BPA Planning Coordinator Notifications

Frequently Asked Questions Revised: 7/11/14

Planning Coordinator Background

BPA has completed analysis on the NERC Planning Planning Coordinator (PC) function to determine how it applies to entities within the BPA Balancing Authority Area (BAA). In December 2013 BPA notified 71 registered Transmission Owners (TO), Load Serving Entity (LSE), and Distribution Provider (DP) customers that BPA would serve as their Planning Coordinator. In July 2014 BPA is sending out additional notifications or Letters of Agreement to registered GO customers (that are not in the TO/LSE/DP group that have already received notification) identifying specific generating facilities for which BPA will serve as Planning Coordinator.

BPA is the PC for all BPA customers registered with NERC regardless of whether or not the customer is in BPA's BAA. BPA is NOT the PC for BPA customers that are currently registered and performing PC functions. In collaboration with PacifiCorp, BPA developed a methodology to carry out the PC function and has been reaching out to other PC entities to encourage consistency in implementation.

Frequently Asked Questions:

- 1. What is the role of the Planning Coordinator and what NERC requirements are applicable to a PC? The Planning Coordinator is responsible for coordinating and integrating transmission facilities and service plans, resource plans and protection systems. There are currently 258 standard requirements in the FAC, MOD, PRC and TPL standard categories, 32 of which apply to Generator Owners. If you would like a complete list of what standard requirements BPA is considering in its PC role, please contact the BPA Customer Service Reliability Program Mailbox at csreliabilityprogram@bpa.gov.
- 2. Why is BPA announcing their Planning Coordinator Area? BPA has been researching and analyzing the PC function and requirements for a couple years. NERC Reliability Standard PRC-023-2 requires BPA to run a study on its Planning Coordinator Area. This standard prompted BPA's definition of the PC Area to remain in compliance. http://www.nerc.com/files/PRC-023-2.pdf
- 3. What were the criteria for an entity to be included in the PC Notification? Why were some customers included and others not? PC notifications were sent only to those BPA customers that are registered with NERC. Although all BPA customers' loads (including smaller, unregistered customers) are considered to be in BPA's Planning Coordinator area, we only have to report to NERC on registered entities. The PC notifications reflect this formal NERC registration.

- **4.** What will change now that BPA has formally announced its PA Role? BPA has been technically and informally acting in the role of the PC for all customers for many years--the PC announcement formalizes that role with registered customers. There is no anticipated change in relationship due to this announcement for registered or non-registered customers.
- 5. How will this formal recognition of BPA as the PC for all of BPA's NERC-registered customers help clarify functional responsibilities for NERC requirements? The applicability standard documentation provided in the PC notification letters clearly shows per standard and requirement which entity is on point for reporting to NERC (BPA, customer, or both). Understanding the customer and PA role separations will enhance reporting efficiency and compliance for BPA and its customers. Additionally BPA will work with each impacted customer on an annual basis to provide documentation that BPA is fulfilling the PA requirements. This process will likely look similar to the Annual System Review letter process.
- 6. My entity isn't registered as a Transmission Planner (TP) is this a problem? Will BPA be a customer's TP? Every qualifying transmission asset should have an associated Transmission Owner and Transmission Planner. In general, BPA will not be the TP for customer-owned assets. The owner retains TP responsibilities either by performing the TP function themselves or arranging to have it done for them. Announcing BPA's PC responsibility for a particular entity does not obligate BPA to perform any other NERC registration role nor to identify any gaps in NERC registration. BPA will be considering Coordinated Functional Agreements (CFR's) with Generator Owners in the fall of 2014 to delegate TP registration to BPA.
- **7.** What if my entity is registered but did not receive a PC notification? Please notify the BPA Customer Service Reliability Program Mailbox <u>csreliabilityprogram@bpa.gov</u>.
- **8.** What was the general rule for boundaries between Planning Coordinators? In general, PC boundaries follow ownership boundaries. Letters of Coordination are being done between BPA and Adjacent Planning Coordinators in cases where it is unclear which entity would best serve as PC for the generating facility.
- **9.** What is the difference between Planning Authority and Planning Coordinator? While both terms refer to the same role and function, "Planning Coordinator" is the official terminology being implemented across the industry, and which BPA will be using henceforth.
- **10.** Has BPA coordinated with any adjacent Planning Coordinators? BPA collaborated with PacifiCorp to jointly create the BPA PC Methodology. In September 2013 BPA and PacifiCorp jointly notified ALL Planning Coordinators within the WECC Region of our Implementation Methodology and encouraged questions.
- **11. Other questions**? If you have any questions not addressed in these FAQ's, please notify the BPA Customer Service Reliability Program Mailbox <u>csreliabilityprogram@bpa.gov</u>.