current Transmission, Ancillary, and Control Area rate schedules.
11. A Customer may elect to be its own In-Kind Real Power Loss Provider if it has its own generation and is interconnected with the Network segment.
12. BPA will assess an Unauthorized Increase Charge, as described in its current [Rate Schedules](#), or its successor, if the Customer schedules transmission in excess of its Reserved Capacity to return Real Power Losses.
13. The Customer may elect to purchase Hourly Firm transmission for Real Power Loss Returns during Preschedule.
14. Real Power Loss Returns cannot be scheduled concurrently on e-Tags. BPA will deny tags that include concurrent losses for BPAT segments.
15. Real Power Loss Returns must be returned in whole MWs.
16. On the business day before the WECC preschedule day, BPA will calculate, and post on the Customer Data Entry (CDE) system, the Total Obligation, the hourly Real Power Losses owed by Customers electing In-Kind, and Slice Output Loss Return Services. The Real Power Losses will be calculated for return 168 hours after the Customers' original use of transmission service.
 - a. When calculating the hourly Real Power Losses, any kilowatt remainder above a whole MW is carried forward to the next hour and added to that next hour's calculated hourly Real Power Loss obligation.
 - b. BPA may recalculate the hourly Real Power Losses after the business day in which the obligations are posted to CDE to account for any changes that may have occurred after the Real Power Losses were calculated and posted. Any difference in the amount of Real Power Losses resulting from the recalculation will be accounted for in the Real Power Losses calculated in a future like hour and day.
17. A single loss obligation is calculated for each Service Agreement based on:
 - a. E-Tags.
 - b. Actual or other data that references the Service Agreement.
18. Loss obligations for an FPT Customer are calculated as described in their FPT contract.
19. Customers and third party Loss Providers that return losses for In-Kind and Slice Output returns must use the CDE system to access Their Real Power Loss obligations.
20. In order to gain access to the CDE system, Customers and third party Loss Providers must follow the requirements in the Customer Data Entry Business Practice.
 - a. Customers who have more than one authorized third party Loss Provider for viewing loss data and reports must coordinate and elect which party is responsible for returning all the loss obligations.
21. The Real Power Loss obligations can be accessed using either:
 - a. CDE interface, or
 - b. Extensible Markup Language (XML) interface.

- c. For technical assistance to access data using XML, send an email to txcbs@bpa.gov

B. Loss Reconciliations

1. At the end of each Delivery Month, after BPA has balanced with WECC, BPA will work with the Customer to identify and reconcile any difference between losses incurred and losses returned resulting from changes made to schedules or actual data. Adjustment records for reconciliation of losses are available to the Customer in its Daily Loss Report available via CDE.
2. BPA will provide notice to Customers through txcbs@bpa.gov email when loss reconciliation has been finalized for a Delivery Month. BPA and the Customer, however, may agree to adjust final reconciled losses if, within three years, either party discovers a reconciliation error resulting from source data errors (e.g., meters, tags, loss database) programming errors, or other clear error. Any errors of this type must be corroborated by data from both BPA and the Customer.

C. Loss Return Requirements

1. All Short-Term Firm (STF) Transmission Service Requests (TSRs), including requests to return losses, will be processed in queue order.
2. Requests to return losses will not be subject to competition.
3. Available Flowgate Capability (AFC)/Available Transfer Capability (ATC)
 - a. New Reservations to return losses affecting external interconnections or interties may be REFUSED due to lack of ATC. If REFUSED, Customers are expected to return their Real Power Loss obligations.
 - b. Requests to return losses not affecting external interconnections or interties will be ACCEPTED, regardless of AFC.
4. A Customer, or its alternate Real Power Loss Provider, must return In- Kind Real Power Losses on firm transmission by one of the following reservation procedures:
 - a. No Charge Reservation:
 - i. To reserve No Charge Reservations in OASIS, go to the Reservation Summary screen and select "F-Daily Loss Return" or "F-Hourly Loss Return" service.
 - ii. If the Customer does not want to access OASIS to reserve No Charge Reservation, they will need to arrange to have another entity do business for them as their Reservation Agent. Refer to the Reservation Agent Business Practice for details.
 - iii. For submittal timelines for the No Charge Reservations see the Requesting Transmission Service Business Practice.
 - b. CONFIRMED No-Charge Reservations to return losses will increment (or decrement) posted ATC and AFC.
 - c. Previously reserved firm transmission.

- d. Hourly Firm Service purchased at Preschedule.
5. To return In-Kind Losses the following criteria must be met:
 - a. The No Charge Reservation must show the POR as the Real Power Loss Provider and BPAPOWER as the Point of Delivery (POD).
 - b. Customers shall return losses by submitting e-Tags during the Preschedule window that matches the hourly MW profile from Customer Data Entry (CDE).
 - c. All In-Kind Real Power Loss Return service e-Tags must be submitted for the WECC Preschedule Day no later than 15:00:00 PPT.
 - d. If the associated Real Power Loss Return schedule specifies the same Network Point of Receipt (POR) as the Service Agreement under which the losses were incurred, the Customer may return remaining losses under the same Service Agreement on unused firm Reserved Capacity.
 - e. Unused Reserved Capacity on the Southern Intertie under the Customer's Service Agreement must not be used for In-Kind Loss Return.
6. If Firm Reserved Capacity (ATC) is insufficient for a Customer to obtain a full reservation to return losses, BPA will offer Partial Service.
7. The OASIS Reference field of the e-Tag must reference either the:
 - a. AREF of the No Charge Reservation request for a loss return. The Sale Ref of the No Charge Reservation must be the same as the Customer's Service Agreement for which losses are being returned; or
 - b. The Customer's Service Agreement under which the losses were incurred.
8. Customers must reference the appropriate Product Suffix Code on the e- Tag:
 - a. Point-to-Point Service Agreement – LP
 - b. Network Integration Service Agreement – L3
 - c. Formula Power Transmission contract – L2
 - d. Southern Intertie owners and Non-Federal participant's (NFP) – L7
 - e. Northern Intertie owners - L9
9. The e-Tag must have BPAPOWER as the POD and BPALOSS as the sink.
10. Real Power Loss Return schedules are firm and subject to pro rata curtailment, except as provided in the Oversupply Management Protocol business practice section E.2, in real time.
 - a. BPA will add any Real Power Loss Returns that are curtailed to the Real Power Losses calculated in a future like hour and day, HLH or LLH, to be returned by the Customer.
11. Slice Loss Return
 - a. Power Services' Regional Dialogue Slice/Block Customers are not required to submit a No Charge Reservation when using Slice Output to provide Real Power Loss Returns. Losses returned by Slice Output Losses Return Type are deducted from the Customer's share of Slice Output 168 hours after service was provided, prior to making the share available for scheduling.

D. Financial For Inaccuracy (FFI) Penalty Charge Calculation

1. A FFI Penalty Charge as set forth in the Transmission Rate Schedules will be issued on the transmission bill when a schedule or schedules for the return of a Customer's Real Power Losses are not returned 168 hours from when the Real Power Loss obligation was incurred or are different than the Real Power Losses calculated and posted as the Total Obligation in the CDE system by BPA as described in Section A.17 above.
2. For any hour in which Real Power Losses have been waived under the Oversupply Management Protocol Business Practice, Section E.2, the Customer will not be subject to the FFI Penalty Charge unless the Customer returns Real Power Losses in that hour.
3. In the event that Real Power Losses are curtailed due to a reliability event, Customers will be subject to the FFI Penalty Charge if they do not appropriately return the Real Power Losses Returns curtailed and added to a future like hour, as described in Section C.10 above.

E. Requesting Waiver or Reduction of FFI Penalty Charges

1. A written request for a waiver or reduction of a FFI Penalty Charge may be submitted to the Customer's assigned Transmission Account Executive. The request must include all of the information necessary to demonstrate that it satisfies the criteria for a waiver or reduction as described in section II.J of the [Transmission Rate Schedules](#).
2. The Customer should make best efforts to submit a written request for a waiver to its assigned Transmission Account Executive within 60 Calendar Days after receipt of the transmission bill with the FFI Penalty Charge. Upon receipt of a waiver request, BPA will evaluate and decide whether to grant the waiver within 60 Calendar Days.
3. If a waiver or reduction is granted, BPA Customer Billing will issue the Customer an appropriate credit as soon as practicable.