

MRDAP OATT and Business Practice Draft Proposals for Discussion

Updated January 17, 2019

Proposal #1

Subject: Redirecting TSRs

Background: Currently, TSRs in the queue cannot be redirected.

Proposal: A TSR can be redirected with no change in queue position if the redirected TSR does not require additional capacity across any constrained flow gate. If the redirected TSR would require additional capacity across a constrained flow gate, the TSR can be reduced so that additional capacity is not needed across the constrained flow gate.

Example 1: Customer has a 100 MW TSR from Garrison to Seattle area. Customer wants to redirect the TSR from Garrison to Mid-C. Redirect does not increase capacity needed across any constrained flow gate. Redirect is allowed.

Example 2: Customer has a 100 MW TSR from Garrison to Seattle area. Customer wants to redirect the TSR from Garrison to Mid-C. Redirect increases capacity needed across a constrained flow gate from 40 to 50 MW. Customer reduces TSR to 80 MW. Redirect is allowed.

Discussion/Status: Participants agreed that redirect language in the pro forma OATT applies only to confirmed reservations. BPA suggested that customers who may want to pursue redirecting TSRs on BPA introduce this topic in the BPA tariff reform and/or business practices forums. That process ended December 2018. No further discussion is planned as part of MRDAP process.

Proposal #2

Subject: TSRs requiring studies to provide full request

Background: Currently, a transmission customer must take available ATC to remain in the queue while studies are done on the balance of the TSR.

Example: Customer requests 300 MW on a path with 100 MW of ATC. Customer must take 100 MW of ATC to initiate a study for the remaining 200 MW.

Proposal: Customer can remain in the queue during the study period without taking available ATC, unless another customer submits a pre-confirmed TSR that requires the same ATC. In that case, the first customer will have X days to commit to the ATC or be dropped from the queue.

Discussion/Status: Transmission Customers argued that the background statement (above) is based on a misinterpretation of FERC precedent and that a TSR requiring a combination of existing ATC and capacity from upgrades can remain in the queue until all studies are complete and full or partial service can be offered. The parties were not able to reach consensus on this proposal. No further discussion is planned as part of MRDAP process.

Proposal #3

Subject: Coordination of TSRs on multiple transmission systems

Background: A transmission customer may need service across multiple transmission systems to reach an attractive market. It may be untenable for the customer to commit to one offer of transmission service before an offer is available from an adjacent transmission system.

Under NAESB's Service Across Multiple Transmission Systems (SAMTS), a customer can "link" TSRs on adjacent systems. Some parties believe that under SAMTS a customer cannot be forced to act on an offer from one transmission provider until offers have been made by all transmission providers subject to the linked TSRs. Other parties do not believe SAMTS requires a transmission provider to wait for a response to an offer if the other transmission providers are not ready to make offers.

Proposal: Customer can wait to respond to an offer for a linked TSR unless another customer submits a pre-confirmed TSR that requires the same ATC. In that case, the first customer will have X days to commit to the ATC or be dropped from the queue.

Discussion/Status: The parties were not able to reach consensus on this proposal. All utilities involved offer some variety of SAMTS. The disagreement arose around whether SAMTS applied where there was insufficient ATC available on one or more coordinating systems. No further discussion is planned as part of MRDAP process.