

BONNEVILLE POWER ADMINISTRATION

Preemption and ROFR User Guide

Version 1.4 3/15/2023

This is a guide for using OASIS to manage Preemption and Right of First Refusal (ROFR) for Short-Term TSRs and reservations. This describes the OASIS actions for the policies set forth in the <u>Preemption of Short-Term Requests and Reservations</u> <u>business practice</u>. The document contains proprietary screenshots for the Preemption and Competition Module (PCM) from Open Access Technology International (OATI). Do not distribute this material or use it outside the context of this document without specific authorization from OATI.

For additional assistance, submit questions to tblresdesk@bpa.gov.

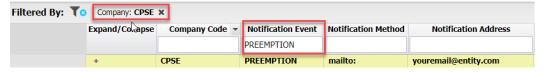
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A. Subscribing to PCM Email Notifications

OASIS sends emails to provide notification of status updates for Challengers, Defenders, and Dependents (i.e., Resales and pending Redirects of a Defender) throughout the Preemption and ROFR process. Users can subscribe themselves to the PCM notifications as follows on OASIS.

- 1. Access OASIS > Admin > Notification.
- 2. Search for an existing notification record. Filter by 'Company' = your 4 character company code and 'Notification Event' = PREEMPTION.



- 3. If a record exists, double-click that record to open the Update Notification panel. If no record already exists, create a new notification record by clicking the 'Add New' icon in the upper right corner.
- 4. Update or populate the notification record with valid email addresses. Ensure 'Notification Event' = PREEMPTION and 'Enabled' flag is checked.
- 5. Save changes using the button in the upper right corner.



6. Refer to OASIS online Help or the Supplemental OASIS User Guide on the Customer Training site for more information on OASIS Notifications.

B. Subscribing to the PCM alarms

There are three alarms that are relevant for PCM. First, OASIS will trigger the Competing Request alarm on OASIS when PCM identifies a TSR or reservation as a participant at the beginning of a new Preemption and ROFR process. Subscribe to this PCM alarm as follows on OASIS:

- 1. Access OASIS > My Settings > Alarm Settings.
- 2. Find the alarm "Competing Request" under the OASIS Alarms grouping.
- 3. Select acknowledgement type: Soft or Hard. A 'Hard' alarm requires specific acknowledgement. A 'Soft' alarm does not.



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- 4. Optionally: Check the 'Sound' checkbox to hear an audible alert when the alarm is triggered.
- 5. Do not check the 'Email' checkbox for the Competing Request alarm. Subscribe to the PCM email notification in section A instead.
- 6. The second alarm is not specific to PCM, but it is important to users of PCM. It is an alarm that will trigger when capacity is recalled from a reservation through a RECALL reservation. PCM uses a RECALL when it preempts capacity from most Defenders. Find the alarm "New RECALL TSR" under the OASIS Alarms grouping and subscribe using the same steps as above.



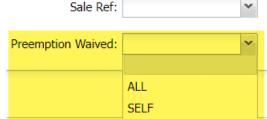
7. The third alarm is also not specific to PCM, but it is also used by PCM when capacity is preempted. Specifically, when PCM preempts capacity from a Short-Term Firm Redirect that was CONFIRMED on OASIS after its parent's Unconditional Time, that capacity is restored back to the unconditional parent through a Firm RELINQUISH transaction on OASIS. Subscribe to the alarm "New RELINQUISH TSR" under the OASIS Alarms group to be notified of this OASIS action.



8. Save all alarm changes using the button in the upper right corner $\ensuremath{\checkmark}$.

C. Waiving the right to challenge under PCM

- 1. The election to waive the right to challenge is done at the time the TSR is submitted on OASIS. Customers cannot change this election once made for a given TSR.
- 2. On the New TSR screen under the References/Comments/Notifications section, populate the 'Preemption Waived' field to waive the right to challenge.
 - a. ALL: Waives <u>all</u> rights to challenge. An offer to a Customer will not use PCM, but will only consider capacity that is available from ATC.



b. SELF: Waives the right to challenge a Customer's own TSRs or reservations. The Preemption and ROFR process will <u>not</u> proceed if

PCM identifies one of the Customer's own TSRs or reservations as a Defender.

3. Leave the 'Preemption Waived' field blank to have PCM initiate the Preemption and ROFR process to consider all potential Defenders.

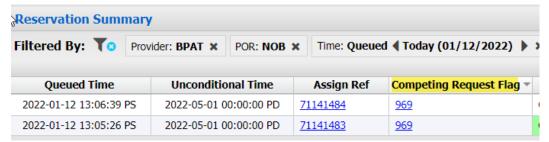
D. Identifying an active Preemption and ROFR Process

There are a number of ways to tell when PCM initiates a new Preemption and ROFR process.

- 1. PCM assigns a unique reference number called the 'Preemption Ref' to each new Preemption and ROFR process. The 'Preemption Ref' will be the same for the Challenger, all Defenders, and any Dependents of the Defenders for a given Preemption and ROFR process.
- 2. Next, PCM will set the 'Competing Request Flag' on an AREF when a Preemption and ROFR process is in progress for that AREF. The 'Competing Request Flag' will be set to the 'Preemption Ref' for the Challenger, all Defenders, and any Dependents of the Defender.
- 3. The 'Competing Request Flag' is visible on OASIS as follows:
 - a. On the 'Transmission Reservation Detail' screen under the Additional Information section for an AREF; or



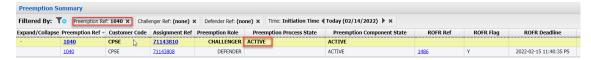
b. As a column on the Transactions > Reservation Summary screen.



4. PCM will trigger the Competing Request alarm on OASIS (from section B) when the 'Competing Request Flag' is set for any TSR or reservation.

- PCM will also send an email notification (from section A) for any TSR or reservation involved in the Preemption and ROFR process. The email indicates the 'Preemption Ref' assigned by PCM.
- 6. The 'Preemption Ref' can be used to look up the status of the Preemption and ROFR process on OASIS.
 - a. Transactions > Preemption Summary.
 - b. Filter by 'Preemption Ref' or 'Challenger Ref' or 'Defender Ref'.

Tip: Use the Column Configuration icon ____ to setup your columns as shown below to see the most relevant fields.



- Preemption Process State = ACTIVE for any Preemption and ROFR process that is in progress.
- d. Tip: Refer to OATI webHelp in OASIS for more information on the Preemption Summary display.

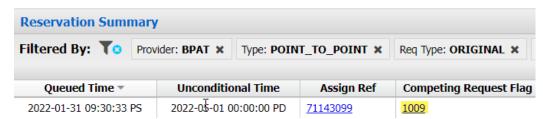
E. Viewing Preemption Details

The Preemption Detail screen shows information for a specific Preemption and ROFR process (identified by the 'Preemption Ref' discussed in section D).

- The Preemption Detail screen can be opened by clicking on the 'Preemption Ref' hyperlink on OASIS as follows:
 - a. From the 'Competing Request Flag' on the Transmission Reservation

 Detail screen; or

 Additional Information
 - From the 'Competing Request Flag' column on the screen Transactions > Reservation Summary; or

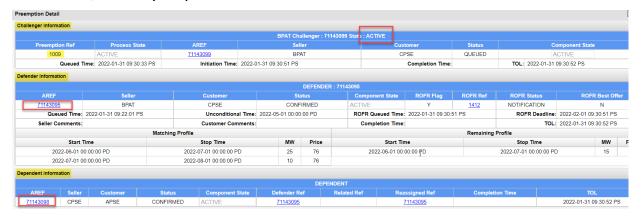


Competing Request Flag: 1009

c. From the screen Transactions > Preemption Summary.



2. The Preemption Detail screen shows the Challenger, all identified Defenders, and any Dependents of all Defenders.

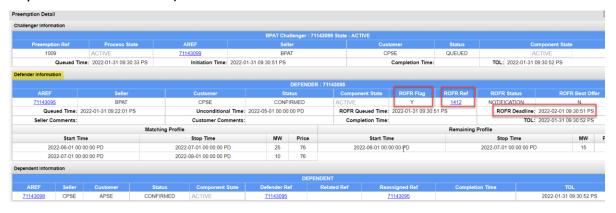


- a. The status of the overall Preemption and ROFR process is displayed at the top of the screen as either ACTIVE (currently in progress) or COMPLETED.
- b. The Defender Information section will list all Defenders that have been identified, both those with and without ROFR.
- c. The Dependent Information section will list all Resales and pending Redirects of all identified Defenders.
- d. Tip: Refer to OATI webHelp in OASIS for more information on the Preemption Detail display.

F. How to know if you have Right of First Refusal (ROFR)

All Customers who have ROFR for a given Preemption and ROFR process will be notified simultaneously through a ROFR Notification posted on OASIS.

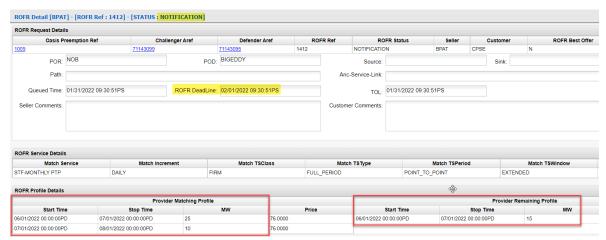
- 1. The 'Competing Request Flag' will be set to the 'Preemption Ref' for all defending AREFs with ROFR (as explained in section D).
- 2. Use the 'Preemption Ref' to open the Preemption Detail screen (as explained in section E).



- a. The 'ROFR Flag' will be set to "Y" for all Defender AREFs that have ROFR. A 'ROFR Flag' = "N" means that AREF does not have ROFR.
- b. The 'ROFR Ref' value is a unique reference number for the ROFR Notification for a given Defender.
- 3. To view a ROFR Notification:
 - a. Click the 'ROFR Ref' hyperlink from the Preemption Detail screen to open the ROFR Detail screen; or
 - b. Go to Transactions > ROFR Summary. Filter by the 'ROFR Ref' or the 'Defender Ref'. Then click the 'ROFR Ref' hyperlink to open the ROFR Detail screen.



4. The ROFR Detail screen shows the information necessary for a Customer to exercise ROFR. Tip: Refer to OATI webHelp in OASIS for more information.



- a. 'ROFR Deadline': This is the time by which a Customer must submit a valid ROFR request on OASIS in order to exercise ROFR.
- b. 'Provider Matching Profile': This is minimum profile necessary to match the terms and duration of the Challenger in order for a Customer to exercise ROFR.
- c. 'Provider Remaining Profile': This is the profile that would remain <u>after</u> the Defender AREF is preempted if:
 - i. The ROFR attempt is unsuccessful; or
 - ii. The Customer explicitly declines ROFR; or
 - iii. The Customer fails to submit a valid ROFR by the 'ROFR Deadline'.

G. Exercising ROFR with Defaults

When exercising ROFR, the Customer has the option to change the Matching and Remaining Profiles in various ways (described in sections H, I, J). However, the quickest method (and most likely to succeed) is to exercise ROFR using the default profiles from the ROFR Notification.

- 1. From either the Preemption Detail or ROFR Summary screens, open the ROFR Detail screen for the 'ROFR Ref' Notification as explained in section F.
- 2. Click the 'New ROFR' icon in the upper right corner of ROFR Detail.



3. This will open a new screen called ROFREntry which is used to exercise ROFR. The top of the ROFREntry screen displays the ROFR Notification.



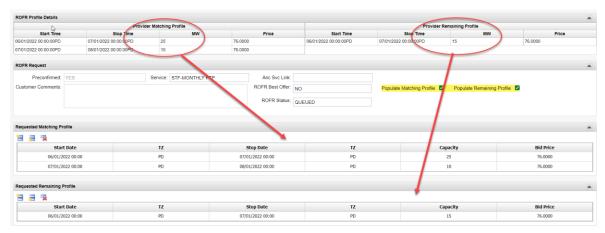
- 4. The bottom of the ROFREntry screen is the ROFR Request section. Make sure the Service field is populated to match the Service of the Challenger.
- Customers are required to populate both the 'Requested Matching Profile' and 'Requested Remaining Profile' fields.



6. The easiest way to populate these fields is to use the checkboxes 'Populate Matching Profile' and 'Populate Remaining Profile'.



7. This copies the default Matching and Remaining Profiles from the Provider Notification to the Requested profiles for the ROFR Request.



8. Now scroll back to the top of the ROFREntry screen. In the upper right corner, click the green 'Submit' button.



9. This sends the ROFR Request to BPA. A new 'ROFR Ref' is assigned.



10. Monitor this new ROFR request. On the ROFR Summary screen, filter for the 'Defender AREF' or the 'Preemption Ref' and monitor the 'ROFR Status'.

Tip: Use the Column Configuration icon to setup your columns as shown below to see the most relevant fields.



- a. INVALID: The ROFR request was not submitted correctly. Customers may try to exercise ROFR again. Open the original ROFR_Notification (e.g., 1412 in the example above) and repeat the steps in this section.
- b. VALID: The ROFR request was submitted correctly (e.g., 1414 above). BPA must still evaluate this Defender for a final status. Note: This evaluation can take up to 24 hours.
- c. MATCHED: ROFR was successfully exercised. This Defender has concluded participation in the Preemption and ROFR process (section L). Capacity has been added to the Defender reservation (section M).
- d. PREEMPTED: ROFR was not exercised. This Defender has concluded participation in the Preemption and ROFR process (section L). Capacity will be preempted from the Defender (section N).

H. Exercising ROFR by exceeding the Challenger Duration

When exercising ROFR, Customers may exceed the duration of the Challenger.

- 1. Open the ROFREntry screen for the 'ROFR Ref' as explained in section G.
- 2. Check the 'Populate Matching Profile' checkbox in the ROFR Request section. This populates the Requested Matching Profile with the <u>default</u> terms needed to match the Challenger.



- 3. Then to exceed the Challenger, change the Stop Date of the last profile row to the desired end date. Note: Do not change the Capacity fields.
- 4. Populate the Requested Remaining Profile. This may be the default Remaining Profile as explained in section G, or this can optionally be a lower Remaining Profile as explained in section I.
- 5. Verify the Service field is populated to match the Challenger.
- 6. Submit this ROFR request

 Monitor it on ROFR Summary as explained in section G.

I. Exercising ROFR by lowering the Remaining Profile

When exercising ROFR, Customers must populate the Requested Remaining Profile to indicate how much capacity should remain should the reservation be preempted. This can be the default Remaining Profile provided by BPA, or it may optionally be a lower profile (unless the Best Offer option is used from section J).

- 1. Open the ROFREntry screen for the 'ROFR Ref' as explained in section G.
- 2. Verify the Service field is populated to match the Challenger.
- 3. Populate Requested Matching Profile as explain in either section G or H.

- 4. Check the 'Populate Remaining Profile' checkbox in the ROFR Request section. This populates the Requested Remaining Profile with the <u>default</u> amount to be preempted.
- 5. Edit the Capacity field in the Requested Remaining Profile to any value that is lower than the default. Note: Do not change the start or stop dates.



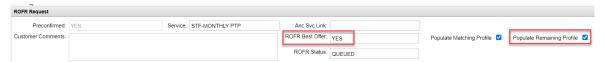
6. Submit this ROFR request

Monitor it on ROFR Summary as explained in section G.

J. Exercising ROFR with Best Offer

When exercising ROFR, Customers may request that they be considered for the best offer possible should their ROFR request be denied.

- 1. Open the ROFREntry screen for the 'ROFR Ref' as explained in section G.
- 2. Populate the Requested Matching Profile as explained in section G or H.
- 3. Check the 'Populate Remaining Profile' checkbox in the ROFR Request section. Do not edit these default Requested Remaining Profile values.
- 4. Change the ROFR Best Offer field to "YES".



- 5. Verify the Service field is populated to match the Challenger.
- 6. Submit this ROFR request . Monitor it on ROFR Summary as explain in section G.

K. Declining to exercise ROFR

Customers may explicitly decline to exercise ROFR on OASIS.

- 1. Open the ROFREntry screen for the 'ROFR Ref' as explained in section G.
- 2. Verify the Service field is populated.
- 3. Check the 'Populate Matching Profile' checkbox in the ROFR Request section to initially set the default Matching Profile.



4. Edit the Requested Matching Profile to change the Capacity values to zero.

- 5. Check the 'Populate Remaining Profile' checkbox in the ROFR Request section. Do not edit these default Requested Remaining Profile values.
- 6. Leave the ROFR Best Offer field as "NO".
- 7. Submit this ROFR request . Monitor it on ROFR Summary as explain in section G. The ROFR Status should be quickly set to PREEMPTED. If the ROFR Status is INVALID, try again.



8. By declining to exercise ROFR, this Defender AREF will immediately conclude participation in the Preemption and ROFR process (section L) and capacity will be immediately preempted from the Defender (section N).

L. Identifying a completed Preemption and ROFR Process

The Challenger and each Defender AREF(s) involved in the Preemption and ROFR process may complete the process at different times. The overall process is not complete until all AREFs involved are complete.

- 1. When a given AREF has completed its participation in the Preemption and ROFR process, the 'Competing Request Flag' will be changed back to blank.
 - a. This is visible on Transmission Reservation Detail.



b. It is also visible on Reservation Summary.

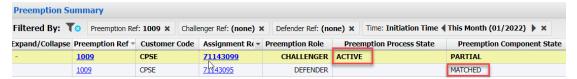


2. The completed 'Preemption Ref' is added to Seller comments.

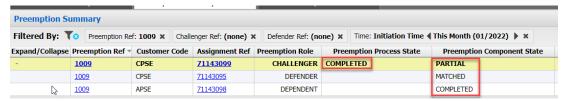


- 3. The overall status of the Preemption and ROFR process is noted by the 'Preemption Process State' on the Preemption Summary and Preemption Detail screens. Valid states are:
 - a. ACTIVE: The Preemption and ROFR process is currently in progress.
 - b. COMPLETED: The overall process is finished for <u>all</u> AREFs involved.
- 4. The individual status of the Challengers, each Defender, and any Dependents is noted by the 'Preemption Component State'. Valid states are:
 - a. ACTIVE: The Preemption and ROFR process is in progress for this AREF.
 - b. MATCHED: The Defender has successfully exercised ROFR.
 - c. PREEMPTED: The Defender has lost capacity through the Preemption and ROFR process. A RECALL has been issued on OASIS.
 - d. NOACTION: Pending Defender ended up not getting preempted.
 - e. FULL: Challenger has gotten a full offer through Preemption and ROFR.
 - f. PARTIAL: Challenger or Defender has gotten a Counteroffer. For a Challenger, this means not enough capacity was made available through the Preemption and ROFR process to grant a full offer. For a Defender, this means that a pending request was partially preempted.
 - g. COMPLETED: Generally used for Dependent AREFs to show that the Preemption and ROFR process has completed for their parent AREF.
- 5. Dependents will complete the Preemption and ROFR process at the same time as their parent Defender reservations. The 'Competing Request Flag' will be set to blank on all Dependents of a Defender.
- 6. If subscribed to PCM email notifications from section A, an email will be sent as soon as the 'Competing Request Flag' is cleared for each AREF and the Preemption and ROFR process is concluded for that AREF.
- 7. Examples:

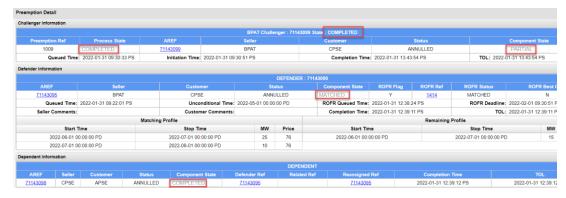
a. Preemption Summary for 'Preemption Ref' = 1009. The overall Preemption and ROFR process is still in progress, but the Defender has completed the process by successfully exercising ROFR.



b. Next, Preemption Summary shows the overall process has been COMPLETED for 'Preemption Ref' = 1009. The Challenger received a Counteroffer (PARTIAL). The Defender successfully exercised ROFR (MATCHED). The Dependent of that Defender is also completed.



c. Launch the Preemption Detail screen by clicking the 'Preemption Ref' hyperlink for 1009. This shows the final details of this particular Preemption and ROFR process for all participating AREFs.



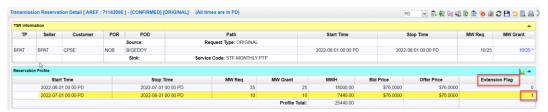
M. Gaining capacity through Preemption and ROFR

Defenders gain new capacity through the Preemption and ROFR process when they successfully exercise ROFR to match the terms of the Challenger.

- 1. A successful exercise of ROFR rights will be indicated as follows:
 - a. ROFR Summary will show 'ROFR Status' = MATCHED.



- b. Preemption Summary and Preemption Detail will also show 'Preemption Component State' = MATCHED.
- 2. When a ROFR is successfully exercised, new capacity is appended to the existing Defender reservation as a ROFR Extension. The Defender AREF does not change. Instead, the existing reservation is updated on OASIS to match the 'Requested Matching Profile' that was submitted on the ROFR request. This is visible on OASIS as follows:
 - a. On the Transmission Reservation Detail screen, the ROFR Extension will appear as a new row under the Reservation Profile section and will be marked by a non-zero value in the 'Extension Flag' column.



- i. 'Extension Flag' = "0" indicates the profile when the reservation was initially CONFIRMED on OASIS.
- ii. 'Extension Flag' = "1" indicates that this row was appended due to successfully exercising ROFR the first time.
- iii. If this reservation were challenged and successfully exercised ROFR a second time, another row would be appended and marked with 'Extension Flag' = "2". And so on.
- b. Under the Additional Information section, the 'Service Update Flag' will indicate how many times the Service Code was changed to meet the terms of the Challenger.
 - 'Service Update Flag' = "0" indicates the Service Code has not changed since the reservation was first CONFIRMED on OASIS.
 - ii. 'Service Update Flag' = "1" indicates the Service Code was changed once due to Preemption and ROFR. And so on.
- c. The 'Extension Flag' and 'Service Update Flag' are also visible as data fields when querying OASIS using the *transstatus* template.
 - i. From the Reservation Summary screen, use the 'Download CSV' option from the icon on the upper right menu.

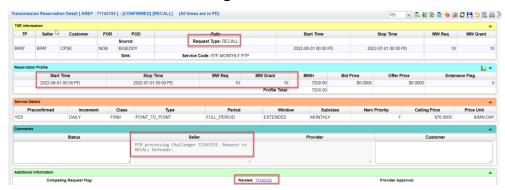


ii. The EXTENSION_FLAG and SERVICE_UPDATE_FLAG are the last columns in the *transstatus* output.

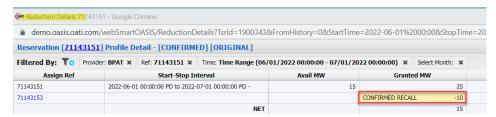
N. Losing capacity through Preemption and ROFR

Capacity can be lost from both pending request Defenders (i.e., ACCEPTED or COUNTEROFFER status) and conditional Defender reservations.

- 1. Capacity lost from a pending Defender:
 - a. A pending Defender that is fully preempted has OASIS status SUPERSEDED. On the Preemption Summary and Preemption Detail screens, the 'Preemption Component State' is PREEMPTED.
 - b. A pending Defender that is partially preempted has OASIS status COUNTEROFFER and 'Preemption Component State' is PARTIAL.
- 2. Capacity is preempted in full or in part from a reservation with a RECALL.
 - a. The RECALL is a new reservation on OASIS. The profile of the RECALL represents the capacity that is taken from the Defender reservation.
 - b. The capacity left on the reservation will match the 'Requested Remaining Profile' from the submitted ROFR request.
 - c. The Related field of the RECALL is the Defender AREF. The 'Seller' comment shows the Challenger that benefited from the RECALL.



d. Clicking on the 'MW Grant' hyperlink from the Defender AREF shows the Reduction Details screen with the RECALL.

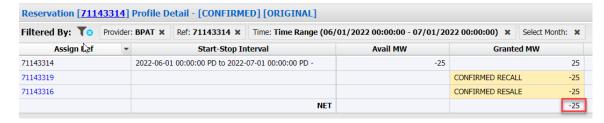


e. The 'ROFR Status' and 'Preemption Component State' fields are set to PREEMPTED on the ROFR Summary, Preemption Summary, and Preemption Detail screens.

O. Reconciling an Orphan Resale

An orphan Resale is one in which the capacity supporting the Resale has been preempted from its parent reservation. Here is how a Reseller can identify an orphan Resale.

- Open the Defender reservation that has been preempted from the Transactions > Reservation Summary screen. See section N for how to tell if a Defender has been preempted.
- 2. Click on the 'MW Grant' hyperlink to open Reservation Profile Detail.



- a. A RECALL reservation represents the preempted capacity.
- b. There exists one or more CONFIRMED Resales.
- c. The Net balance is negative, indicating that there is no longer sufficient capacity on the parent reservation to support the Resale following the RECALL.
- d. This NET balance needs to be reconciled by adjusting the Resale(s) until the NET is zero or positive.

The Reseller can reconcile the Resale on OASIS as follows:

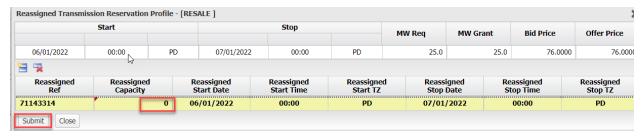
- 3. Open the Resale from the Transactions > Reservation Summary screen.
- 4. Click on the 'Seller Update' button at the top right of the screen to open screen Seller Transmission Reservation Update.

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 Under the Transmission Reservation Profile section, click the option 'Add/Edit Reassign' to open the screen Reassigned Transmission Reservation Profile.



6. Adjust the 'Reassigned Capacity' value according to how much capacity is remaining following Preemption and ROFR.



- a. Repeat the process for each reassignment row as appropriate.
- b. Additional rows may be added to reconcile affected capacity that has changed over time.
- c. Click the 'Submit' button to save changes to return back to the Seller Transmission Reservation Update screen.



7. Under the Transmission Reservation Profile section, modify the 'MW Grant' value to match the 'Reassigned Capacity' adjustments made for the reconciliation. Note: Do not modify the Price fields.

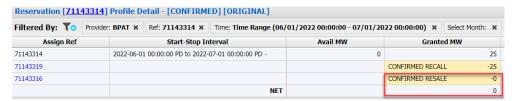


8. Click the green checkmark button

at the top right of the screen to complete the reconciliation for this Resale.



On the Transmission Reservation Detail screen for the Resale, verify that the 'MW Grant' field shows the correct reconciled value. 10. Return to the Reservation Profile Detail screen for the Resale parent Defender reservation (from step 1).



- a. The CONFIRMED Resale should now show the reconciled value.
- b. Repeat these steps as necessary for any other Resales from the preempted Defender until the NET balance is zero or positive.

This completes the reconciliation of orphan Resales <u>for the preempted</u>

<u>Defender reservation</u>. However, if the Resales reconciled from above have any subsequent Resales, those Resales may now need to be reconciled as well.

- 11. The Assignee of the initially reconciled orphan Resale is the Reseller of any subsequent Resales. They can reconcile their orphan Resales by following the same process as above.
- 12. When there is a daisy-chain of Resales of other Resales, the orphan Resale reconciliation process must be completed by the initial Reseller first, followed in sequence by subsequent Resellers.

Revision History

Version	Date	Change
1.0	01/18/22	Initial draft posted with sections A to D.
1.1	01/19/22	Updated section B to add the RECALL and RELINQUISH alarms.
1.2	02/14/22	Added draft sections E through O.
1.3	02/28/22	Removed draft designation. Made minor grammar and formatting changes throughout. This version is used for the PCM "go live".
1.4	03/15/23	Updated section A regarding how to subscribe to PCM email notifications. Made a correction to section C.2.b regarding waiving the right to challenger. Updated section L to note that Seller comments are updated at the conclusion of the Preemption process.