

March 7, 2018

Via Tech Forum Email (techforum@bpa.gov)

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

Re: Queue Management/Rollover Comments of Avangrid Renewables, LLC and Puget Sound Energy, Inc.

Avangrid Renewables, LLC and Puget Sound Energy, Inc. (“Commenting Parties”) respectfully submit the following comments on the queue management/rollover proposals presented by Bonneville Power Administration (“BPA”) at the Pro Forma Gap Analysis/Tariff customer meeting of February 21, 2018, and the queue management/rollover presentation posted for such meeting.¹ Commenting Parties appreciate the opportunity to submit comments to BPA and look forward to working with BPA on the queue management/rollover issues identified by BPA.

The Queue Management/Rollover Presentation recognizes that BPA’s current practice of use of a Transmission Service Request (“TSR”) duration to determine whether the TSR is eligible for rollover right does not comply with Section 2.2 of either BPA’s or the pro forma Open Access Transmission Tariff (“OATT”), each of which requires a service (or contract) term of at least five years to be eligible for rollover. The Queue Management/Rollover Presentation explains that BPA is seeking to close the gap between BPA’s existing practices and section 2.2 of the BPA and pro forma OATT. The Queue Management/Rollover Presentation suggests two options that BPA is considering:

- (i) an option that adheres to Section 2.2 of the pro forma OATT (“Pro Forma Option” or “Option A”) or
- (ii) an option that specifies rules for rollover rights for TSRs based on study participation by a customer (“Option B”).

Under the Pro Forma Option, BPA would limit rollover rights to transmission service with a duration of five years or more. (Rollover consideration would be removed from TSRs in the queue once an offer of at least five years was no longer possible.) BPA states that the Pro Forma Option would be consistent with BPA’s existing OATT as well as the pro forma OATT and therefore, BPA would need to modify its current practices but not its OATT if BPA were to implement the Pro Forma Option.

¹ *Queue Management/Rollover*, dated February 21, 2018, available at <https://www.bpa.gov/transmission/CustomerInvolvement/TransmissionBusinessModel/Documents/Queue-Mgmt-Rollover-PFGA-022118.pdf> (the “Queue Management/Rollover Presentation”).

Under Option B, BPA would have different rollover right rules for TSRs, depending on whether the TSRs are participating in a study/build/upgrade process. If a TSR were not participating in a study/build/upgrade process, then such TSR would be awarded rollover rights under the same rules as the Pro Forma Option (i.e., rollover rights would only apply to transmission service with a duration of five years or longer). If a TSR were participating in a study/build/upgrade process, then the customer would have an option to maintain the requested service duration, which, if five years or longer, would result in rollover rights, provided that customer conforms the TSR.

Commenting Parties are generally supportive of Option B, which Commenting Parties believe has the potential to be superior to the Pro Forma Option. Whereas the Pro Forma Option limits all TSR rollover rights to TSRs with transmission service with a duration of five years or longer, Option B provides greater flexibility by allowing those TSRs that participate in a study/build/upgrade process to remain eligible for rollover rights, provided that the TSRs are conformed (to transmission service with a duration of five years or longer). Notwithstanding such general support, Commenting Parties submit the following questions and comments.

1. BPA Should Commit to Offer Conditional Firm Service, if Available, to TSRs Participating in a Study/Build/Upgrade Process During the Pendency of Such Process--But Should Not Require the Purchase of Conditional Firm as a Condition to Participation in Such Process

Option B provides potential eligibility for rollover rights as an incentive for TSRs that participate in a study/build/upgrade process. Customers with TSRs may have an immediate or short-term transmission need, and BPA should commit to offer conditional firm service, if available, to customers with TSRs participating in a study/build/upgrade process during the pendency of such process.

However, conditional firm may not be practicable for some customers that need “unconditional” firm. Therefore, BPA should not require the purchase of conditional firm as a condition to a customer’s participation in a study/build/upgrade process.

2. BPA Should Confirm that Any Restrictions on Rollover on Transmission Redirects Through the End of a Parent Contract Will be Clearly Communicated to the Transmission Customer at the Time of the Grant of the Transmission Redirect

At the Pro Forma Gap Analysis/Tariff customer meeting of February 21, 2018, BPA confirmed that customers with transmission service of a duration of five years or longer (the “Parent Contract”) that redirect transmission to the end of the term of the Parent Contract will qualify for rollover on either the Parent Contract or the redirect path. Transmission customers can expect rollover rights on transmission service of a duration of five years or longer unless BPA clearly identifies a restriction on rollover rights in the transmission contract. Similarly, transmission customers should be able to expect rollover rights on transmission redirect paths that run through the end of the term of transmission service with a duration of five years or longer unless BPA clearly identifies a restriction on rollover rights in the transmission redirect grant. Therefore, BPA should confirm that any restrictions on rollover on transmission redirects

through the end of a Parent Contract will be clearly communicated to the transmission customer at the time of the grant of the transmission redirect.

* * *

Commenting Parties appreciate 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.