

Network Integration Transmission Service (NT)

BPA Transmission Business Practice

Version 10
TBD

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The Network Integration Transmission Service (NT) Business Practice outlines processes and procedures specific to Network Integration Transmission Service.

BPA Policy References

- [OATT Reference: Section III. Network Integration Transmission Service; Attachment G](#)
- [Rate Schedule Provisions: Network Integration Rate](#)

For more information, visit the [BPA Transmission Business Practices webpage](#) or submit questions to techforum@bpa.gov.

Table of Contents

A. Requesting NT.....	1
B. Load & Resource Forecasts.....	2
C. Out-of-cycle Load & Resource Forecasts.....	4
D. Reserving Transmission Capacity for Forecasted Non-federal Network Resources	4
E. Designation of a New Network Resource	5
F. Additional Requirements for Designating Network Resources.....	6
G. Undesignation of a Network Resource	10
H. Designation of New Network Load	11
I. Using Secondary Service	12
J. Use of Point-to-Point Service to Serve Network Load	12
K. Reservation Priority for NT Service Agreements	12
L. Reservation Priority for Designated Network Resources	12

A. Requesting NT

1. An Eligible Customer that is not yet a BPA Transmission Services customer must complete the steps on the [Becoming a BPA Transmission Services Customer](#) webpage.
2. Per Section 29.2 of the OATT, an Eligible Customer seeking NT must submit the following over OASIS:
 - a. Transmission Service Request (TSR)
 - b. NITS Application. Refer to the Network Integration (NT) Transmission Service TSR Procedures.

3. The Eligible Customer must also provide the following supplemental information as part of the application for NT:
 - a. New Network Load Supplemental Form
 - b. ~~Ten-year~~Ten-year load and resource forecast.
4. The Eligible Customer's Transmission Account Executive will help coordinate the process of providing the information required in Section 29.2 of the OATT.

B. Load & Resource Forecasts

1. The NT Dialogue is the annual update of a Network Customer's ~~ten-year~~ten-year load and resource forecast as required by Sections 29.2 and 31.6 of the OATT and the NERC MOD-031 Reliability Standards.
 - a. The data submitted and/or confirmed by the Network Customer ~~informs~~ BPA Transmission Service's long-term transmission planning and future TSR Study and Expansion (TSEP) cycles.
 - b. The Network Customer's BPA forecaster works with the Network Customer to meet the annual forecast update obligation.
2. The NT Dialogue is conducted annually.
 - a. ~~The timing of the NT Dialogue for a Slice/Block customer may be adjusted to accommodate forecasting requirements in the Slice/Block power contract.~~
 - b. BPA Transmission Services will notify Network Customers of the timing of the upcoming NT Dialogue in the Network Operating Committee (NOC) and by email to Network Customers.
 - c. BPA Transmission Services will provide updates, changes, and instructions for the NT Dialogue.
 - d. BPA Transmission Services ~~will conduct the NT Dialogue on an annual basis, but may adjust the timing of the NT Dialogue, but it will always occur annually in consultation with the Network Operating Committee NOC.~~
3. The Load and Resource Consolidated Data Collection Tool (LaRC) is a workbook that provides detail such as forecast loads and historical loads, and non-federal resource forecasts.
 - a. Network Customers are not required to submit federal resource forecasts in the LaRC. The ~~federal resource forecasts for federal resources is are~~ provided under the requirements of the Network Customer's power contract.
 - b. BPA may change the LaRC from time to time to improve the NT Dialogue. ~~Changes will be communicated prior to the start of the annual NT Dialogue.~~
4. BPA prepares the LaRC by populating it with the current BPA load forecast information and non-federal resource encumbrance(s).
5. The LaRC is sent to all Network Customers ~~at the same time via email (if available) along with an instruction letter.~~
6. The Network Customer must review the LaRC and provide any updates or changes ~~with an explanation.~~

Commented [A1]: Generally, this section is intended to address "Load" and Resource Forecasts, but provides little to no guidance on how load forecasts are processed.

Commented [A2]: Please define what is meant by "informs".

Commented [A3]: Load Following customers should be provided the same accommodation.

Commented [A4]: This statement is unnecessary.

Commented [A5]: This statement is unnecessary assuming BPA provides similar treatment to Load Following customers under B.2.a

Commented [A6]: Please define what specific Regional Dialogue requirements are being referenced here.

Commented [A7]: Please define the specific timeframe for when changes will be communicated prior to the start of the NT Dialogue.

Commented [A8]: Please define the specific timeframe for when the LaRC will be sent.

Further, it is not clear what is meant by "at the same time" via email and to whom it will be sent..

~~The reviewed LaRC, revised if needed, should be returned~~ to BPA by the due date specified in the letter. The due date will not be less than 30 days from when the request was sent.

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- a. In the event a Network Customer is working with a third party for planning and completion of the LaRC, the Network Customer is responsible for ensuring the information in the LaRC is accurate to the best of their knowledge and submitted by the due date.
- 8. The Queue Time for evaluating the non-federal resource forecast is the time BPA receives the email containing the LaRC.
- 9. If the Network Customer does not return the LaRC, BPA Transmission Services will roll forward any previously accepted forecasted non-federal Network Resources until an updated LaRC has been received. The Network Customer may provide an out-of-cycle update as specified below in Section C.
- 10. If BPA Transmission Services determines the LaRC is incomplete or deficient, BPA Transmission Services will notify the Network Customer and the Network Customer must remedy the LaRC within 5 Business Days of notification. If efforts to remedy the deficiencies are unsuccessful, BPA Transmission Services will roll forward any previously accepted forecasted non-federal Network Resources until an updated LaRC has been approved.
- 11. At the conclusion of the reviews, ~~the BPA forecaster~~ will publish a final load forecast (Agency Load Forecast).
- 12. ~~If the Network Customer forecasted non-federal resources,~~ BPA Transmission Services will create a CONFIRMED Forecasted TSR (FTSR) for each accepted non-federal Network Resource forecast to encumber capacity as indicated in Section D.
- 13. In the event that any portion of the non-federal resource forecast was not accepted, BPA will ~~discuss options with the Network Customer.~~

Commented [A9]: Please provide further guidance on the process for partial encumbrances.

~~discuss options with the Network Customer. BPA will~~ BPA Transmission Services will create one or more FTSRs in the STUDY status to reflect the unencumbered resources and MWs in the event that the Network Customer elects to proceed with a transmission study.

- a. An FTSR in STUDY Status reflects capacity that has not been encumbered, requiring further review and may be eligible to participate in a study.
- ~~b. In the event BPA Transmission Services offers a study agreement, the Network Customer may decline to participate, in which case the FTSR(s) will be DECLINED.~~
- 14. BPA Transmission Services will send a letter specifying the FTSR(s) and will identify other options if needed.
 - a. The letter will specify the TSR AREF associated with any FTSRs that have been created to encumber capacity.
 - b. Any restrictions for designating against the FTSR will be identified.
 - c. FTSRs that were replaced as part of this update will be identified.
 - d. In the event that the non-federal resource forecast could not be encumbered, the reason(s) and options will be provided. This could include the option to participate in a study.

Commented [A10]: Generally, BPA needs to define the timelines for when it will provide customers with notification that their FTSR encumbrances have been processed or not accepted.

Commented [A11]: Please define AREF.

Commented [A12]: The process for partial encumbrances should be included here.

C. Out-of-cycle Load & Resource Forecasts

1. If there is a change to the Network Customer's load or resource forecast the Network Customer should notify BPA as soon as possible.
 - a. The Network Customer should send an email with details of the change to: KSLF@bpa.gov.
 - b. The Network Customer's BPA forecaster and Transmission Account Executive should be copied on the email.
 - c. The Subject Line should be set to "Revision to Load and Resource Forecast Required – (Network Customer Name)."
2. [BPA Transmission Services will create a CONFIRMED Forecasted TSR \(FTSR\) for each accepted non-federal Network Resource forecast to encumber capacity as indicated in Section D.](#)
3. The Queue Time for evaluating an updated non-federal resource forecast is the time BPA receives the email (if applicable).

Commented [A13]: Generally, BPA need to expand this section to mirror the level of specificity and guidance that is provided in Section B for "in cycle" forecasts.

D. Reserving Transmission Capacity for Forecasted Non-federal Network Resources

1. A CONFIRMED Forecasted Transmission Service Request (FTSR), based on the evaluated and accepted forecasts as specified in Sections B and C above, provides an assurance of transmission availability if the identified non-federal resource is subsequently designated.
 - a. An FTSR is a Long-term Firm (LTF) NT TSR in OASIS.
 - b. An FTSR contains "NT DIALOGUE FTSR" in the Seller Comments field. Additional information may also be included in this field.
 - c. An FTSR identifies the forecasted MW per year for the next 10 years.
 - d. An FTSR in CONFIRMED Status reflects capacity that has been encumbered for the Network Customer.
2. When a designation against a previously forecasted non-federal Network Resource is accepted, the identified FTSR is adjusted to reflect the MWs that have been designated.
3. [Alternate Resource FTSRs may be created to reflect circumstances where a Network Customer forecasts two or more non-federal resources to serve the same Network Load without over-encumbering transmission capacity.](#)
 - [The Network Customer is responsible for identifying in the LaRC which Resource Forecasts that will be analyzed as Alternate Resource FTSRs.](#)
 - a. Each non-federal resource that is forecasted will have a separate FTSR with the same MW for each year.
 - b. Each FTSR will contain "Alternate Resource FTSR to <AREF,>" where each of the other Alternate Resource FTSRs are identified by AREF. Additional information may also be in this field.
 - c. The Network Customer may designate resources from any of the Alternate Resource FTSRs such that the cumulative total of designations does not exceed

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Commented [A14]: Generally, the Alternate Forecast concepts presented in section D need to be replicated in Section B and C so that customers understand that they must clearly identify which resources they deem to be "alternate forecasted resources" in their LaRC submittals in the NT Dialogue and "Out of Cycle" process.

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the MW of the largest single Alternate Resource FTSR.

- i. If the DNR is accepted, each of the Alternate Resource FTSRs are adjusted to reflect the MWs that have been designated.

Commented [A15]: Is this MW demand or flowgate impact?

4. When a resource forecast is accepted for the Mid-Columbia (Mid-C) area ~~rather than a specific resource~~, the FTSR will specify Columbia230 as the Source and BPAT.CHPD as the Point of Receipt (POR).
 - a. The Network Customer may designate a Network Resource against the FTSR using any of the following PORs: NWH, MIDCREMOTE, BPAT.CHPD (Chelan), BPAT.GCPD (Grant), or BPAT.DOPD (Douglas).
 - b. If a designation is made at any POR other than BPAT.CHPD, an ATC ~~check evaluation~~ will be performed netting the designated POR against the FTSR for BPAT.CHPD.
5. BPA Transmission Services will create a new FTSR to reflect any accepted forecast for non-federal resources BPA Transmission Services will replace any previous FTSRs for the resource.
6. A Network Customer may not create an FTSR in OASIS.
7. A Network Customer may designate a Network Resource against a CONFIRMED FTSR. See Section F Additional Requirements for Designating Network Resources.
 - a. If a Network Customer does not designate a Network Resource for which it has an FTSR at least 60 days prior to service commencement date, BPA will release the encumbered capacity back to the market on a rolling month basis.
8. BPA Transmission Services uses CONFIRMED FTSRs in the calculation of Available Transfer Capability (ATC) in accordance with the BPA's ATC Methodology.

Commented [A16]: This statement is unclear. Please provide further explanation.

E. Designation of a New Network Resource

1. To designate a new Network Resource, the Network Customer must submit a new TSR and a new DNR on OASIS.
 - a. For detailed information concerning submitting DNR requests, see Network Integration (NT) Transmission Service TSR Procedures.
 - b. For Hourly, Daily, Weekly, and Monthly designated ~~N~~network ~~R~~Resources, NT Customers may submit a Short-Term Firm (STF) NT TSR in accordance with the "Short-Term and Hourly TSR Process" section of the Requesting Transmission Service Business Practice. STF NT TSRs must be submitted in accordance with the BPA Transmission Services' reservation timelines specified in the "Reservation Timelines" section of the Requesting Transmission Service Business Practice.
 - c. For information concerning submitting NITS Applications and supplemental information for STF NT TSRs, see the Network Integration (NT) Transmission Service TSR Procedures. For Deposit and Processing Fee procedures and requirements, please refer to the Requesting Transmission Service Business Practice.
 - d. Queue time is established when the TSR is QUEUED on OASIS.
 - e. For LTF NT TSRs to designate Network Resources, a DNR must be submitted on OASIS no later than 5:00 PM, Pacific Prevailing Time (PPT) on the same Business Day in which the LTF NT TSR is QUEUED. For STF NT TSRs, a DNR must be submitted on OASIS no later than 5:00 PM PPT on the same Business Day in which the TSR is QUEUED, or before delivery, whichever is earlier. The

STF NT TSR may be CONFIRMED over OASIS before BPA Transmission Services may have an opportunity to review the STF NT TSR and the DNR. Therefore, although a STF NT TSR may be confirmed, BPA Transmission Services considers the NITS Application deficient if the NITS Application requirements are not met or are not submitted within the specified deadline.

- f. If a NITS Application fails to meet the requirements of the OATT, BPA Transmission Services will notify the Network Customer requesting service within 15 calendar days from the day the TSR is QUEUED and specify the reasons for such failure.
 - g. If, within 10 Business Days of notification, efforts to remedy the deficiencies through informal communications with the Network Customer are unsuccessful, BPA Transmission Services will Decline the NT TSR and the NITS Application.
 - h. For STF NT TSRs, BPA Transmission Services will annul a TSR if the DNR requirements are not met within the deficiency time period or before delivery, whichever is earlier.
2. In order to submit a LTF NT TSR or STF NT TSR to designate a Network Resource, Network Customers must satisfy the following conditions:
 - a. The Network Customer owns the resource, has committed to purchase generation pursuant to an executed contract, or has committed to purchase generation where execution of a contract is contingent upon the availability of transmission service under Part III of the OATT.
 - b. The Network Resource does not include any resources, or any portions thereof, that are committed for a sale of one year or more to non-designated third party load or otherwise cannot be called upon to meet the Network Customer's Network Load on a non-interruptible basis, except for purposes of fulfilling obligations under a reserve sharing program.
 3. A Network Customer must have any necessary Firm or Conditional Firm Transmission Service, which may include transmission arrangements with rollover rights, or must have a pending transmission service request for firm transmission on all intermediate transmission systems, including the source system, for the duration of the TSR.
 4. Network Customers must make a long-term designation of Network Resources, including a designation of a forecasted Network Resource for which the customer has a CONFIRMED FTSR, no later than 60 days prior to service commencement date.

Commented [A17]: Please identify the difference between a "NITS Application" and "DNR". If these terms have the same meaning, then please use choose one and apply consistently.

F. Additional Requirements for Designating Network Resources

1. When designating a previously forecasted non-federal Network Resource the following requirements apply:
 - a. A Network Customer must ~~make a long-term designation designate of a non-federal forecasted Network Resource no later than 60 days prior to service commencement date.~~

Commented [A18]: Please explain why this section applies only to "non-federal" resources.

Commented [A19]: Please confirm whether the following is true: A customer may in fact submit a TSR to designate a Network Resource within sixty days of service, but they lose any prior FTSR encumbrances, and BPA cannot guarantee it will process the request in time for service. If this true, then this section needs to be revised.

- b. To designate a previously forecasted Network Resource for which an FTSR has been CONFIRMED, the Network Customer must submit a LTF NT TSR and a DNR in accordance with section E Designation of a New Network Resource.
 - i. The LTF NT TSR must be as follows:
 - Request type must be ORIGINAL.
 - The Deal Ref field must be set to the A-Ref number of the FTSR.
 - The term must be within the Start and Stop Date parameters of the FTSR.
 - The Customer Comment field must be set to “TSR to designate a previously forecasted Network Resource.”
 - c. BPA Transmission Services will evaluate the LTF NT TSR and the associated FTSR to determine if transmission service can be provided.
 - d. A designation of a Network Resource for less than a year cannot be netted against an FTSR.
- 2. For the POR field of the OASIS Reservation Entry Form, the Network Customer may use the following PORs:
 - a. The POR of the identified On-System Generating Resource:
 - i. The POR of the generating resource may be Newpoint (NEWPOINTBPAT) if the point is not currently modeled on OASIS. See the Requesting Transmission Service Business Practice for more information on designating Newpoint.
 - ii. The POR for a generating resource located within a Load Serving Entity's distribution system is the point of interconnection between the Load Serving Entity and the BPA BAA.
 - b. BAA Delivery Point:
 - i. A BAA Delivery Point may only be used for Network Resources originating from outside the BPA BAA.
 - ii. If the originating BAA is interconnected with the BPA BAA, the Network Customer must use the BAA Point between the BPA BAA and the adjacent or nested BAA from which the Network Resource(s) originate.
 - iii. Network Resources must be delivered to the BAA Delivery Point on Firm or Conditional Firm transmission for the duration of the TSR. The TSR will be DECLINED if the Network Customer is unable to provide an AREF and an attestation for the upstream transmission at the time the DNR is submitted on OASIS. See section M of the Network Integration (NT) Transmission Service TSR Procedures.
 - c. If the upstream Firm or Conditional Firm transmission contract includes rollover rights which may be exercised during the duration of the NT TSR, the Network Customer must provide the AREF for the rollover TSR at the time the TSR is submitted and again within five Business Days of the rollover being CONFIRMED in order for the NT TSR to continue to be a valid DNR. The notification must be emailed to TxRequests@bpa.gov.
 - e-d. The Northwest Market Hub (NWH):

Commented [A20]: This section appears to leave out all on system generation that are not NEWPOINT or located in an LSE's service territory.

Commented [A21]: The customer may be unable to provide the attestation if the transmission (and corresponding resource ownership) is held by another party. Also, the upstream transmission may be on firm PTP, which would not include attestation.

- i. To qualify as a Network Resource, the energy must be delivered to the Northwest Market Hub on Firm or Conditional Firm transmission for the duration of the NT TSR and in accordance with iii below. Except for designations under Section F.2.d, below, the TSR will be DECLINED if the Network Customer is unable to provide an AREF ~~and an attestation~~ for the upstream transmission at the time the DNR is submitted on OASIS.
- ii. If the source is physically located within the BPA BAA, the Network Customer may only identify a single generating resource for each TSR and must provide a DNR for each resource. The TSR will be DECLINED if the Network Customer is unable to identify a specific source at the time the DNR is submitted on OASIS.
- ~~iii.~~ ~~For the Start Date and the Stop Date field of the OASIS Reservation Form, the Network Customer must use dates when the resource will be available on a non-interruptible basis to serve the Network Customer's lead.~~
- ~~iv-iii.~~ Except for Network Resources described under Section F.2.d, below, if the Network Resource is a generating resource physically located outside of the BPA BAA, the Network Customer must provide an AREF ~~and an attestation that for~~ the upstream transmission arrangements are Firm or Conditional Firm and identify the Balancing Authority Area Delivery Point in the NITS Resource Description of the DNR.
- ~~v-iv.~~ Except for Network Resources described under Section F.2.d, below, if the Network Resource is a power purchase agreement from generating resources physically located outside of the BPA BAA, the Network Customer must also identify the Balancing Authority from which the power will originate and the Balancing Authority Area Delivery Point in the NITS Resource Description of the DNR.

Commented [A22]: This requirement is applied to all Network Resources in the OATT, and as such does not need to be included here.

- ~~d-e.~~ TC-20 Implementation of off-system Seller's Choice Resources:
 - i. The Network Customer must submit a TSR over OASIS where:
 - The POR is one of the following:
 - NWH,
 - MIDCREMOTE,
 - BPAT.CHPD,
 - BPAT.GCPD,
 - BPAT.DOPD, and;
 - The Start Date is no earlier than October 1, 2019, and the Stop Date is no later than October 1, 2021.
 - ii. The Network Customer must submit a New NITS Resource over OASIS (see section E of the Network Integration (NT) Transmission Service TSR Procedures) following the normal process with the following specific information:
 - The Resource Class must be OFF_SYSTEM.

- The Source Area must be MIDC20.
 - The Effective Start Date must be no earlier than October 1, 2019, and the Effective Stop Date must be no later than October 1, 2021.
- iii. The Network Customer must submit a New NITS DNR over OASIS (see section F of the Network Integration (NT) Transmission Service TSR Procedures) following the normal process with the following specific information:
- The Resource Name must identify the same Resource Name created in the New NITS Resource entry.
 - The POR must be TC20.
 - The Effective Start Date must be no earlier than October 1, 2019, and the Effective Stop Date must be no later than October 1, 2021.
 - The Request Ref must identify the TSR number provided for the service to load.
- iv. The Network Customer may submit TSRs from more than one POR (as identified in F.2.d.i) to be associated with a single Seller's Choice contract.
3. NT Resource Demand
- a. Federal Resource Demand
- i. If the POR is the FCRPS and the demand varies over the term of designation, e.g.; a Load Following or Slice/Block contract.
 - Enter "99,999 MW" as the requested demand in the MW field of the TSR.
 - Enter the peak demand in the Customer Comments Field of the TSR.
 - ii. If the POR is the FCRPS and the demand is fixed, e.g.; a 10MW contract, the Network Customer should input the specific requested demand in the MW field of the TSR.
 - iii. If the Network Customer plans to displace an existing resource that is not FCRPS, the Network Customer should identify the resource being displaced in the Customer Comments field of the TSR.
- b. Non-Federal Network Resource Demand
- i. The NT Customer may submit a shaped monthly capacity profile.
 - ii. Each monthly MW value must be less than or equal to the peak demand listed in the associated Power Purchase Agreement.
4. The Network Customer must specify in the Customer Comments field of the LTF NT TSR or STF NT TSR "New Network Resource."
5. The term of the TSR may not exceed the term to which the Network Customer owns the resource or has rights to the resource.

6. The Stop date of the NT LTF TSR or NT STF TSR may be later than the termination date of the Network Customer's NT Service Agreement. However, if the Network Customer's NT Service Agreements is not renewed and subsequently terminates, then the Network Customer's DNRs that extend past the termination of the NT Service Agreement are no longer valid.
7. BPA Transmission Services will evaluate TSRs submitted on OASIS for NT service to determine whether transmission service can be provided. See the Long-term Firm Queue: Evaluation of Requests and Offer of Service Business Practice.
8. Behind the Meter Resource:
 - a. If a generating resource used to serve Network Load is a Behind the Meter Resource, the Network Customer must notify ~~BPA Transmission Services~~ by submitting ~~a DNR over OASIS, and an updated its 10-year Load and Resource Forecast as described in Section B or Section C.~~
 - i. No OASIS TSR or DNR is required for a Behind the Meter Resource.
 - ii. ~~The customer must notify BPA Transmission Services that the resource is a Behind the Meter Resource by entering the comment "Behind the Meter Resource" in the Customer Comment field of the DNR submitted over OASIS.~~
 - b. The integrated hourly sum of generation from a Network Customer's Behind the Meter Resources may not exceed the Network Customer's total Network Load for any given hour.
 - c. Refer to the Small Generator Interconnection Business Practice and/or the Large Generator Interconnection Business Practice for additional procedures.

Commented [A23]: Please provide a rationale for why customers must submit a DNR for Behind the Meter Resources.

Commented [A24]: Please identify the OATT or BP language that dictates a portion of a customer's resource located in its service territory cannot be designated as a Behind The Meter resource while the remaining portion is used to serve load outside the customer's service territory.

G. Undesignation of a Network Resource

1. To make third-party sales of one year or more from a DNR, or if output or contractual rights to a DNR cease, a Network Customer must first undesignate that Network Resource. A Network Customer must use PTP Transmission Service for third party sales.
2. A Network Customer may undesignate all or part of a DNR by submitting a request to terminate a DNR on OASIS.
3. Temporary Undesignation of a DNR.
 - a. See Section H. Temporary Undesignation of the Network Integration (NT) Transmission Service TSR Procedures.
 - b. The Network Customer forfeits its ATC rights during the period that the Network Resource or portion thereof, is temporarily undesignated.
 - i. A new TSR is required if a Network Customer elects to re-designate a resource prior to the end date of the Temporary Undesignation.
 - c. After the period of temporary undesignation, the Network Customer will retain its right to Transmission Service from the original DNR.
 - d. If no stop date is specified in the undesignation notice, BPA Transmission Services will consider the Network Resource to be permanently undesignated.

4. Permanent Undesignation of a DNR
 - a. See Section I. Indefinite (Permanent) Undesignation of the Network Integration (NT) Transmission Service TSR Procedures.
 - b. The Network Customer forfeits its reservation priority and ATC rights for any permanently undesignated Network Resources.
5. Upon permanent undesignation of a DNR, to designate a new Network Resource, the Network Customer must submit a new LTF NT TSR on OASIS.

H. Designation of New Network Load

1. The Network Customer must submit a LTF NT TSR and a new DNR for the new Network Load on OASIS. For detailed information on submitting NT requests, see the Requesting Business Practice. If applicable, the Network Customer must also submit a new Network Load Supplemental form.
2. For Deposit and Processing Fee procedures and requirements, please refer to the Requesting Transmission Service Business Practice.
3. For information about submitting a new DNR, see the Network Integration (NT) Transmission Service TSR Procedures.
4. Queue time is established when the TSR for a New Network Load is QUEUED on OASIS.
 - a. A new DNR must be submitted on OASIS no later than 5:00PM, PPT on the same Business Day in which the LTF NT TSR is QUEUED.
 - b. If a NITS Application fails to meet the requirements of the OATT, BPA Transmission Services will notify the Network Customer requesting service within 15 calendar days from the day the TSR is QUEUED and specify the reasons for such failure.
5. If, within 10 Business Days of notification, efforts to remedy the deficiencies through informal communications with the Network Customer are unsuccessful, BPA Transmission Services will change the OASIS status of the TSR and the NITS Application to DECLINED.
6. The Network Customer must specify in the Customer Comments field of the TSR "New Network Load."
7. The Network Customer must demonstrate sufficient resources to serve the New Network Load.
8. BPA Transmission Services will evaluate LTF NT TSRs submitted on OASIS for New Network Load to determine if transmission service can be provided. See the Long-term Firm Queue: Evaluation of Requests and Offer of Service Business Practice..
9. For detailed information on the submission and processing of TSRs, refer to the Requesting Transmission Service Business Practice.
10. For additional requirements for interconnecting New Network Load, refer to the Line and Load Interconnection Procedures Business Practice.

I. Using Secondary Service

1. ~~The Network Customer may use Secondary Service to deliver energy to Network Loads from resources that have not been designated as Network Resources.~~
2. ~~Secondary Service is a short term transmission product available in monthly, weekly, daily, and hourly increments.~~
3. ~~To obtain Secondary Service, the Network Customer must submit a TSR on OASIS.~~
4. ~~The Point of Delivery (POD) must be the Network Customer's Network Load.~~
5. ~~The Source and Sink are not required.~~
6. ~~The TSR must be submitted within the required reservation window as specified in the Requesting Transmission Service Business Practice.~~

Commented [A25]: BPA has yet to introduce any proposed modifications to Secondary Service in its customer workshops or Network Operating Committee meetings. Thus, we lack any context or justification for why BPA is including this new section, and we recommend no inclusion until further dialogue between BPA and customers can take place.

J.I. Use of Point-to-Point Service to Serve Network Load

1. Point-to-Point (PTP) service may be used to serve Network Load at an NT POD provided that the Network Customer continues to pay the NT rate for full load service and the PTP contract holder pays the full PTP service costs. The PTP reservation must be a flat transmission capacity MW profile for the full duration of the reservation. Neither the Network Load nor the NT bill will be reduced by the amount of load served with PTP service.
2. The Network Customer may be required to undesignate its DNR pursuant to Section 30.3 of the OATT if the DNR has the same POR as the PTP service and the PTP service is used to serve Network Load for more than one year.

Commented [A26]: This section may be in conflict with BPA's OATT for Network Customer's who have elected to not use Network Service at separate and discrete PODs.

Commented [A27]: The section should be removed. The process of undesignation only applies when a customer is making third party sales from a designated Network Resource.

K.J. Reservation Priority for NT Service Agreements

1. A Network Customer with existing firm transmission service may have the right to continue to take transmission service when its contract expires, rolls over, or is renewed. For detailed information on exercising Reservation Priority rights, please refer to the Reservation Priority Business Practice.
2. For Deposit and Processing Fee procedures and requirements, please refer to the Requesting Transmission Service Business Practice.

L.K. Reservation Priority for Designated Network Resources

1. A Network Customer with existing firm Transmission Service may have the right to renew its DNRs. For detailed information on exercising Reservation Priority rights, please refer to the Reservation Priority Business Practice.
2. The Network Customer must submit a TSR with a Request Type of RENEWAL and a NITS Application on OASIS.
 - a. For detailed information on submitting Renewal requests, see the Requesting Transmission Service Business Practice.
 - b. For Deposit and Processing Fee procedures and requirements, refer to the Requesting Transmission Service Business Practice.

- c. The DNR must be submitted on OASIS no later than 5:00 PM, PPT on the same Business Day in which the LTF NT TSR is QUEUED.
- d. If a NITS Application fails to meet the requirements of the OATT, BPA Transmission Services will notify the Network Customer within 15 calendar days from the day the LTF NT TSR is QUEUED and specify the reasons for such failure.
- e. If, within 10 Business Days of notification, efforts to remedy the deficiencies through informal communications with the Network Customer are unsuccessful, BPA Transmission Services will change the OASIS status of the LTF NT TSR and the NITS Application to DECLINED.

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