

JOINT COMMENTS OF THE NT CUSTOMER GROUP REGARDING BPA TRANSMISSION BUSINESS PRACTICES

These comments are submitted to the Bonneville Power Administration (“BPA”) on behalf of the Eugene Water and Electric Board (“EWEB”), Northwest Requirements Utilities (“NRU”), PNGC Power, and Western Public Agencies Group (“WPAG”) (collectively, the “NT Customer Group”) regarding the following proposed Transmission Business Practices:

- Transmission Service Requests Evaluation, Version 1; and
- Preemption of Short-Term Requests and Reservations, Version 3.

1. Comments on Transmission Service Requests Evaluation Business Practice, Version 1.

There are several references to “NT forecasted TSR(s)”, otherwise known as FTSRs, throughout the Long-Term Firm sections of the Transmission Service Requests Evaluation Business Practice. While we agree that the Business Practice should apply to FTSRs, it should also equally apply to all NT LTF TSRs. Therefore, we request that BPA replace all references to “NT forecasted TSR(s)” to “Long-Term NT TSRs”, which would cover FTSRs as well.

2. Comments on Preemption of Short-Term Requests and Reservations, Version 3.

The pro forma right of NT customers to preempt competing TSRs has an elevated importance now that BPA has limited its hourly firm product. Pursuant to § 2.f of Attachment 1 to the TC-20 Settlement, BPA must “as soon as practicable . . . apply preemption and competition to daily and hourly firm, including redirects, if OATI implements NAESB standards to adopt FERC policy under *Entergy Services Inc.* 148 FERC ¶ 61,209.” We note that FERC issued Order 676-I on February 4, 2020 adopting the revised NAESB standards for implementing the *Dynegy* policy for redirects that was incorporated into FERC’s *Entergy Services Inc.* decision referenced in the TC-20 Settlement.¹ Under Order 676-I, public utilities subject to FERC’s jurisdiction had 90 days to comply from the date Order 676-I was issued. Although BPA is not generally subject to FERC’s jurisdiction, that time period has lapsed, and BPA has yet to revise the Short-Term Requests and Reservations Business Practice in light of Order 676-I, including in the most recent proposed revision to the business practice. We respectfully request an update from BPA as to where OATI is in the process of implementing these standards now that they have been adopted by FERC. We also respectfully request details as to BPA’s plan and timeline for applying, “as soon as practicable”, preemption and competition to daily and hourly firm in accordance with its obligations under the TC-20 Settlement and its Tariff.

¹ Standards for Business Practices and Communication Protocols for Public Utilities, Order 676-I, 170 FERC ¶ 61,062 (2020).