

August 23, 2019

**Via email:**

[techforum@bpa.gov](mailto:techforum@bpa.gov)

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

**Re: Comments of Puget Sound Energy, Inc. Regarding Hourly Firm Update:  
Start of Customer Comment Window**

Puget Sound Energy, Inc (“PSE”) respectfully submits the following comments regarding BPA “*De Minimis* Impact Dead-Band for Network Flowgates Version 15” document<sup>1</sup> (“*De Minimis* Document”).

Below is a screenshot of the tests that are described in this *De Minimis* Document:

2.1 Tests to Determine *De Minimis* impacts

Two tests (see Table 1) will be applied to each Transmission Service Request (TSR). If the TSR passes either test, then the TSR will be deemed to have a *de minimis* impact on that Network Flowgate.

2.1.1 (Test 1) The positive net impact on the Flowgate is less than or equal to 10 MW and less than or equal to 10 percent of the requested demand. Analysis is based on four decimal places.

2.1.2 (Test 2) The positive net impact on the Flowgate is less than or equal to 10 MW and the original flowgate impact divided by the new flowgate impact is greater than or equal to 80 percent.

Definitions	A = 0 MW or positive Flowgate MW impact of new request B = 0 MW or positive Flowgate MW impact of original reservation, if any. (A - B) = Net Flowgate MW impact PUF <sub>A</sub> = Flowgate PUF associated with POR/POD of new request
Test 1	(A - B) ≤ 10 MW AND PUF <sub>A</sub> ≤ 0.1000
Test 2	(A - B) ≤ 10 MW AND (B ÷ A) ≥ 0.8000, for non-zero A values

The general concept of BPA’s *De Minimis* test is to allow certain “*de minimis*” increases in flows resulting from a TSR on constrained network flowgates. It appears that BPA applies the *De Minimis* test in analyzing TSRs for new service (Long-Term and Short-Term) and for TSRs

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<sup>1</sup> located at [https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Documents/deminimis\\_impact\\_dead\\_band.pdf](https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Documents/deminimis_impact_dead_band.pdf)

for long term redirects. However, it appears that BPA fails to adhere to this *De Minimis* test when it is analyzing TSRs for Short Term Redirects.

Specifically, it appears that BPA in analyzing TSRs for Short Term Redirects fails to apply Test 2. Consistent with BPA's *De Minimis* Document, BPA should apply both the Test 1 and Test 2 and if either test is passed, the TSR must pass. Consistent application of BPA's *De Minimis* Document would promote equitable treatment among various types TSRs submitted to BPA.

It appears that there are a sufficient number of customers having unexpected detrimental impacts related to the application of the *De Minimis* Document to warrant BPAT prioritizing the issue and creating a plan to conduct customer workshops as soon as reasonably practicable.

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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. PSE 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.