



NT Redispatch and Attachment M

1. What is the *pro forma*?

- FERC *pro forma* is to implement NT Redispatch from all Network Resources on a least-cost, non-discriminatory basis.
- Section 30.5 states: “As a condition to receiving Network Integration Transmission Service, the Network Customer agrees to redispatch its Network Resources as requested by the Transmission Provider pursuant to Section 33.2. To the extent practical, the redispatch of resources pursuant to this section shall be on a least cost, non-discriminatory basis between all Network Customers, and the Transmission Provider.”
- Under a *pro forma* tariff, if the Transmission Provider identifies a constraint on its transmission system, it must reduce all firm transactions on the constrained facility pro rata.
- However, Section 33.2 states: “To the extent the Transmission Provider determines that the reliability of the Transmission System can be maintained by redispatching resources, the Transmission Provider will initiate procedures pursuant to the Network Operating Agreement to redispatch all Network Resources and the Transmission Provider’s own resources on a least-cost basis without regard to the ownership of such resources.”
- There is no Attachment M in the *pro forma* tariff.

2. What did we hear?

- There have been a number of discussions over the past several years between BPA and NT customers on the topic of NT Redispatch.
- BPA and NT customers recognize the complexity of non-federal NT Redispatch and the need to put in place detailed protocols for how BPA would implement non-federal NT Redispatch should it do so.

What is BPA's Current Tariff Language?

BPA's Tariff differs from the NT redispatch provisions of the *pro forma* tariff in that it provides it with the ability to request redispatch solely from the Federal Columbia River Power System (FCRPS) rather than all Network Resources.

What is BPA's Current Tariff Language? (Continued)

- Under Sections 30.5 and 33.2, NT Customers must make their Network Resources available for redispatch. The non-*pro forma* phrase, “Except as provided in Attachment M” provides Bonneville the option to rely upon the NT redispatch procedures set out in Attachment M.
- Attachment M provides Transmission with the ability to request Discretionary, NT, and Emergency redispatch of the Federal Columbia River Power System (FCRPS), to relieve transmission constraints or maintain the reliability of the Transmission System.

What is BPA's Current Tariff Language?

(Continued)

Attachment M provides for three types of redispatch:

- Discretionary Redispatch – BPA-TS may request redispatch from BPA-PS prior to the curtailment of any firm or non-firm transmission schedules (PTP or NT) in order to avoid or ameliorate curtailments. There is no obligation to request or provide Discretionary Redispatch.
- NT Firm Redispatch – BPA-TS requests of BPA-PS redispatch from the FCRPS for the purpose of maintaining firm NT schedules after BPA-TS has curtailed non-firm transmission schedules (NT and PTP) in NERC curtailment priority order consistent with NERC curtailment priorities. BPA-TS curtails firm PTP schedules and requests NT Redispatch from the FCRPS proportionate to the non-de minimis amounts of firm PTP and NT flows impacting the congested path. BPA-PS will provide NT Redispatch from FCRPS to the extent available and to the extent that the provision of NT Redispatch does not violate non-power constraints.
- Emergency Redispatch – BPA-TS requests redispatch from BPA-PS upon declaration of a system emergency as defined by NERC. Emergency Redispatch must be provided even if by so providing BPA-PS will violate non-power constraints.

Tariff Alternatives Considered

Alternative 1 – Status Quo:

- NT Redispatch: BPA would have the ability to provide NT Redispatch solely from the FCRPS or from all Network Resources
- Attachment M: Retain in the tariff

Alternative 2 – *Pure Pro Forma*:

- NT Redispatch: Provide NT Redispatch from all Network Resources
- Attachment M: Remove from tariff and do not provide Discretionary and Emergency Redispatch

Alternative 3 – Partial *Pro Forma*:

- NT Redispatch: *Pro Forma* (provide NT Redispatch from all Network Resources)
- Attachment M: Retain Discretionary and Emergency redispatch through *non-pro forma* language in the tariff

Alternative 4 – Partial *Pro Forma*:

- NT Redispatch: BPA would have the ability to provide NT Redispatch solely from the FCRPS or from all Network Resources
- Attachment M: Remove from tariff and provide Discretionary and Emergency Redispatch through the Redispatch and Curtailment Business Practice

3. What are we proposing?

BPA proposes to revise the Tariff to be consistent with Alternative 4:

- BPA proposes to maintain its ability to provide NT Redispatch solely from the FCRPS or from all Network Resources by replacing the “except as provided in Attachment M” language with language that accomplishes this objective.
- BPA proposes to remove Attachment M from the tariff, but retain the provision of Discretionary and Emergency Redispatch from the federal system through the Redispatch and Curtailment Business Practice.

4. If not proposing *pro forma*, then which TC-20 tariff principles apply?

- Maintaining BPA's ability to provide NT Redispatch solely from the FCRPS or from all Network Resources is a deviation from *pro forma* that, at this time, provides significant benefit to BPA's mission and the region.
- The removal of Attachment M is consistent with *pro forma*.

5. Why are we proposing this position?

- BPA believes that maintaining BPA's ability to provide NT Redispatch solely from the FCRPS or from all Network Resources provides significant benefit to BPA's mission and the region because:
 - There are currently few non-federal designated network resources that would provide significant NT Redispatch capability.
 - The amount of non-federal designated network resources capacity that could actually provide additional reliable capacity in the direction needed based on location is minimal at this time.
 - It is a benefit to the region to maintain the option to rely on the FCRPS alone for NT Redispatch because those resources can be directly dispatched by BPA without relying on a few outside resources to make up what would likely be a very small part of the relief required.
 - The benefit to the region of redispatching non-federal resources *at this time* does not justify the cost to BPA or customers for required systems changes.
- The removal of Attachment M is consistent with *pro forma*. The benefits to customers of Attachment M can be maintained by revisions to the Redispatch and Curtailment Business Practice.

6. What are the change impacts?

- The Redispatch and Curtailment Business Practice already reflects much of the content in the current Attachment M.
- Bonneville would make some revisions to the Business Practice to incorporate the content of Attachment M that is not already included.

7. Is there a rate case impact?

- There is no rate case impact.

Proposed Tariff Language

Section 30.5: As a condition to receiving Network Integration Transmission Service, the Network Customer agrees to redispatch its Network Resources as requested by the Transmission Provider pursuant to Section 33.2. To the extent practical and at its discretion, the Transmission Provider may redispatch available Federal Columbia River Power System resources or Network Resources on a least cost, non-discriminatory basis between all Network Customers, and the Transmission Provider.

Proposed Tariff Language (Continued)

Section 33.2: During any period when the Transmission Provider determines that a transmission constraint exists on the Transmission System, and such constraint may impair the reliability of the Transmission Provider's system, the Transmission Provider will take whatever actions, consistent with Good Utility Practice, that are reasonably necessary to maintain the reliability of the Transmission Provider's system. To the extent the Transmission Provider determines that the reliability of the Transmission System can be maintained by redispatching resources, the Transmission Provider may redispatch available Federal Columbia River Power System resources or it may initiate procedures pursuant to the Network Operating Agreement to redispatch all Network Resources and the Transmission Provider's own resources on a least-cost basis without regard to the ownership of such resources. Any redispatch of Network Resources under this section may not unduly discriminate between the Transmission Provider's use of the Transmission System on behalf of its Native Load Customers and any Network Customer's use of the Transmission System to serve its designated Network Load.

Proposed Tariff Language (Continued)

Section 33.3: Whenever the Transmission Provider implements redispatch of available Federal Columbia River Power System resources or least-cost redispatch procedures of Network Resources in response to a transmission constraint, the Transmission Provider and Network Customers will each bear a proportionate share of the total redispatch cost based on their respective Network Load.

NT Redispatch and Attachment M Tariff Proposal Summary

<p>1. What is the <i>pro forma</i>?</p>	<p>FERC <i>pro forma</i> is to implement NT Redispatch from all Network Resources on a least-cost, non-discriminatory basis. Discretionary and Emergency Redispatch are non-<i>pro forma</i>.</p>
<p>2. What did we hear?</p>	<p>BPA and NT customers recognize the complexity of non-federal NT Redispatch and the need to put in place detailed protocols for how BPA would implement non-federal NT Redispatch should it do so.</p>
<p>3. What are we proposing?</p>	<p>BPA proposes to maintain the ability to provide NT Redispatch solely from the FCRPS or from all Network Resources. BPA also proposes to remove Attachment M from the tariff but retain the provision of Discretionary and Emergency Redispatch from the federal system through the Redispatch and Curtailment Business Practice.</p>
<p>4. If not proposing <i>pro forma</i>, then which TC-20 tariff principles apply?</p>	<p>Maintaining BPA's discretion to not require redispatch of non-federal DNRs is a deviation from <i>pro forma</i> that provides significant benefit to BPA's mission and the region. The removal of Attachment M is consistent with <i>pro forma</i>.</p>
<p>5. Why are we proposing this position?</p>	<p>BPA believes that maintaining BPA's ability to provide NT Redispatch solely from the FCRPS or from all Network Resources provides significant benefit to BPA's mission and the region because implementation of non-federal NT Redispatch <i>at this time</i> would provide little benefit in terms of effective congestion relief. It is a benefit to the region to maintain the option to rely on the FCRPS alone for NT Redispatch because those resources can be directly dispatched by BPA without relying on a few outside resources to make up what would likely be a very small part of the relief required. The removal of Attachment M is consistent with <i>pro forma</i>. The benefits to customers of Attachment M can be maintained by revisions to the Redispatch and Curtailment Business Practice.</p>
<p>6. What are the change impacts?</p>	<p>The Redispatch and Curtailment Business Practice will need to be revised to incorporate the content of Attachment M that is not already included in the BP.</p>
<p>7. Is there a rate case impact?</p>	<p>There is no rate case impact.</p>