

Conditional Firm Transmission Service

BPA Transmission Business Practice

Version 23

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4/12/19 BPA is able to offer Conditional Firm Service (CFS) on the West of Garrison (WOG) Path. BPA will continue evaluating how and whether to develop CFS on other External Interconnections.

Conditional Firm Transmission Service

Version 23

Conditional Firm Transmission Service is a type of Long-Term Firm transmission service for which there is a specified Number of Hours per year or specified System Condition in which the Transmission Provider can curtail the reservation prior to curtailing other Long-Term Firm service.

OATT Policy Reference

- [Sections 1.46, 13.6, 14.7, 15.4, 19.3, 28.3, 28.7](#)
- [Definitions \(a\), \(c\), \(d\)](#)
- [Attachment O](#)
- [Section 8](#)

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

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A. Background

1. The Federal Energy Regulatory Commission (FERC or Commission) adopted a requirement for Transmission Service Providers to offer CFS (See Order No. 890 and Order 890-A). To review the Commission's discussion and determinations regarding CFS in Order No. 890, see paragraphs 962 to 1094. To review the Commission's discussion and determinations regarding CFS in Order 890-A, see paragraphs 545 to 594.

B. Characteristics of CFS

1. Under the OATT, CFS is treated in the same manner as other Long-Term Firm (LTF PTP) or Network (NT) service except as otherwise specified in the Service Agreement (SA) and this Business Practice.
2. CFS TSRs submitted on OASIS that are not associated with an email notification of CFS eligibility from BPA Transmission Services will be DECLINED.
3. To be considered for CFS, prior to participating in an individual study or Cluster Study, Customers must indicate that they would like to be considered for CFS by entering a comment into the Customer Comments field of the TSR.
4. CFS eligibility requirements that must be met prior to BPA Transmission Services making an offer of full or Partial CFS are:
 - a. The Customer requested either a LTF PTP or NT service and BPA Transmission Services could not offer LTF Service.
 - b. BPA Transmission Services has not made a previous Partial CFS offer to the TSR which was not CONFIRMED.
 - c. BPA Transmission Services will assess each eligible TSR for Subgrid issues to determine if a CFS offer can be made.
 - i. In the event that a Subgrid issue excludes the TSR from receiving service, Conditional Firm Inventory will not be encumbered for that TSR.
 - ii. If a Subgrid issue that excludes the TSR from receiving service is later resolved, the TSR will be reevaluated to determine whether CFS can be offered at that time.
 - d. BPA Transmission Services may use its existing LTF ATC or CF Inventory to make a CFS offer consistent with the processes described in this Business Practice.
 - e. The Point Of Receipt (POR) and Point Of Delivery (POD) for the TSR is at a sufficient level of detail to allow BPA Transmission Services to accurately calculate Power Transfer Distribution Factor (PTDF) impacts to support CFS or if requested, the Customer submits a new linked TSR that meets the POR and POD PTDF accuracy requirements for CFS.
 - f. The CFS reservation will not be used to support transmission of a transaction for which BPA Transmission Services cannot do an accurate PTDF analysis.
 - g. The period between the original TSR's Service Commencement Date (SCD) and the date on which the CFS analysis is performed is no more than three years.

- h. The TSR is not a Forecasted Network Resource. For more information see Section D - Reserving Transmission Capacity for Forecasted Network Resources of the Network Integration (NT) Transmission Service business practice.
5. BPA Transmission Services has assessed its ability to provide CFS without adversely impacting reliability and has posted Conditional Firm Inventory for each network Flowgate (see Conditional Firm Inventory Methodology document). PTDF analysis is used to determine the amount of CF Inventory necessary to offer CFS in the same manner as is done for LTF offers (see Related Business Practices below).
6. BPA will ask the Customer if it wants to receive an offer of CFS and, if it does, whether it wants an offer of: 1) the Number of Hours option, 2) the System Conditions option, or 3) offer of both options. If the Customer wants to receive an offer for both the System Conditions option and the Number of Hours option for further consideration, it will only be able to CONFIRM one of the offers. If the Customer does not respond to the notification within the timeframe specified below, the TSR will receive no further consideration for CFS.
7. The Customer must pay for any necessary studies to determine: 1) whether BPA can offer Conditional Firm Service, 2) the Number of Hours or System Conditions associated with such service, and 3) any Reassessment studies.
8. When BPA Transmission Services makes a CFS offer, it will either be for Bridge Service or Reassessment Service.
9. A resource enabled through CFS qualifies as firm service that supports the designation of Network Resources.
10. Customers with CFS pay the LTF PTP or NT rate regardless of any Conditional Curtailments.
11. CFS may not be used for any transaction that requires a suffix. In the case of CFS TSRs that need to be conformed from Newpoint to a valid scheduling point, BPAT will create the long-term CFS TSR with the valid scheduling point on the Customer's behalf and notify the Customer of this action and new TSR number.

C. CFS Offer

1. TSRs will be considered for CFS offers in queue order if BPA Transmission Services cannot make LTF offers.
2. If BPA Transmission Services has determined it is able to make an offer of CFS on a TSR:
 - a. BPA will notify the Customer by email.
 - b. Within 10 business days of the notification the customer must indicate if it wants to receive a Number of Hours or System Conditions CFS offer by:
 - i. Submitting a Pre-confirmed Conformance CFS TSR that matches the instructions provided by BPA Transmission Services with the comment "associated with CFS" in the customer comments field of the TSR.
 - ii. Customer must also specify in the customer comments field of the TSR which option of CFS has been chosen.

- c. If the customer fails to respond within the specified timeframe by failing to submit the conformance CFS TSR, the Parent TSR will receive no further consideration for CFS.
- 3. Once the Customer has submitted its conformance CFS TSR, if required, BPA Transmission Services will offer the Customer a Service Agreement (SA) Table for signature.
 - a. The Customer must sign and return the SA within 15 calendar days of the Date of Tender.
 - b. If the Customer returns the SA within the specified timeframe, BPA Transmission Services will change the status of the TSR to ACCEPTED/CONFIRMED.
 - c. If the Customer fails to return the SA within the specified timeframe, BPA Transmission Services will change the status of the CFS TSR to DECLINED and the Parent TSR will receive no further consideration for CFS.
- 4. If the Customer chooses the System Conditions offer, the Service Commencement Date shall be the first day of the month after the process used to curtail transmission has been modified to incorporate the conditions associated with the offer.
- 5. For each CONFIRMED CFS TSR, BPA Transmission Services will decrement LTF ATC and CF Inventory needed in the following manner:
 - a. For all Flowgates for which LTF ATC is available, LTF ATC will be decremented.
 - b. For all Flowgates for which LTF ATC is not available, CFS Inventory will be decremented.

D. POR & POD Modification

- 1. If BPA Transmission Services determines that the POR or POD in the Transmission Service Request is insufficient for adequate Conditional Curtailment due to inability to accurately calculate PTDF impacts, BPA Transmission Services will provide the Customer with written notice.
- 2. BPA Transmission Services will work with the Customer to develop a mutually agreeable POR or POD for CFS.
 - a. If the Customer wants to receive an offer of CFS, the Customer will need to submit a new TSR using the mutually agreeable POR or POD. The TSR must specify the AREF number of the original request in the Deal Ref field.
 - b. If BPA Transmission Services and the Customer are unable to reach agreement on a new POR or POD, or if the Customer fails to submit the new TSR within 30 calendar days of written notice, BPA Transmission Services will deem the TSR ineligible for CFS. The TSR will receive no further consideration for CFS.
- 3. Source/POR combinations that are ineligible for CFS include but are not limited to:

ALBENIFLS115/BPAPOWER	ICEHARBOR115/BPAPOWER
BIGEDDYCNTGS/BIGEDDY	JOHNDAY500/BPAPOWER
BONNEVILLE115/BPAPOWER	JOHNDAYINTI500/JOHNDAY
BONNVLEPHCNTGS/BPAPOWER	LIBBY230/BPAPOWER
CHIEFJOECNTGS/BPAPOWER	LITTLEGOOSE500/BPAPOWER
COLUMBIAGEN500/BPAPOWER	LOWERGRNT500/ BPAPOWER

COLUMBIAGENST/BPAPOWER	LWRMONUMNTL500/BPAPOWER
COVNGTN230PSEI/BPAT.PSEI	MCNARY230BPAP/BPAPOWER
DGLSSWY230MIDC/MIDCREMOTE	MCNARYCNTGS/BPAPOWER
DWORSHAK500/BPAPOWER	MIDWAY230MIDCR/MIDCREMOTE
DWORSHAKCNTGS/BPAPOWER	NWMRKTHUB/NWH
FCRPS/BPAPOWER	RKYRCH230MIDC/MIDCREMOTE
GRNDCULEE500/BPAPOWER	SICKLER230MIDC/MIDCREMOTE
GRNDCULEECNTGS/BPAPOWER	THEDALSCNTGS/BPAPOWER
HARNEY115/HARNEY	VALHALA115MIDC/MIDCREMOTE
HUNGRYHORSE230/BPAPOWER	VANTAGE230MIDC/MIDCREMOTE

E. E-Tagging Requirements for CFS

1. When e-Tagging LTF-CF6 PTP or NT on the BPA Network as a result of receiving a Number of Hours Conditional Firm reservation, the e-Tag must contain:
 - a. The AREF number
 - b. A suffix of “-CF”
 - c. A NERC priority code of 6-CF or 6-NN
2. When e-Tagging a LTF-CF7 PTP or NT on the BPA Network, as a result of receiving priority rights to Short-term Firm (see Section F below), the e-Tag must contain:
 - a. Either the AREF number or the contract number
 - b. No use of suffix
 - c. A NERC priority code of 7-F when tagging LTF-CF7 for PTP
 - d. A NERC priority code of 7-FN when tagging LTF-CF7 for NT Service.
3. When e-Tagging a LTF-CF6 PTP or NT on the BPA Network as a result of receiving a System Conditions Conditional Firm reservation, the e-Tag must contain:
 - a. The AREF number
 - b. A NERC priority code of 7-F for LTF-CF6 PTP
 - c. A NERC priority code of LTF-7-FN when tagging for LTF-CF6 NT
4. When e-Tagging a Conditional Firm (Number of Hours or System Conditions) PTP or NT reservation on an External Interconnection, the e-Tag must contain:
 - a. The AREF number
 - b. No use of suffix
 - c. A NERC priority code of 7-F when tagging CF for PTP
 - d. A NERC priority code of 7-FN when tagging CF for NT Service

F. Priority Rights to Short-Term Firm (STF)

1. CFS reservations have priority rights to STF ATC. If the Transmission Customer has a CFS reservation which has Subgrid issues, that reservation will not be eligible for STF ATC.
2. BPA Transmission Services will assess the availability of STF ATC on a monthly basis for service in future months.
3. All of the Flowgates that used CF Inventory must have STF ATC available for the month for the reservation to be Firmed Up. If that is not the case, the STF ATC will be assessed for use by the next CFS reservation in queue order. If there is insufficient STF ATC to Firm Up all of a CFS reservation, a portion of that reservation will be Firmed Up.
4. If there is not enough STF ATC at one or more Flowgates to allow all of the CFS reservations to be Firmed Up for the month, STF ATC will be allocated in queue order.
5. If STF ATC is available to Firm Up a LTF CF-6 PTP or NT reservation for the month, BPA Transmission Services will create a new CF reservation with a firm NERC Curtailment priority and will recall the capacity from the CFS reservation with a NERC Curtailment priority of 6-NN for that month. BPA Transmission Services will set the status of the new reservation to CONFIRMED.
6. If a CFS reservation will not receive STF for a month, there will be no change of CFS reservation.
7. For a CFS TSR to be eligible to be Firmed Up with STF ATC, no e-Tags can be in place for the month being Firmed Up. If the LTF CF-6 PTP or NT reservation has any reductions (such as those due to e-Tags, Redirects, Recalls, or Resales) against it, it will not be Firmed Up.
8. BPA Transmission Services will not Firm Up CFS reservations based on weekly, daily, or hourly capacity or changes to monthly capacity after the Firm Up process.
9. BPA Transmission Services will not displace a STF reservation to enable a CFS reservation to be Firmed Up.
10. BPA Transmission Services will not compete the Firmed Up portions of CFS in the STF market.
11. For reservations undergoing a Reassessment, STF capacity will be encumbered, but the reservation will not be Firmed Up except upon determination that capacity is available at Reassessment and after the Customer signs the new Reassessment Table. If the Customer does not sign the new Reassessment Table, the STF will be released to the market.
12. For reservations with a Service Commencement Date (SCD) more than 60 calendar days in the future, BPA Transmission Services will encumber STF capacity to Firm Up the CF reservation on a fourth month out basis (if available). BPA Transmission Services will only create the Firm Up TSR once the SCD is less than 60 calendar days in the future and if the Customer does not obtain an Extension for Commencement of Service under Section 17.7 of the OATT and the Deferral Service Business Practice. If the Customer obtains an Extension for Commencement of Service, BPA Transmission Services will release the STF Capacity to the market at the time that the Deferral CF TSR is CONFIRMED.

G. CFS Curtailment

1. General Characteristics of CFS Curtailments:
 - a. Under CFS, Conditional Curtailment may occur any time a reliability event is occurring, or is anticipated to occur, and that mitigation involving a CFS Curtailment can help to relieve. Such Curtailments will be done in NERC Curtailment priority order.
 - b. When Conditional Curtailment occurs, the Customer must reduce the generator or the load associated with Conditional Firm by the amount of the Conditional Curtailment for the period of the Conditional Curtailment.
 - i. If the source of the CFS TSR is in another Balancing Authority Area (BAA) and that BAA only has one point of interconnection with Bonneville's BAA, unless otherwise provided on the e-tag, then any generator can be reduced in that BAA to satisfy the section 1.c. requirement above since they all have the same PTFDF impact.
2. Additional Curtailment characteristics of CFS that has not been Firmed Up:
 - a. Specific to Interties and External Interconnection Curtailments (unless an Intertie or External Path is specifically noted in the contract table associated with the CFS reservation)
 - i. Curtailments to CFS that occur as a result of Intertie or External Interconnection Curtailments do not constitute use of Conditional Curtailment Rights.
 - ii. CFS will be treated as NERC Priority 7 if Curtailment of an intertie or external interconnection is required for a future hour.
 - iii. CFS will be treated as NERC Priority 6 if Curtailment of an intertie or external interconnection is required in hour.
 - b. For any individual hour, one hour of Conditional Curtailment rights will be counted for a specific Number of Hours CFS reservation if all of the following criteria are met:
 - i. The CFS reservation was used on an e-Tag where all or part of that hour was curtailed,
 - ii. The Curtailment occurred on one or more network segments of the curtailed e-Tag, and
 - iii. If the e-Tag used one network segment using Non-Firm service and another segment using CFS, another e-Tag using only Priority 6 and/or 7 services was also curtailed in that hour for one or more of the same network Flowgates requiring relief.
 - c. Curtailments of an e-Tag with two or more CFS segments performed as above constitutes one hour of Conditional Curtailment use for each CFS reservation.
 - d. Curtailments of wind generation as a result of Operational Controls for Balancing Reserves do not count towards the Number of Hours.
3. Additional Characteristics of CFS that has been Firmed Up:

- a. When a CFS had been Firmed Up the e-Tag must have a firm NERC priority code for that segment of transmission and is curtailed or redispatched according to NERC Priority of the impacted segments.
 - b. Curtailments to Firmed Up CFS do not constitute any hours of use of Conditional Curtailment rights.
4. The following apply to Curtailment of CFS that has not been Firmed Up:
- a. The e-Tag must have a NERC priority code of 6-CF or 6-NN and in-hour Curtailments occur the same basis as all other 6-CF or 6-NN transmission.
 - b. When a Conditional Curtailment occurs, no alternate e-Tags are allowed for the portion of the generator(s) that were curtailed.
 - c. For Number of Hours CFS, BPA Transmission Services will track the number of CFS hours curtailed for the year under each CFS reservation and provide documentation to the Customer upon request.
 - d. For Number of Hours CFS, when Curtailments are made at the NERC priority level 6, valid Conditional Curtailments which are properly implemented for the associated CFS flowgate or External Interconnection are counted against the number of Conditional Curtailment hours (including if Transmission Service made such Curtailment in error but failed to reload the e-Tags).
 - e. For Number of Hours CFS, when the number of Conditional Curtailment hours used in the calendar year meets or exceeds the number of specified hours in the CFS Table, the CFS will be Firmed Up for the remainder of the calendar year on the next Business Day for the period starting the following Business Day. Note: The Customer will need to withdraw or adjust any e-Tags that are using the referenced capacity for that period to allow the Firm Up process to take place.
 - f. For Number of Hours CFS, if the priority of service for the CFS becomes firm due to using all the Conditional Curtailment hours defined for the reservation, BPA Transmission Services will create a new firm reservation for the remainder of the calendar year.
5. Additional CFS Hours Counting Rules
- a. For any individual hour, only one hour of use of Conditional Curtailment rights will be counted for a specific CFS reservation, regardless of the number of Curtailments performed within that hour or number of e-Tags curtailed as described above.
 - b. In the event that one or more segments in the e-Tag are vertically stacked, BPA Transmission Services will determine whether or not an hour of Curtailment constitutes one hour of use of Conditional Curtailment rights depending on the extent of the Curtailment and how the e-Tag was stacked.
 - c. When BPA Transmission Services Dispatchers request a generator associated with a CFS reservation to decrement due to local area reliability problems, that decrement will not count towards the Number of Hours.

H. Testing of Curtailment Capability

1. There are two kinds of Curtailment tests - scripted and unscripted:

- a. Scripted test - BPA Transmission Services will work with the reservation holder to determine the day and hour of the test and provide advance notice of the amount of the Curtailment. Scripted tests will be done upon request by the Customer and mutual agreement with BPA Transmission Services to assist the Customer in preparation for the unscripted Curtailment test. Only two one-hour scripted tests each year will count towards the Number of Hours.
 - b. Unscripted test - an unannounced test Curtailment.
 - c. BPA Transmission Services will provide the results of each unscripted and scripted test in writing to the Customer within five Business Days after the unscripted test.
2. Shortly after commencement of a CFS reservation, BPA Transmission Services and the Customer will mutually agree to a fourteen calendar day period where an unscripted test will occur. If BPA Transmission Services and the Customer cannot mutually agree to a fourteen calendar day period where an unscripted test will occur, then BPA Transmission Services will select the fourteen calendar day period where an unscripted test will occur after taking into account Customer's needs.
 - a. If, upon occurrence of the unscripted test, generation reduction occurs as ordered, no further testing of Curtailment capability will occur due to the new CFS reservation. BPA Transmission Services may only perform additional unscripted tests as described in step 3 below.
 - b. Each unscripted test Curtailment counts as the use of one hour towards the Number of Hours.
 - c. An unscripted test will count as one of the test hours specified in the contract.
3. BPA Transmission services may also do unscripted tests in response to:
 - a. Failure to fully comply with an e-Tag Curtailment (including a test Curtailment)
 - b. Any indication that the reservation holder is or will have difficulty complying with a Curtailment directive for the CFS transmission
4. Test Curtailments, whether scripted or unscripted, will be:
 - a. Limited to a reasonable amount of MWs necessary to determine that the generator complied with the Curtailment order
 - b. Implemented late in the hour or will be reloaded to minimize the amount of energy Curtailed

I. Bridge CFS

1. To be eligible for Bridge CFS, the Customer must commit to participate in the necessary system upgrade(s) that will enable LTF service.
2. Bridge CFS will convert to LTF Service if the facilities identified in the Service Agreement or their equivalents are completed or if LTF Service otherwise becomes available.
3. Conversion to Long-Term Firm Transmission Service does not change the Service Termination Date. The new LTF reservation will have the same Service Termination Date as the CFS reservation that it replaces.

4. If the Customer has Bridge CFS and BPA Transmission Services notifies the Customer that the necessary system upgrade(s) will not proceed at the Embedded Cost Rate, the Customer has the following options:
 - a. Accept service at the Incremental Cost Rate and make the associated commitments required. If the Customer accepts service at the Incremental Cost Rate, but does not meet a required commitment, Bridge CFS will terminate. The Customer will be eligible to obtain Reassessment Service as described in the CFS contract.
 - b. Execute an offer of Reassessment Service. BPA Transmission Services will make this offer based on the CF Inventory, if any is needed, and the Number of Hours or System Conditions associated with it at the time of the offer.

J. Reassessment CFS

1. Reassessment only applies to a CFS reservation which is not based on Bridge CFS. For Reassessment CFS, the reservation is to transition to Bridge CF under the criteria set forth below.
 - a. To transition to Bridge CFS from Reassessment CFS, the Reassessment CFS Customer must submit a new request.
 - i. The new request may be submitted at any time.
 - ii. The queue time of the new request is when the customer submits it.
 - iii. The Deal Ref of the new request must reference the Reassessment CFS TSR.
 - iv. The Customer must enter the comment, "CFI TSR for TSR (Reassessment CFS TSR A-ref number)" into the customer field of the new request.
 - b. The POR and POD of the new request must be identical to the POR and POD of the Reassessment CFS reservation.
 - c. The source and sink of the new request must be identical to the source and sink of the Reassessment CFS reservation.
 - d. The term of the new request must be identical to the term of the Reassessment CFS reservation.
 - e. The capacity of the new request must be equal to the capacity of the Reassessment CFS. If additional capacity is needed, this would be done as a separate request and not be part of this CF conversion.
 - f. If BPA is able to offer Long Term Firm service on any or all of the new request, the corresponding Reassessment TSR will be Recalled down for the demand and time period of an executed offer.
 - g. If the Customer participates in a subsequent System Impact or Cluster Study and a build goes forward that will enable BPAT to provide Long Term Firm Service at embedded rates, BPA will update the contract related to the existing Reassessment CF reservation and its associated rollover rights, if any, to reflect Bridge CF service. If no changes are needed to the existing CF reservation, no OASIS actions are required.

- i. The new request will be for the same type of CFS (Number of Hours or System Conditions) as the Reassessment CFS reservation.
 - ii. The Number of Hours of curtailment associated with Bridge CFS reservation shall be the Number of Hours normally associated with other Bridge CFS offers made at the time.
 - iii. The System Condition(s) will be the System Condition(s) in the Reassessment CFS reservation.
 - h. If the Customer participates in a subsequent System Impact or Cluster Study and a build does not go forward that will enable BPAT to provide Long Term Firm Service at embedded rates, the Customer may:
 - i. Continue to take Reassessment CFS; or
 - ii. Accept service at the Incremental Cost Rate and make the associated commitments required. In this case, the demand under the Reassessment CFS reservation table will be reduced to zero and the Customer will be given a new Bridge CFS reservation table. The Number of Hours of curtailment associated with Bridge Service CF reservation shall be the Number of Hours normally associated with other Bridge CFS offers made at the time.
 - iii. BPAT will not perform a Reassessment of the Customer's Conditional Curtailment hours during the TSEP if the Customer has signed a PTSA associated with the new request.
2. BPA Transmission Services may perform a Reassessment of the Customer's Number of Hours or System Conditions no more often than once every two years. The first Reassessment can occur no earlier than two years after the Service Commencement Date of the Table.
 - a. Reassessment is not limited to the Number of Hours or System Conditions listed in the CFS Table for the reservation. Reassessment may include reevaluating all constraints and conditions, associated with all Flowgates, Interties, and External Interconnections impacted by the reservation.
3. If BPA Transmission Services chooses not to reassess the Customer Number of Hours or System Conditions by the two year anniversary of the last Reassessment, BPA Transmission Services maintains an ongoing right to perform a Reassessment. The criteria for performing Reassessments will be consistent for all similarly situated CFS reservations.
4. Reassessment results must be provided to the Customer at least 90 calendar days prior to the date on which the new Number of Hours or System Conditions CFS would go into effect. Such notice will include the offer of a new Table. The Customer shall pay all Reassessment study costs:
 - a. If the Number of Hours necessary to continue the CFS has increased or there is a change in the System Conditions:
 - i. The Customer has the option to discontinue the CFS or to execute a new Table with the increased number of CFS hours or changed System Conditions. Note: It is the Customer's responsibility to ensure that any such e-Tags are withdrawn so that they do not incur an Unauthorized Increase Charge.

- ii. If the Customer chooses to discontinue the CFS, any CF Inventory is then available to be offered to the next eligible TSR(s).
 - b. If there is no change in the Number of Hours, the Number of Hours decreases or there is no change in the System Conditions, the Customer must continue taking CFS through the term of the reservation.
5. Reassessment and exercise of Reservation Priority (OATT 2.2) are separate processes.
 - a. If Reassessment is done shortly after rollover, the Customer's right to discontinue CFS, if the Number of Hours is increased, is not impacted by the recent rollover. The Customer retains their right to terminate the contract.
 6. BPA Transmission Services will post the results of its evaluation of the Number of Hours needed for each Flowgate or changes in System Conditions within 30 Business Days of completion regardless of whether the data indicates a need to modify the Number of Hours.

K. Deferral & Reservation Priority for CFS

1. A CFS PTP reservation has the same Deferral rights (OATT 17.7) as other Firm PTP reservations. In the event that a CFS PTP reservation converts to a Long-Term Firm PTP reservation or a Reassessment CFS PTP reservation converts to a Bridge CFS Reservation, the number of deferrals taken while the reservation was for CFS PTP service (both Reassessment and Bridge) are combined with the number of deferrals taken for the Long-Term Firm PTP reservation to determine the total number of deferrals under Section 17.7. Under Section 17.7, the total number of deferrals may not exceed five. For example, a CFS PTP reservation that has been deferred three times before it becomes a Long-Term Firm PTP reservation can only be deferred two more times.
2. A CFS PTP or NT TSR has the same TSR Reservation Priority rights (OATT 2.2) as other PTP or NT reservations except as specified herein. The relevant business practices apply to CFS as they do to other reservations.
3. If CFS converts to LTF Transmission Service, the term of Bridge Service or if Reassessment CFS converts to Bridge CFS, the term of the CFS (Both Reassessment and Bridge) counts towards the five year requirement for renewal rights under OATT Section 2.2. For example, if a Reassessment CFS reservation was for a period of five years, but service converts to Bridge CFS at the end of the third year and then converts to LTF at the end of the fourth year, the new LTF reservation has the same renewal rights as the original Reassessment CFS reservation even though it has duration of one year.
4. Because CFS cannot be requested on OASIS, please contact the BPA Transmission Services' Reservation Desk during Core Business Hours to submit a Deferral or Renewal CFS TSR.

L. Redirects, Resales & Transfers of CFS

1. BPA Transmission Services' business practices for redirect, resale or transfer requests apply to CFS as they do to non-CFS unless otherwise specified.
 - a. Transfers of CFS are allowed per the OASIS Transfer of Transmission Service business practice. All requirements of CFS apply to the Transfer reservation.

- b. Resales of CFS are allowed consistent with the Resale of Transmission Service Business Practice.
 - c. Redirects of CFS are allowed consistent with ATC and the Redirects Business Practice.
2. A LTF CF reservation may only be submitted during the Reservation Desk normal business hours of Monday through Friday, from 08:00 PPT to 16:00 PPT.

M. Conditional Firm Service Agreement

1. [Conditional Firm Service Agreement](#)

N. Interties and External Interconnections

1. At this time, BPA is unable to provide CFS to TSRs that would be conditional on both interties or External Interconnections and the BPA network.