De Minimis Update

January 28, 2020
De Minimis Customer Update

• BPA has reviewed customer comments received to date.

• In response to customer feedback, BPA is developing an internal agency decision framework (ADF) to identify *de minimis* alternatives for further consideration.

• In the spirit of transparency, we are sharing a draft list of the policy alternatives identified at a high-level.

• We plan to continue to engage customers as we develop and later evaluate the alternatives.
Draft ADF Alternatives

• **Alternative 1.** Status Quo. Apply *de minimis* test 1 to both ST and LT redirects. Apply *de minimis* test 2, only to LT redirects.

• **Alternative 2.** Align ST *de minimis* with LT *de minimis* test (i.e., test 1 and test 2 are both applied to ST).

• **Alternative 3.** Same as Alternative 2, establish a different threshold for ST redirects.

• **Alternative 4.** For the ST redirect, apply a *de minimis* test based on the net PTDF impact. The net impact is the redirect PTDF minus the parent PTDF. Establish a new threshold for acceptable net impacts. No change to LT redirects.

• **Alternative 5.** Establish a cumulative limit for *de minimis* impacts. This alternative would not apply to status quo but it is complementary to all other alternatives.
Next Steps

• February 6 customer WebEx
  – Technical description of draft alternatives

• March 17 customer meeting
  – Share Objective and Principles
  – Share updated list of Alternatives – current list is not exhaustive and is subject to change