

# Response to Customer Comments – Conditional Firm Transmission Service

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BPA Transmission Business Practice

**Version 22**  
**Posted 4/12/2019**

# Response to Customer Comments – Conditional Firm Transmission Service

## Version 22

This document contains customer comments and BPA Transmission Services’ response to the **Conditional Firm Transmission Service, Version 22** posted for review from **November 6, 2018 to December 6, 2018**.

Bonneville’s decision is to implement the proposed [Conditional Firm Transmission Service](#) business practice, Version 22 with an effective date of [DATE].

For more information on business practices out for comment, visit the BPA Transmission Business Practices [Comments and Responses page](#).

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## A. Orion Renewables

Orion Renewables supports the changes in Version 22 of the Conditional Firm Transmission Service Business Practice. The provision of Conditional Firm Service (CFS) on the West of Garrison flow gate will encourage the development of Montana’s vast, but transmission-constrained, wind resources. Orion encourages BPA to continue working on its business practices and systems so that Section N. of Version 22 which does not allow for CFS on an internal flow gate and an external interconnection in a single transmission reservation can be eliminated as soon as possible.

Orion appreciates BPA’s continuing efforts to address issues identified in the Montana Renewables Development Action Plan (MRDAP), including the addition of West of Garrison CFS in Version 22 of the business practice.

### **BPA Response**

BPA appreciates your feedback regarding Version 22 of the Conditional Firm (CF) Business practice and BPA’s expansion of Conditional Firm capabilities on External Interconnections. At this time, BPA does not have the processes in place to offer CF service for a single transmission reservation that requires CF on both an internal flowgate and external interconnection. BPA is working to resolve this issue in 2019. BPA will continue to engage customers and the region as it evaluates modifications to CF service capabilities.

## B. Renewable Northwest

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Renewable Northwest writes in support of the Bonneville Power Administration's ("BPA") proposed changes to the Conditional Firm Transmission Service Business Practice (Version 22). Conditional Firm service is an important transmission product that uses scarce transmission capacity efficiently and is especially important in the context of an increasing number of variable energy resources interconnecting to BPA's system. For these reasons, expanding the number of Paths that Conditional Firm Service can be used on is a positive step forward for BPA and the region.

The specific Business Practice amendment contained in Version 22 that enables BPA to offer Conditional Firm Service on the West of Garrison Path is particularly important for addressing transmission barriers to accessing Montana's high-value wind energy resources. Renewable Northwest appreciates and supports this change.

Renewable Northwest encourages BPA to continue to move in the direction of expanding the geographic applications, use cases and value of Conditional Firm Service. Renewable Northwest supports addressing the limitation in Section N of the proposed Business Practice as soon as possible. Enabling transmission service offers that require Conditional Firm Service over both the BPA network and an intertie will expand the applicability and the value of BPA's Conditional Firm Service.

### **BPA Response**

BPA appreciates your feedback regarding Version 22 of the Conditional Firm (CF) Business practice and BPA's expansion of Conditional Firm capabilities on External Interconnections. At this time, BPA does not have the processes in place to offer CF service for a single transmission reservation that requires CF on both an internal flowgate and external interconnection. BPA is working to resolve this issue in 2019. BPA will continue to engage customers and the region as it evaluates modifications to CF service capabilities.

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