

FERC Order 676-I

CBPI Conference Call
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Overview

- **Background:**
 - On 02/04/20, FERC adopted v003.2 of the NAESB standards.
 - This includes adoption of the v003.1 standards that had not been previously adopted.
 - BPA is a non-jurisdictional entity. But Objective 4d of BPA's Agency Strategy calls for better aligning BPA's OATT with *pro forma* and industry best practices.
- **Objective:**
 - Compliance with the FERC-approved NAESB standards.
 - Finish meeting the terms of the TC-20 Settlement.
- **FERC Compliance Deadline:**
 - Jurisdictional entities have until July 27, 2021 to make compliance filings.
 - Deadline is October 27, 2021 for jurisdictional entities.

BPAT Implementation

- Vendor OATI is working towards the FERC 676-I implementation deadline of 10/27/21.
 - BPA is working within this same timeline in concert with the industry.
- Some OATI software has been delivered.
 - The remaining to be delivered by November 2020.
 - Bug fixes will continue through 2021.
- BPAT implementation October 2020 to October 2021.
 - Detailed schedule is still fluid at this time.
 - Most of the customer impacts will be communicated via these CBPI calls and through the Business Practice update process.
 - Longest lead-time is for extensive testing for entirely new software for Short-term Preemption and Competition (STPC).

Change Highlights

Resales

Current:

- Resales 'Off OASIS' are entered into OASIS in an already-confirmed status.
- Does not require action by both parties to the Resale (reseller and assignee).

New Standard:

- Both parties to the Resale must document their agreement on OASIS.
- Reseller must post the Resale to OASIS in the status ACCEPTED.
- The Assignee is now required to set the Resale to CONFIRMED, indicating their agreement.

Consolidation

Current:

- There is no official way for customers to merge their “like” reservations into a single reservation for easier management of their transmission portfolio.
- Instead, customers perform a Resale to themselves to accomplish this.

New Standard:

- A new request type of CONSOLIDATION will be created to accomplish the same thing as Resale-to-self: aggregate multiple reservations with the same POR/POD (and/or Source/Sink) into a single TSR.
- The CONSOLIDATION functionality will work much like a Resale-to-self.
- All reservations being consolidated must already be unconditional (i.e., no longer subject to short-term preemption or competition).
- Resales-to-self will no longer be permitted.

Treatment of Redirects per *Dynegy*

Current:

- A customer loses rights to their firm parent when a redirect is CONFIRMED on OASIS. If that redirect is then lost due to preemption/competition, then that customer has lost rights on both the parent and the child.

New Standard:

- FERC ruled against this practice in a case called *Dynegy*.
- A customer will not lose rights to their parent until a firm redirect is both confirmed and unconditional (no longer subject to preemption/competition).
- If the customer loses a firm redirect to preemption or competition, their rights are automatically restored back to their firm parent.
- This policy only applies to firm redirects from parents that are unconditional at the time the redirect is confirmed on OASIS.
- Firm redirects from conditional parents and non-firm redirects do not get protection under *Dynegy*. This will work the same way it does today.
- NAESB has drafted some new standards to address gaps created by FERC's ruling.

Preemption and Competition

Current:

- The current standards for P&C are limited and somewhat ambiguous.

New Standard:

- The basic principles remain unchanged: challengers, defenders, right of first refusal (ROFR) rules, etc.
- The new standards are far more comprehensive.
- The changes are almost all customer-centric. There are changes beneficial to both PTP and NITS customers.
- There are changes for improved: transparency (what is going on), fairness (why are things happening), and efficiency (ease of customer use).
- The changes are far more costly and complex for the Transmission Provider to administer the Preemption and Competition process.
- There will be huge software changes and significant changes to our Business Practices.

Unmasking of Source / Sink on a TSR

Current:

- Per FERC guidance, the Source and Sink on a request may be “masked” (hidden) on OASIS while the request is being studied. This is done for market confidentiality. When “masked”, the Source and Sink is visible on OASIS only to the TP and the customer submitting the request.
- Today, the Source and Sink are “unmasked” (made visible to all parties) on OASIS once a request goes to final CONFIRMED status. These fields remain masked in other final states.

New Standard:

- The Source and Sink will be “unmasked” once the TSR reaches any final state: CONFIRMED, WITHDRAWN, REFUSED, etc.
- The Source and Sink will continue to be “masked” on OASIS while the TSR is in any pending status: QUEUED, RECEIVED, STUDY, ACCEPTED, etc.

Extend Conditional Firm Biennial Reassessment

Current:

- FERC allows the conditions for certain Conditional Firm Service (CFS) to be reassessed by the TP every 2 years.
- FERC also allows this reassessment period to be waived or extended such that TPs may offer CFS longer than 2 years without reassessment. (Order 890 P985).
- The prior NAESB standards only mentioned that the TP may waive the reassessment. No mention was made of the ability to extend.

New Standard:

- NAESB standards now make clear that the TP has the right to both waive or extend the biennial reassessment.
- Software changes to allow modification of reassessment stop time.
- Current Business Practice already says that BPA “maintains an ongoing right to perform a Reassessment” if we do not reassess at the 2 year point.

Preempted Reservations in SAMTS

Current:

- Service Across Multiple Transmission Systems (SAMTS) allows a customer to define a group of contiguous and dependent requests and reservations across different TP's (i.e., a Coordinated Group or CG).
- If a request is not granted in full by one TP, the customer is permitted to withdraw or reduce their requests on the coordinated TP systems.
- The current standards have no provision if a reservation included in a CG is preempted.

New Standard:

- If a reservation in a CG is preempted in full or in part, the customer will have the right to reduce or withdraw their other requests in the CG.
- The principle and the OASIS mechanics will work the same way: Customer will be able to opt out of any request in the CG if another request in the CG is not granted in full or if a reservation in the CG is preempted.

Posting of AFC / TFC on OASIS

Current:

- Per FERC guidance, posting of ATC and TTC information is required on OASIS. Posting of flowgate information (AFC and TFC) is optional.
- The OASIS templates only provide data elements to post ATC and TTC information.
- BPA currently posts both AFC/TFC and ATC/TTC data into the same ATC/TTC data elements on OASIS.

New Standard:

- Adds data elements for the posting of AFC/TFC separate from ATC/TTC.
- Change would involve posting new AFC/TFC data to the new data elements and then migrating past AFC/TFC data over to the new data elements.
- Both internal and external customers would have to change their queries to distinguish between AFC/TFC and ATC/TTC.
- We can delay a decision on this item as the current practice is allowable.

Terminating Secondary Network

Current:

- Under NITS standards, a customer may request Secondary Network service. They can also request the termination of Secondary Network service already granted.
- The TP may deny the termination request. The NAESB standards were unclear about when a TP may deny a termination request. FERC asked NAESB to clarify the standards.

New Standard:

- The NAESB standards have been updated to clarify that the TP may only deny a request for termination if the customer had asked for more MW to be terminated than Secondary Network rights held by the customer.
- OATI NITS software has already been updated accordingly.
- This change does not apply to BPAT at this time because our Business Practices do not currently have a provision for requesting termination of Secondary Network service.

ATC Modeling Standards

Current:

- The calculation of ATC is regulated by NERC MOD standards.
- The industry is in the process of considering a move of these standards from NERC to NAESB.

New Standard:

- NAESB has drafted book WEQ-023 intended to replace the NERC MODs.
- FERC has not yet adopted any of the proposed changes.
 - A NOPR closed in April on the proposed retirement of the NERC MODs.
 - Order 676-I does not adopt any migration of modeling standards from NERC to NAESB.
 - The adoption of NAESB standards in WEQ-023 is now the subject of a separate FERC NOPR. Comments are due to FERC by Nov 3.
 - FERC will likely rule on the NERC MOD retirements and the NAESB WEQ-023 standards in a single ruling.

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OASIS changes to be implemented.

Topic	Sub	Description and Status
<i>Dynergy</i>	OS	Standards for treatment of Parent reservation when Redirect is lost to Short-term Preemption and Competition.
DUNS	OS	Make the use of DUNS numbers optional. DUNS will still be required by BPAT.
Source/Sink	OS	Source/Sink will be unmasked once a TSR is in any final state.
AFC/TFC	OS	Updates templates for posting of AFC and TFC information (like ATC/TTC).
Resales	OS	Resales will now be submitted as ACCEPTED rather than CONFIRMED.
CF	OS	TP's may extend the period for Biennial Reassessment of Conditional Firm.
1d Narrative	OS	Clarifies that TP's will have 1 business day to post a narrative for zero ATC.
Secondary Network	OS	Clarifies that a TP may invalidate a request to terminate Secondary Network service that exceeds the capacity available.
SAMTS	OS	Clarifies how reservations included in a Coordinated Request are handled if displaced.
Consolidation	OS	New OASIS request type that will be used to merge multiple "like" reservations into a single reservation for easier tagging. Replaces "Resale-to-self".
Preemption/ Competition	OS	Five year effort to develop comprehensive standards for Short-term Preemption and Competition.

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EIR/eTag related changes done.

Topic	Sub	Description and Status
EIR	JESS	Establish NAESB standards for the Electric Industry Registry (EIR) to replace the NERC Transmission System Information Network (TSIN). (2013 API 3.d)
NERC	JESS	Modify the WEQ-004 Coordinate Interchange standards for tagging and related definitions in coordination with NERC (2014 API 3.a.ii).
15-min Scheduling	JESS	Tagging changes to support 15-minute Scheduling from FERC Order 764 (2013 API 3.a.iii).
	JESS	Define default intervals for 15-minute Scheduling (2013 R12010).
Market Operator	CISS	Changes needed to WEQ-002 (S&CP), WEQ-004 (Coordinate Interchange), and Electric Industry Registration (EIR) to support the Market Operator role. This was already implemented in Nov 2017 with eTag version 1.8.3.
Dynamic & Pseudo-tie Tagging	CISS	Modify WEQ-004 following proposed retirement of NERC INT-004-3.1 (API 1.d.i). NAESB standards to require RFI for Dynamic and Pseudo-ties mimic the previous NERC standards.
	CISS	Modify WEQ-004 to require tagging of intra-BA transactions (replace INT-011-1).

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Security-related changes done.

Topic	Sub	Description and Status
Security – General	PKI	Adopt changes to the Public Key Infrastructure (PKI) and Authorized Certification Authority (ACA) standards (2012 API 4.c.i and 4.c.ii).
Security – Tagging	PKI JESS	PKI security changes for tagging (2012 API 4.b).
Security – OASIS	PKI OS	OASIS communication security changes (2012 API 4.a).

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Implementation
not needed.

Topic	Sub	Description and Status
EIR	CISS	Remove all NERC references from WEQ-022 (which govern the EIR).
Definitions	SRS	Add common definitions from the Retail Electric Quadrant (REQ) into the WEQ-000 booklet used by the Wholesale Electric Quadrant (WEQ).
Consistency Changes	OS	“Consistency” changes to remove NERC references from OASIS standards (WEQ-001, 002, 003, 013) to ensure language alignment between NERC/NAESB.
Consistency Changes	DSM-EE	“Consistency” changes to remove NERC references from Smart Grid standards (WEQ-015, 018, 020) to ensure language alignment between NERC/NAESB.
Smart Grid	DSM EE	Modify the optional WEQ-019 smart grid standards to update the Energy Usage Information Model to align with other industry smart grid standards (2012 API 6.a).
ATC Standards	BPS	NAESB standards to complement NERC ATC MOD A. FERC declined to adopt these NAESB standards pending separate docket on NERC ATC MOD standards.
Manual Time Error Correction	BPS	Retire WEQ-006 (Manual Time Error Correction) due to NERC retirement of BAL-004. FERC declined to adopt this proposed retirement of the NAESB standards for Time Error Correction. WEQ-006 remains in effect.