

TC-20 Settlement Customer Workshop

June 13, 2019

Customer Workshop Agenda - June 13, 2019

TIME	TOPIC	PRESENTERS
9:30 - 9:40 AM	Agenda Review & Safety	Katie Sheckells
9:40 - 10:15 AM	Transmission Business Practice Process	Sarah Arison
10:15 - 10:45 AM	Losses	Chris Gilbert
10:45 - 11:00 AM	Queue Management	Danielle Johnson
11:00 - 11:15 AM	Break	
11:15 - 11:25 AM	Network Services - Seller's Choice & NT Dialogue	Katie Sheckells
11:25 - 11:35 AM	Network Services - NOA & Attachment G	Katie Sheckells
11:35 - 11:45 AM	Product Conversions	Katie Sheckells
11:45 - 12:45 PM	Lunch Break	
12:45 - 2:00 PM	Hourly Firm – Draft Monitoring & Evaluation Plan	Kevin Johnson & Katie Sheckells
2:00 - 2:15 PM	Break	
2:15 - 3:15 PM	Proposed ATC Changes	Kevin Johnson & Abbey Nulph
3:15 - 3:30 PM	Wrap up and Next Steps	Katie Sheckells

Transmission Business Practice

What has happened since the last update?

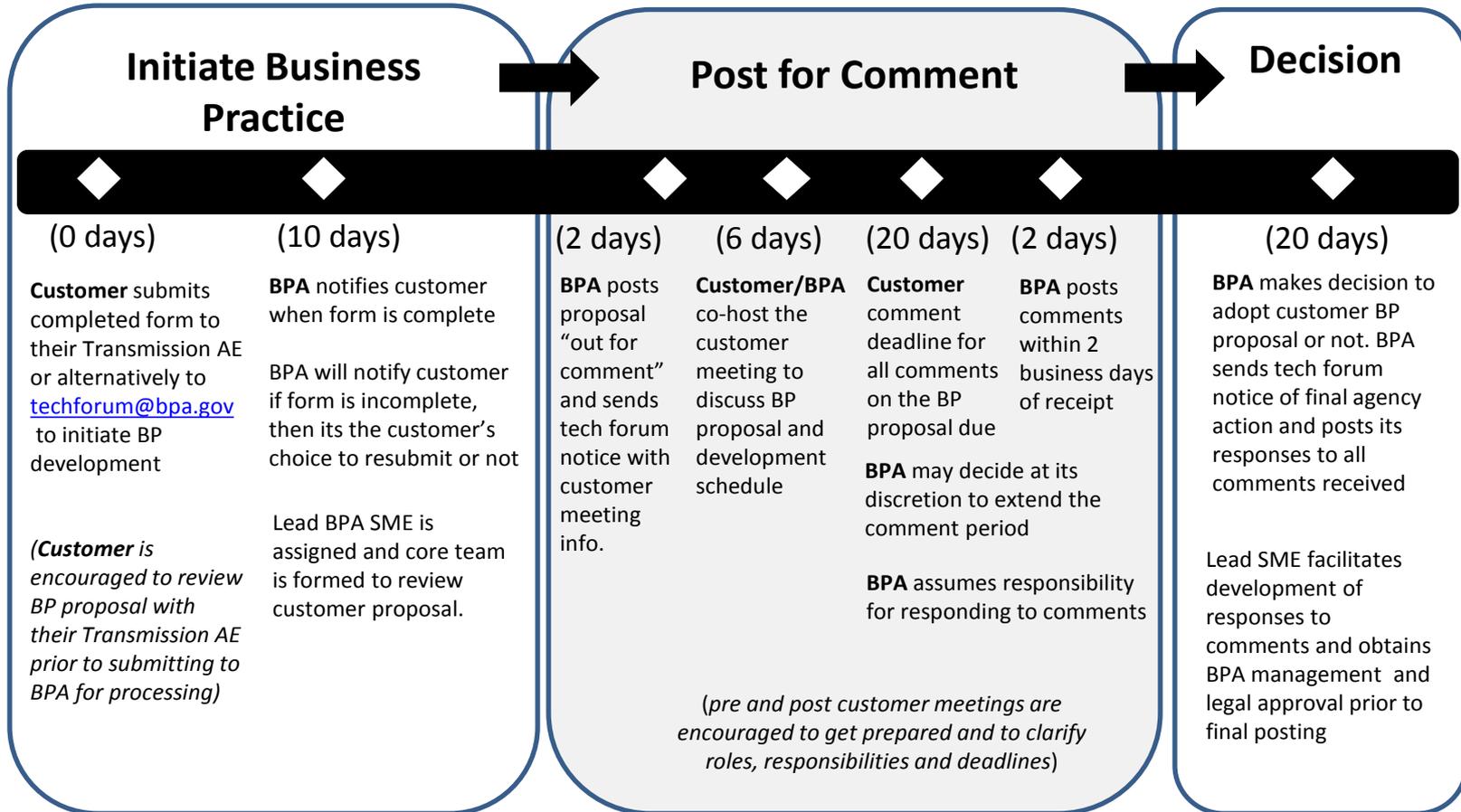
- BPA fielded a few questions on the new dedicated business practice phone line at 833-272-8972
- BPA plans to continue discussion today on the process for customer-initiated business proposals
- BPA will review how we plan to prepare responses to comments
- BPA will discuss what to expect should a submitter decide to withdraw their proposed business practice
- BPA made a few updates to the monthly release schedule of proposed business practices that will be shared with customers today

BPA responds to customer calls

- **Question (Q1):** How do you populate fields in Proposed Transmission Business Practice Request form?
- **Response (R1):** Download the form to your own system to access the field function. You can access the BP initiation form (#19) from on our website at: <https://www.bpa.gov/transmission/Doing%20Business/bp/Pages/bp-forms.aspx>.
- **Question (Q2):** What is the BPA response-to-comments due date for the Conditional Firm Business Practice?
- **Response (R2):** BPA provided the caller with the information requested at the time. Additionally, BPA modified the tech forum template to now include the “BPA Comment Response Due [Date], or as updated by a tech forum notice” to be responsive to future requests for information.

Continued discussion on the process

(Please note for all process steps below that Days means Business Days)



Please note that "Category B" proposals require a conference call be established within 6 business days after the tech forum notice is sent.

Preparing responses to comments

After the comment period closes:

- BPA will develop responses to comments (covers customer-initiated and BPA-initiated business practice proposals) within 20 business days following expiration of the applicable comment deadline (deadlines apply to all categories)
- BPA will post all responses to comments and our decision on whether to adopt the business practice proposal to our external website. BPA's decision is a final agency action. A tech forum notice will be sent out with this information
- If BPA receives a high volume of comments, comments are complex, or in limited situations BPA may need to reach out to the initiating customer to clarify the response to a comment, BPA may need to extend the comment response period beyond 20 business days
- If BPA needs to extend the comment period beyond 20 business days, a tech forum notice will promptly be sent out to notify all of BPA's revised comment response and decision deadline

Withdrawing your proposal

After a customer has submitted their completed form and proposed business practice language to BPA, the customer may withdraw it at any time by providing written notice and explanation to BPA.

If BPA receives a withdrawal notice from a customer for a completed form, here is what to expect:

- BPA will send a tech forum notice out within 5 business days of withdrawal receipt announcing the withdrawal and opening a 5 business day adoption period during which any customer may adopt the proposal for further consideration. BPA will also flag the proposal posted on the BPA website as withdrawn and open for adoption
- After the 5 day adoption period, BPA will announce either the adoption of the proposal or the final withdrawal and update the BPA website accordingly

Are there any new change impacts?

- BPA created an informal business practice call log to track calls made and responses provided to callers
- BPA updated the tech forum template notice to include BPA's expected response to comments date
- BPA updated the BP Initiation Form (#19) posted on our website at: <https://www.bpa.gov/transmission/Doing%20Business/bp/Pages/bp-forms.aspx>.
- If you are planning to submit a business practice proposal, BPA encourages early AE involvement before you submit your proposed business practice language

What is the current schedule?

- Continue to release proposed business practices in batches to help manage workload priorities (see next slide)
- One more customer update on business practices is planned for September 19. However, if questions arise beforehand we have the opportunity to return on August 6
- The end-goal is to “go live” with the new business practice development process by October 1

Proposed Business Practice Release Plan

Several factors influence the posting date for updated or new business practices therefore the release schedule is subject to changes:

June	July	Aug
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- TSR Study and Expansion Process (B)
- **Redispatch and Curtailment Procedures (B)**

- **Large Generator Interconnection (B)**
- Material Modifications (B)
- Surplus Interconnection (B)

- **Committed Scheduling (A)**
- **Uncommitted Scheduling (A)**

Heads Up: timing to be determined

- Unauthorized Increase Charge (B)
- Generation Imbalance Service (B)
- **Balancing Reserve Capacity - Effective 10/1 per TC-20**

Out for Comment

- **Network Integration (B)** (comment close 6/7) BPA response 7/8)
- ATC Methodology (B) (comment close 6/25 BPA response 7/24)

Effective 10/1 per BP-20:

Retired BP

- Customer Supplied Generation Imbalance Pilot Program

Modified BP – Reflecting Pilot Retirement

- Self-Supply of Balancing Services
- Balancing Services Resources Prequalification
- Oversupply Management Protocol
- Netting Resources for Operating Controls for Balancing Reserves

On Hold: not TC-20 related

- Redirects (A)
- Scheduling Transmission Service (B)
- Line and Load Interconnection Procedures (B)
- Small Generator Interconnection (B)
- Generation Integration Services (A)

Legend: (A) Category A (B) Category B (C) Category C
TC-20 related business practices are identified with blue colored font

What are the next steps?

- Customers are encouraged to submit comments from today’s discussion to tech forum at techforum@bpa.gov. Please type “Business Practice” in the subject line of your email request
- Customers are encouraged to **consult their Transmission AE** with questions when planning to initiate a business practice proposal or on the business practice process overall
- Customers may also call the new dedicated transmission business practice phone number at 833- 272- 8972. You may also find this information on our external business practice website at <https://www.bpa.gov/transmission/Doing%20Business/bp/Pages/Comments-and-Responses.aspx>
- Customers are encouraged to attend or call into the TC-20 Settlement Update meeting on September 19th where the next transmission business practices process update will be discussed

Losses

What has happened since the last update?

- Loss factors are moved to a new Schedule 11 in the TC-20 tariff
- Researching options for returning losses:
 - The OATI loss module is expensive to maintain and frequently malfunctions
 - Administering the loss obligations and fulfillment of the obligation is complex and resource intensive
 - The value of energy provided does not align with the return value 168 hours later
 - The 168-hour delay for returns creates load uncertainty on the FCRPS

What has happened since the last update (continued)?

Factors BPA is considering for making its decision:

- On-going system maintenance costs
- Administrative costs to customers and BPA
- Use of ATC
- Ease of managing deviations and imbalances
- Cost recovery for provided losses
- Industry recognized return option
- Impact on existing contracts

Possible Return Options

- Status quo, financial only, combination concurrent-separate tag /financial

Are there any new change impacts?

- If financial only option is selected, then we anticipate moving the financial rate to the Gen Inputs portion of the BP rate case
- If concurrent/financial combo is selected, then we would need a transition period for process/business changes
- Calculation Methodology/Granularity – Will be reviewed for the TC-22 process

What is the current schedule?

- If financial only option is selected then we would follow status quo until completion of the BP-22 rate case process
- If concurrent/financial combo is selected then we would work out a transition period for change

What are the next steps?

- BPA would like your feedback on the Loss Return program by June 21 to inform our decision.
 - See Appendix A
- Anticipate a decision in the fall of 2019
- The decision will drive the project timeline for implementation and change management

Appendix A

- Answers to the following questions are sought to inform BPA and understand impacts to customers in the event there are changes to the Loss program
 - If BPA moved to a “Financial Only” return option,
 - How would you categorize this potential change (e.g. significant, moderate, minimal)?
 - Please share the anticipated impacts to convert and change your current systems / processes
 - If BPA continued to allow customer election of In-Kind returns or Financial returns but changed In-Kind returns to Concurrent Separate-Tag,
 - How would you categorize this potential change (e.g. significant, moderate, minimal)?
 - Please share the anticipated impacts to convert and change your current systems / processes
 - If you joined the EIM, did you change the method in which Losses are returned?
 - What method is currently utilized?,
 - Please describe why you changed methods.
 - What additional information would you like BPA to provide on the above two options?
- Send feedback to techforum@bpa.gov subject line “Losses”

Queue Management

Ultimate Resource and Load Information

(AKA Ultimate TSR Gen/Load)

What change was proposed?

In April 2018, BPA posted proposed changes to the Requesting Transmission Service and TSR Study and Expansion Process business practices to require customers to provide the ultimate resource and load information via a Data Exhibit as part of a Completed Application.

The team also held a customer call regarding the BP change in May 2018.

Why did we propose the change?

BPA identified a gap in how it implements *pro forma* OATT section 17.2 and 29.2 regarding ultimate resource and load information.

- BPA does not require the ultimate resource and load information as part of a completed application
- BPA does require customers to provide the additional information for Transmission Service Request (TSRs) participating in a study

What were the change impacts?

BPA customers were not supportive of BPA requesting the ultimate resource and load information via a Data Exhibit as part of the Completed Application:

- Customers stated this process is redundant to study practices already in place by BPA and that the information on a Long Term TSR is sufficient to satisfy 17.2
- Customers stated for off-system Gen/Load, Ultimate Resource and Load data points required in the PTP data exhibit are not necessary for Gen/Load outside of BPA's BA
- Customers do not believe this request is in line with industry best practices
- PTP customers stated marketers cannot provide this information
- Customers requested that if these data exhibit requirements are pursued, there should be a longer stakeholder process

What is the proposed change schedule?

- BPA has withdrawn the proposed changes to the Requesting Transmission Service and TSR Study and Expansion Process business practices posted on April 20, 2018
- BPA intends to dialogue with Customers about this issue during the TC-22 Customer Workshops

What are the next steps?

Customers can engage with BPA during the
TC-22 Customer Workshops

Queue Management

Rollover and Remainder Changes

What has happened since the last update?

BPA has withdrawn the BP redlined proposed business practice:

- Reservation Priority Long-Term Firm Service V12
- Redirect V24

Are there any new change impacts?

- BPA decided to withdraw the proposed changes in response to customer comments requesting that BPA not implement them until there is a more regular cadence to the cluster studies and anticipated changes to the long term ATC process have been finalized
- Customers can follow BPA's progress on the cluster study and long-term ATC process via the LT ATC Commercial updates and by monitoring the [LT ATC](#) and [TSEP websites](#).

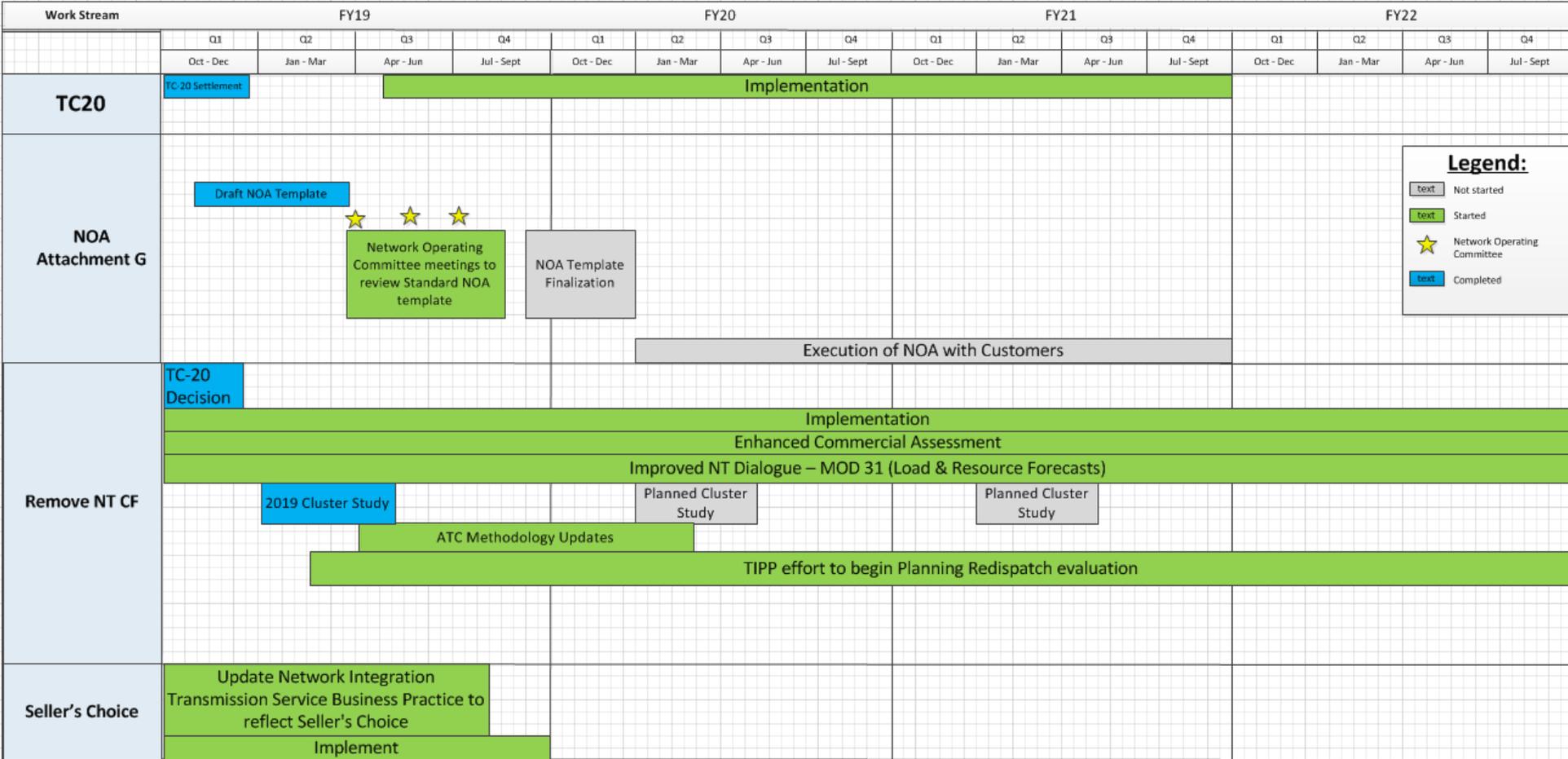
What is the current schedule?

- Repost the proposed business practice changes spring/summer 2020
- Tentative implementation date 10/1/2020

Morning Break

Network Services Work Streams: Sellers Choice, NT Dialogue, NOA & Attachment G

NT Work Stream Roadmap



Product Conversions

Lunch Break

Hourly Firm - Draft Monitoring & Evaluation Plan

What is the current schedule?

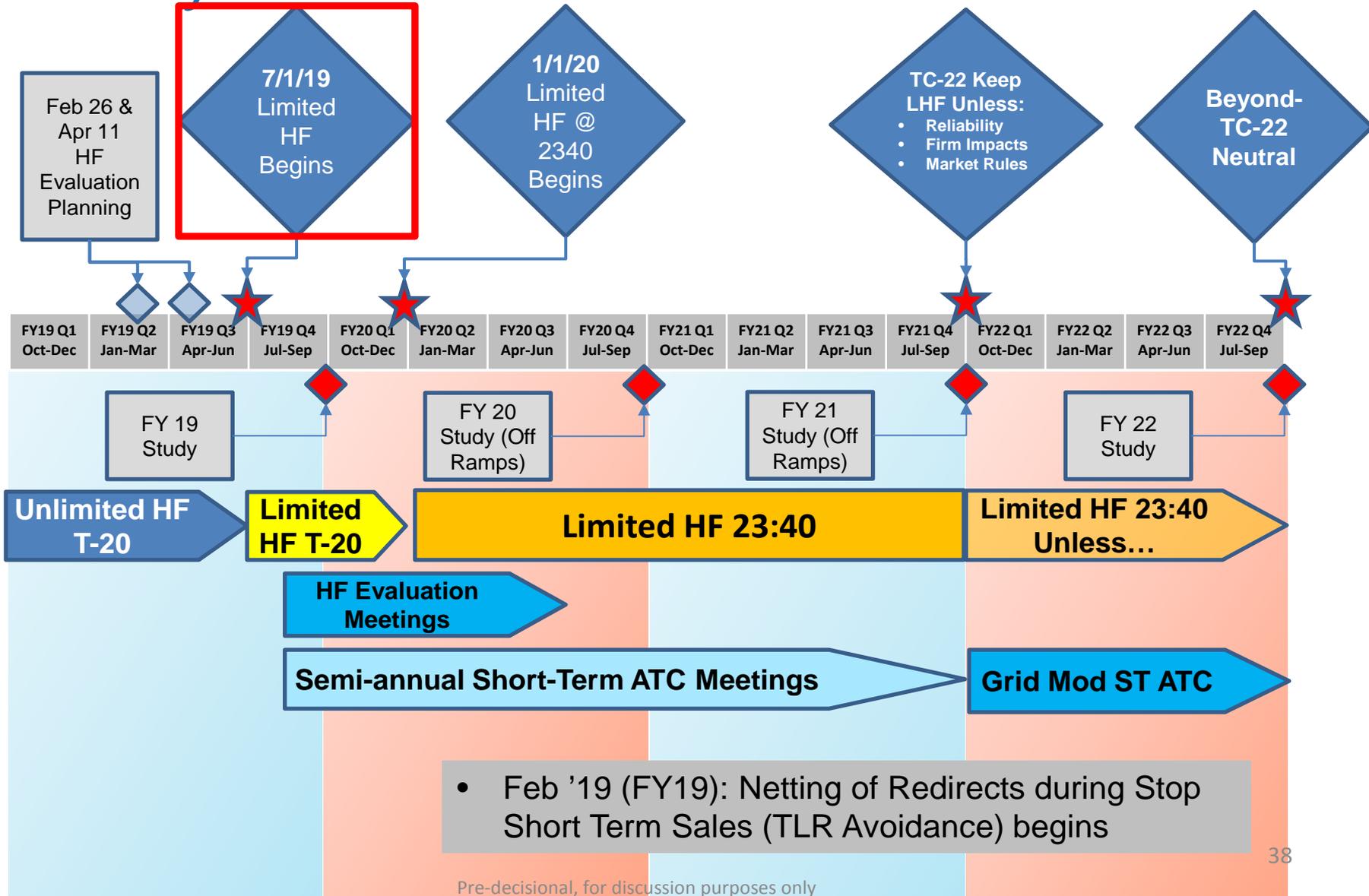
7/1/19:

- Begin limiting the Hourly Firm product to Bonneville's posted available transfer capability (ATC)
- Post the Hourly Firm Monitoring & Evaluation Plan for customer comments

8/7/19:

- Customer Comment period ends

Hourly Firm & Short-Term ATC Timeline



Afternoon Break

Proposed ATC Changes

Short-Term Available Transfer Capability Project

Why are we proposing the change?

TC-20 settlement stated that by October 1, 2021, BPA would use reasonable efforts to develop an accurate and transparent ST ATC methodology and would:

1. Begin evaluation in the second quarter of 2019 and identify any potential improvements to ST ATC that could be implemented before October 1, 2021
2. Hold a ST ATC workshop in the fourth quarter of 2019, and second and fourth quarters of each fiscal year until October 1, 2021
3. Provide a review of timelines and parameters for making specific changes to the ST ATC methodology in the workshops
4. Continue to calculate and post hourly ATC values

What is being changed?

Given the nature of the drivers for this project, the ST ATC project is being structured in the following manner:

- The project is part of the [Grid Modernization](https://www.bpa.gov/Projects/Initiatives/Grid-Modernization/Pages/Grid-Modernization.aspx) portfolio at BPA
 - <https://www.bpa.gov/Projects/Initiatives/Grid-Modernization/Pages/Grid-Modernization.aspx>
- Given the [TC-20 settlement](https://www.bpa.gov/transmission/CustomerInvolvement/TC20Implementation/Pages/default.aspx) connection, BPA will be using the TC-20 communication format, with customer workshops, as work unfolds on this effort
 - <https://www.bpa.gov/transmission/CustomerInvolvement/TC20Implementation/Pages/default.aspx>

A core team from Transmission, with support from Grid Mod, has been established:

- Project Sponsors: Michelle Cathcart, Tina Ko and Meg Albright
- Product Owners: Kevin Johnson and Margaret Olczak

What is being changed?

In response to the Pro Forma Gap Analysis and TC-20 settlement commitments on ST ATC, BPA has:

1. Created a ST ATC organization within Transmission Operations
2. Begun work to define incremental improvements that can be made to BPA's ST ATC

What are the change impacts?

1. BPA will present proposed ST ATC improvements in customer meetings/workshops
 - a. BPA will not have all the details of the proposed improvements at these initial meetings
2. Customer comments on the proposed improvements will be accepted in a 20 business day comment period following customer meeting
 - a. Send comments to techforum@bpa.gov
 - b. BPA will respond to comments within 20 business days after comment period closes
3. BPA will update customers on the implementation information and dates as this information becomes available
 - a. BPA will communicate these details via tech forum notices, and can hold additional customer meetings for more involved changes

What are the change impacts?

4. BPA's ST ATC methodology documents, the ATCID and TRMID, will be updated as needed to reflect ST ATC improvements
 - a. Documents will be posted prior to implementation of any changes
 - b. Comments received on proposed ST ATC improvements from customer workshops will be considered in the ATCID and/or TRMID changes
5. On occasion, BPA might need to update the ATCID or TRMID on short notice, in order to maintain NERC-compliant documents
 - a. In these instances, the ATCID and/or TRMID will be updated and changes will be communicated via a tech forum notice
 - b. These types of changes should be infrequent

What are the change impacts?

The ATC Calculation (from MOD-029-2a) is:

When calculating firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm:

$$\text{ATC} = \text{TTC} - \text{ETC} - \text{CBM} - \text{TRM} + \text{Postbacks} + \text{Counterflows}$$

Where:

ATC is the firm Available Transfer Capability for the ATC Path for that period.

TTC is the Total Transfer Capability of the ATC Path for that period.

ETC is the sum of existing firm commitments for the ATC Path during that period.

CBM is the Capacity Benefit Margin for the ATC Path during that period.

TRM is the Transmission Reliability Margin for the ATC Path during that period.

Postbacks are changes to firm Available Transfer Capability due to a change in the use of Transmission Service for that period, as defined in Business Practices.

Counterflows are adjustments to firm Available Transfer Capability as determined by the Transmission Service Provider and specified in their ATCID.

What are the change impacts?

BPA has identified the following initial ST ATC improvements:

1. Update Power Transfer Distribution Factors (PTDFs) for network paths more frequently
2. Eliminate the impacts of unscheduled Network Integration Transmission Service of BPA's adjacent Transmission Service Provider areas (noted as RETC in ATCID) from BPA's ST ATC on the network paths
3. Implement updated Total Transfer Capability (TTC) and Transmission Reliability Margin (TRM) studies for West of Garrison E>W
4. Convert West of Hatwai from an External Interconnection to a Flowgate

What are the change impacts?

Improvement #1: Update PTDFs for network paths more frequently

1. Currently, BPA uploads PTDFs to OATI systems once per day
 - a. PTDFs are used to calculate a portion of the ETC, and therefore ST ATC, for BPA's network paths
 - b. PTDFs are also used to calculate the impacts of new Transmission Service Requests (TSRs) across network paths
2. PTDFs are based on outage-informed system topology at the time of upload and forecasted federal generation pattern (for weighted "BPA Power" PTDF)
3. BPA would like to increase the frequency of PTDF uploads to OATI systems
 - a. This will allow PTDFs to capture an updated federal generation pattern for the "BPA Power" and an updated system topology throughout the day
4. BPA does not have details on how often PTDFs will be updated yet but will share this info as soon as it is available

What are the change impacts?

Improvement #1 (cont.): Update PTDFs for network paths more frequently

5. Customer impacts
 - a. Since PTDFs are used to calculate the network impacts for TSRs customers submit to BPA, customers may see different approval responses to the same TSR based on the set of PTDFs in use at the time their TSR is submitted
 - b. Customers will see changes to ST ATC for the network paths after new PTDFs are uploaded to OATI systems, as the uploads will trigger a recalculation of the ETCs, and therefore ST ATCs, for the network paths
6. BPA expects to implement this improvement by end of September 2019

What are the change impacts?

Improvement #2: Eliminate the impacts of unscheduled Network Integration Transmission Service of BPA's adjacent Transmission Service Provider areas from BPA's non-firm ST ATC for its network paths

1. Currently, these impacts are included in BPA's real-time horizon non-firm ETC, and therefore real-time horizon non-firm ATC, for the network paths
 - a. Process is a hold-over from when BPA was using NERC's MOD-030 methodology for its network paths
 - b. BPA believes that this data element should not be included in BPA's non-firm ST ATC for network paths as it is not related to commitments that BPA has made across its system
2. BPA would like to stop performing this process and expects a more accurate non-firm ST ATC as a result of this change
3. BPA expects to implement this improvement by September 2019

What are the change impacts?

Improvement #3: Implement updated TTC and TRM studies for West of Garrison E>W

1. Initial Transmission Operation studies show that BPA can increase the TTC across West of Garrison E>W to 2200 MW
 - a. 2200 MW is based on an all lines in service assumption, and does not consider ownership shares on the path
2. Operational studies assume a favorable generation pattern across the path
 - a. Due to this, BPA will implement a Firm TRM across West of Garrison E>W, in conjunction with the TTC increase, to account for uncertainties in generation dispatch
 - b. Firm TRM will be in place when TTC is above 2000 MW
3. Customer Impacts
 - a. Customers will begin seeing updated TTC and TRM values for West of Garrison E>W upon implementation
4. BPA expects to implement this improvement by mid-August 2019

What are the change impacts?

Improvement #4: Convert West of Hatwai from an External Interconnection to a Flowgate (use flow-based analysis to calculate Short Term ETC)

1. Short Term ATC team expects to adopt a flow-based analysis to calculate Short Term ETC across West of Hatwai, based on the findings of the Long-Term ATC team
2. Customer impacts
 - a. Increase in Short Term ATC across West of Hatwai is expected
 - b. BPA will curtail in real-time using iCRS, as is used for the other network ATC Paths (currently West of Hatwai is curtailed prior to flow using a one-to-one methodology)
3. BPA expects to implement this Short Term improvement in Fall of 2019 (will coincide with system update for winter 2019 ETC values across the network paths)

What are the next steps?

- Comments on the ST ATC proposed improvements are due in 20 business days – comments will be accepted until July 12, 2019
- BPA will review comments and reply by August 9, 2019
- BPA will let customers know when further details and exact implementation dates are available via tech forum email
- BPA will update ATCID/TRMID documents prior to implementing each of these changes
- Please send Questions/Comments to techforum@bpa.gov

Long-Term Availability Transfer Capability Methodologies

What has happened since the last update?

- *ATC Methodologies for the Planning Time Period* (beyond 13 months) has been posted with redlines for public comment to meet several objectives:
 - Streamline the document and make updates to model inputs easier to incorporate
 - Clarify language and remove redundancies
 - Prepare for the implementation of conversion of West of Hatwai from an External Interconnection to a Flowgate
- Annual Long-Term ATC Base Case Update has begun

Are there any new change impacts?

- Data and information proposed for removal from the *ATC Methodologies for the Planning Time Period, Version 15* will instead be posted at:
<https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Pages/BaseCaseUpdates.aspx>
- BPA has chosen to convert West of Hatwai from an External Interconnection to a Flowgate
 - This requires use of flow-based analysis to calculate Long-Term Existing Transmission Commitments (ETC) to determine the ATC values
 - This new Flowgate is constrained during light-load conditions and will necessitate inclusion of an off-peak case in ATC studies
 - West of Hatwai will be included in the annual Long-Term ATC Base Case Update; however BPA will continue to use the current External Interconnection ATC values until IT systems and processes are ready

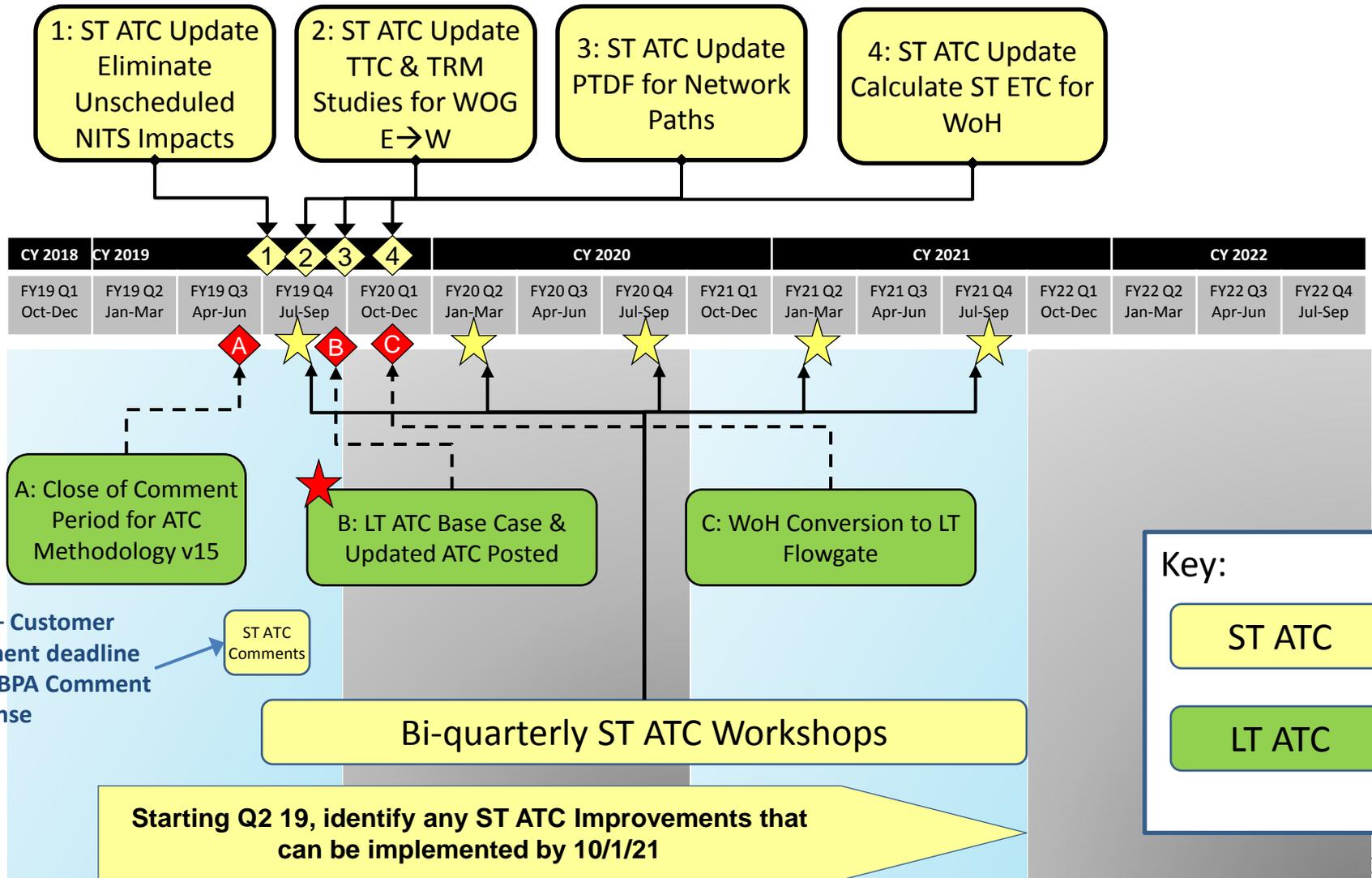
What is the current schedule?

- June 25, 2019: comment period for changes to the *ATC Methodologies for the Planning Team Period, Version 15* closes
- Late summer 2019: updated Long-Term Firm ATC values will be posted and BPA will hold a public meeting on the results
- Fall 2019: West of Hatwai conversion to a Flowgate is implemented

What are the next steps?

- BPA will evaluate feedback received in response to proposed changes to the *ATC Methodologies for the Planning Team Period, Version 15*
 - The bulk of the proposed redlines are expected to become effective prior to the release of the Long-Term ATC Base Case Update in late summer
 - Redlines to execute the West of Hatwai conversion are expected to become effective in the Fall
- BPA will schedule a public meeting to release the Long-Term ATC Base Case Update no later than October

Consolidated ST & LT ATC Timeline



Wrap up and Next Steps

Upcoming Customer Engagement Dates

- June 24: NOC Meeting
- August 6: TC-20 Customer Workshop
- August 15: NOC Meeting
- September 19: TC-20 Customer Workshop

TC-20 Settlement Commitments

SETTLEMENT AGREEMENT #	TC-20 Settlement Commitments	DATE
(01)	Incorporate Section 9 Tariff and Rate Modifications in the Tariff	Complete
(02)	Implement hourly firm limited by ATC	7/1/19
(02.a)	Restrict real-time hourly firm reservations at 2340	1/31/20
(02.d)	Begin monitoring and evaluating hourly firm performance	Have begun & On going activity
(02.d)	Conduct one or more workshops to develop a plan for monitoring and evaluating hourly firm product	Complete
(02.d)	Develop a plan for monitoring/evaluating hourly firm and consider comments	In progress
(02.d)	Share results of the evaluation twice with customers	7/1/20
(02.d.i)	Evaluate HF product	
(02.d.ii)	Provide responses to customer queries & provide transparent data	
(o2.d.iii)	Conduct HF analysis	
(02.e)	Develop an accurate and transparent short-term ATC methodology	10/1/21
(02.e.i)	Begin identifying potential ST ATC improvements that could be implemented by 10/1/21	Have begun & On going activity
(02.e.ii)	Hold ST ATC workshops - 4th qtr 2019 and 2nd and 4th qtrs of each fiscal year until 10/1/21 - BPA fiscal year?	10/1/21
(02.f)	Apply preemption and competition to daily and hourly firm, including redirects IF OATI implements relevant NAESB standards	FERC issued an NOPR on 5/16/19
(02.f)	Evaluate implementing preemption and competition to daily and hourly firm, including redirects	Pre-TC22 Workshops
(02.g)	Update Network Integration Transmission Service Business Practice to include Seller's Choice	7/31/19
(02.g)	Implement Seller's Choice	10/1/19
(02.h)	Implement Netting of Redirects under Stop Sales Events (TLR Avoidance)	Complete
(02.i)	Provide at least 2 conversion windows for customers desiring to switch long-term firm products from NT to PTP or from PTP to NT	See Product Conversion Timeline
(02.k)	Implement NT Redispatch Cost Allocation changes	BP-22/24
(03)	Implement changes to the Business Practice Process	Designing process charts and standard operating procedures
(04)	Incorporate Schedules 3, 9, 10 (Ancillary Services) in the Tariff	Complete
(05)	Incorporate Section 12.1 Dispute Resolution in the Tariff	Complete
(06)	Implement changes to NT service - NT Conditional Firm and Network Operating Agreement	In process, see NT Roadmap for details
(06.a)	Implement NT Service according to the NT Service Overview flowchart & Workstream Roadmap	In process, see NT Roadmap for details
(06.a)	Remove NT Conditional Firm from Tariff	Complete
(06.b)	Create a template Network Operating Agreement, revise Attachment G, and negotiate individual agreements	In process, see NT Roadmap for details
(07)	If non federal resources apply, then BPA to hold public process to determine appropriate rules and protocols associated with non-federal redispatch	
(07)	Revise NT Redispatch language & remove Attachment M as reflected in Attachment 2	Complete
(07)	Revise NT Redispatch Business Practice through the agreed upon BP process	Draft language being finalized, anticipate posting in June
(08)	Implement modified Generator Interconnection procedures	
(08.a)	Develop a Business Practice to implement specific reforms in FERC Order Number 845 related to Generator Interconnections	10/1/19
(08.b)	Incorporate Attachment L and N to remove references to filing tariff and unexecuted LGIA with FERC	Complete
(09)	Incorporate new Schedule 11 to document the Real Power Loss Factor	Complete
(10)	Remove the price cap for assignment or transfer of Transmission Service	Complete
(12)	Begin a stakeholder process to develop a process to study requests on the southern intertie	12/31/19
	Incorporate Attachment K Transmission Planning Process in the Tariff	Complete