

May 31, 2019

Via email:

techforum@bpa.gov

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of PacifiCorp Regarding BPA Draft Requesting Transmission Service Business Practice

PacifiCorp writes here to provide the following comments on BPA's draft Requesting Transmission Service Business Practice (Version 36) ("Draft BP").¹

It has come to PacifiCorp's attention that there may be some discrepancies between the Draft BP's timing provisions and certain timelines noted in BPA's Tariff. For example, the chart in Section F.3, notes that requesting transmission customers have 4 days to respond to competing requests for firm monthly point-to-point transmission service. In contrast, Section 13.2(iv) in BPA's Tariff states in relevant part that

A longer term competing request for Short Term Firm Point-To-Point Transmission Service will be granted if the Eligible Customer with the right of first refusal does not agree to match the competing request within *24 hours* (or earlier if necessary to comply with the scheduling deadlines provided in section 13.8) from being notified by the Transmission Provider of a longer-term competing request for Short-Term Firm Point-To-Point Transmission Service.²

PacifiCorp agrees that that Tariff language should govern in the event of a conflict with a Transmission Provider's business practice, but that conflicts should be avoided as much as possible so that customers are not caught by surprise or unfairly prejudiced. Accordingly, PacifiCorp requests that BPA correct the above-noted discrepancy, and review the Draft BP broadly for other potential similar discrepancies and revise accordingly.

* * *

Nothing contained in these Comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or provided under BPA's Tariff or otherwise under contract. PacifiCorp appreciates BPA's review of these comments and consideration of the recommendations contained herein. By return e-mail, please confirm BPA's receipt of these comments.

¹ Available at <https://www.bpa.gov/transmission/Doing%20Business/bp/Redlines/Clean-Draft-Requesting-Transmission-Service-BP-V36.pdf>

² (emphasis added). This language is identical in both BPA's currently-effective Tariff and the Settlement Tariff that takes effect October 1, 2019.