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To: [Tech Forum](#)
Cc: [Altman, Brian D \(TFE\)\(BPA\) - TSE-TPP-2](#); [Carol Opatrny](#); [Robert Echenrode](#)
Subject: [EXTERNAL] Business Practice Announcement: Network Integration Transmission Service, V10
Date: Monday, February 15, 2021 11:20:55 AM

Good morning,

On behalf of the Umatilla Electric Cooperative (“UEC”) we are submitting comments related to the Network Integration Transmission Service business practices.

UEC appreciates BPA’s efforts to update the Network Integration Transmission Service (“NT”) business practice, and understands that the major reason for the update is to integrate the annual updates for Network Customer’s ten year load and resource forecasts, the annual NT Dialogue, and the Load and Resource Consolidated Data Collection Tool.

We suggest that the proposed update is not ready for final assembly of comments into Version 10. We recommend that the current version needs more work along the lines of organization, clarity, and less redundancy in the newly drafted sections. It appears that this may be exactly what BPA is contemplating, given that BPA staff indicated at the customer meetings on this topic that is already anticipates some needed updates to the current draft.

We have purposely not proposed drafting edits, however, offer assistance, if solicited.

Below are specific, “substantive” recommendations which we hope BPA considers and incorporates into future drafts of this Business Practice.

1. [Deadlines or a Target Schedule should be included in the Business Practice](#)

Given the complexity and interrelated nature of the elements that make up BPA’s planning processes, we strongly suggest that BPA reflect in this Business Practice deadlines or a target schedule for the work involved. As this time, the Business Practice has no structure in terms of the timing or expected timing of the various efforts that affect the preparation of analyses, evaluations, and materials that are required of NT customers by this Business Practice. Some of these efforts require consultation with retail customers, T&D engineers, and third parties that support analytical and forecasting efforts. By setting deadlines, BPA is aiding its customers to get the necessary work done that BPA seeks.

This is particularly important given the Business Practice imposes deadlines on the NT customers, which introduces complications in terms of prioritizing work schedules, third party deadlines, coordination within the utility including Board of Directors involvement, etc. We suggest that Section B. be modified to include such, or BPA refer to a schedule in Section B., and attach it.

In addition, establishing a target schedule would better communicate to BPA’s customers what constitutes “out-of-cycle” Load and Resource Forecasts (Section C.)

We recognize that schedules can slip, and dates may change, however, BPA has already included language that allows for adjusting the timing of these processes, e.g., B.2.b.

Below are some suggestions in terms of what activities should be identified in a target schedule with associated deadlines for information submittal.

These efforts were included in the materials presented at the June 5, 2020 Network Operating Committee:

- Q1: concluding the 2020 Integrated Load and Resource Forecasting and the NT Dialogue; starting the 2021 Transmission Service Request & Study and Expansion Process (“TSEP”)
- Q2: publishing forecasts; starting the Network Model Updates
- Q3: continuing TSEP; and

Q4: concluding TSEP; starting 2021 Integrated Load and Resource Forecasts and the NT Dialogue; publishing Long-term ATC Updates

In addition, in preparation of the BP24 Rate Proceeding, it would be necessary to include the Rate Period High Water Mark which would need to be reflected in the FY 22 schedule.

2. Deadlines for BPA should be included in the Business Practice

As written the BPA requires customers to:

- Return the Load and Resource Consolidated Data Collection Tool (“LaRC”) in not less than 30 days – should this be Business Days? (B7)
- An incomplete or deficient LaRC must be remedied in 5 Business Days – It would be helpful to know by when BPA will notify the Network Customer of an incomplete or deficient LaRC for a prompt response which should be at least 10 Business Days. (B.10).
- There should be a deadline or target schedule associated with when BPA will publish the Agency Load Forecast; most importantly, by when BPA publishes a final load forecast or “Agency Load Forecast”. (B.11).
- It appears that Section B.13 should be moved, i.e., follow B.10. It seems that a decision by BPA to not accept a portion of the non-federal forecast would be addressed before BPA publishes the final load forecast.
- It would be helpful to know by when BPA will accomplish what is indicated in B. 12 (by when BPA will create FTSRs), and B.14 (by when BPA will send a letter specifying the FTSRs and any attendant details).

3. Section C. Out-of-Cycle Load & Resource Forecast

During the customer meeting on this Business Practice, staff indicated that it may develop a form specific to out-of-cycle Load and Resource Forecasts. We suggest that BPA **not** develop a new form, but instead, simply develop the timeframe and instructions for the customers in terms of how best to notify BPA of change(s), and the implications of such submittals, e.g., impact on queue placement, etc. Developing another form could cause unnecessary duplication of effort, confusion and interpretation issues.

4. Section D. Reserving Transmission Capacity for Forecasted Non-Federal Network Resources

D. 1.a and D.8 suggest that only a CONFIRMED FTSR is used in the calculation of Available Transfer Capability (ATC), not an FTSR which is a Forecasted Long-term Firm NT TSR in OASIS. Please clarify.

D.3 discusses “Alternative Resources” which appears to be helpful flexibility while an NT customer is formalizing arrangements with counter-parties. However, some of the conditions seems overly limiting. For example, if four arrangements are being considered for satisfying a 30 MW FTSR, i.e., 10 MW, 20 MW, another 20 MW, and a 30 MW arrangement, subsection a. limits FTSRs to “the same MW for each year” which would preclude these Alternative Resources. Considering a different example, if four arrangements are being considered for satisfying a 40 MW FTSR, i.e., 10 MW, 20 MW, another 20 MW, and a 30 MW arrangement, subsection c. precludes the selection of the combination of two, 20 MW arrangements, or the combination of the 10 MW and 30 MW arrangements, because the sum exceeds the MW of a single Alternative Resource FTSR. If our interpretations of the drafted language is incorrect, please clarify.

5. Section E. Designation of a New Network Resource

The terms “Designated Network Resource” and “Network Resource” seem to be used interchangeably. If they are not the same, please clarify. If they are they the same, we suggest using only one term, and doing so consistently.

6. Section J. Use of Point-to-Point Service to Serve Network Load

This section appears to be in conflict with BPA's OATT. The OATT seems to allow a Network Customer to designate less than its total "Network Load" (but not designate only a part of the Network Load at a discrete Point of Delivery). Clarification of the Business Practice language would be most helpful as it appears to preclude this election right, and as a result, making NT Customers serving a portion of their Network Load with PTP service, financially responsible for NT service based upon total Network Load and PTP service.

Section 1.23 Network Load:

The load that a Network Customer designates for Network Integration Transmission Service under Part III of the Tariff. The Network Customer's Network Load shall include all load served by the output of any Network Resources designated by the Network Customer. A Network Customer may elect to designate less than its total load as Network Load but may not designate only part of the load at a discrete Point of Delivery. Where a Eligible Customer has elected not to designate a particular load at discrete points of delivery as Network Load, the Eligible Customer is responsible for making separate arrangements under Part II of the Tariff for any Point-To-Point Transmission Service that may be necessary for such non-designated load

7. Clarification

Clarification for the reference to "a study" in, for example B.13 and 14, would be helpful. Said differently, what sort of "study" would potential be performed?

A review of the language to eliminate unnecessary redundancy may be helpful. For example, the same point is made in:

- D.7.a
- E.4.
- F.1.a

(8) Outstanding Questions:

Finally, during the customer meeting on this Business Practice, UEC asked about the status of BPA requiring schedules for NT service for federal resources. Please provide an update on that effort.

Thank you for the opportunity to review and comment. If you have any questions, please reply all to this email.

Sincerely,

Robert Echenrode

Umatilla Electric Cooperative

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