BPA Planning Authority (PA) Notifications

Frequently Asked Questions Revised: 1/15/14

Planning Authority Background

BPA has completed analysis on the NERC Planning Authority/Planning Coordinator (PA) function to determine how it applies to entities within the BPA Balancing Authority Area (BAA).

Notifications were sent to customers for whom BPA will serve as the NERC registered PA effective January 1, 2014. Notifications will also be sent to any of these customers that have qualified assets applicable to relay loadability under NERC reliability standard PRC-023-2 R6. The notifications for PRC-023-2 R6 qualified assets are being sent out separately from the PA notifications as the relay loadability study they are based on is currently being finalized.

BPA is the PA for all BPA customers registered with NERC regardless of whether or not the customer is in BPA's BAA. BPA is NOT the PA for BPA customers that are currently registered and performing PA functions. For BPA customers that receive transmission (transfer) service from a third party provider, BPA has contacted these providers requesting that all future PA function communication be directed through BPA. In collaboration with PacifiCorp, BPA developed a methodology to carry out the PA function and has been reaching out to other PA entities to encourage consistency in implementation.

Frequently Asked Questions:

- 1. What is the role of the Planning Authority and what NERC requirements are applicable to a PA? The Planning Authority is responsible for coordinating and integrating transmission facilities and service plans, resource plans and protection systems. There are 194 standard requirements in the FAC, MOD, PRC and TPL standard categories. Impacted entities have received a customized analysis indicating roles for all these requirements. If you would like a complete list of what standard requirements BPA is considering in its PA role, please contact the BPA Customer Service Reliability Program Mailbox at csreliabilityprogram@bpa.gov.
- 2. Why is BPA announcing their Planning Authority? BPA has been researching and analyzing the PA function and requirements for a couple years. NERC Reliability Standard PRC-023-2 requires BPA to run a study on its planning authority area. This standard prompted BPA's definition of the PA 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 PA Notification? Why were some customers included and others not? PA 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 Authority area, we only have to report to NERC on registered entities. The PA 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 PA for all customers for many years—the PA

- 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 PA for all of BPA's NERC-registered customers help clarify functional responsibilities for NERC requirements? The applicability standard documentation provided in the PA notification letters clearly shows by each standard and requirement who 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 PA responsibility for a particular entity does not obligate BPA to perform any other NERC registration role nor to identify any gaps in NERC registration.
- 7. What if my entity is registered as a Load Serving Entity (LSE) or Distribution Provider (DP) but we did not receive a PA Notification? Please notify the BPA Customer Service Reliability Program Mailbox csreliabilityprogram@bpa.gov.
- **8.** What was the general rule for boundaries between Planning Authorities? In general, PA boundaries follow ownership boundaries. For example, BPA's PA responsibility for a transfer customer will be at the change of ownership between the transfer customer and the transfer provider.
- **9.** What is the difference between Planning Authority and Planning Coordinator? Nothing they can be used interchangeably.
- 10. Has BPA coordinated with any adjacent Planning Authorities? BPA collaborated with PacifiCorp to jointly create the BPA PA Methodology. In September 2013 BPA and PacifiCorp jointly notified ALL Planning Authorities within the WECC Region of our Implementation Methodology and encouraged questions. Any PA to PA questions can be sent to csreliabilityprogram@bpa.gov.
- **11. Other questions**? If you have any questions not addressed in these FAQ's or would like a copy of the BPA PA Methodology, please notify the BPA Customer Service Reliability Program Mailbox csreliabilityprogram@bpa.gov.