

# **Response to Comments – Preemption of Short-Term Transmission Service**

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## **BPA Transmission Business Practice**

Version 5

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# Response to Comments – Preemption of Short-Term Transmission Service

## Version 5

This document contains comments and BPA’s response regarding the Preemption of Short-Term Transmission Service, Version 5 posted for comment from August 4 to September 9, 2022.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

## Table of Contents

A. Portland General Electric.....	1
B. Business Practice Modifications .....	1

### A. Portland General Electric

During the last BP conference call on Version 5 of the Preemption of Short-Term Transmission Service BP, Bonneville explained that 1-NS is not part of preemption/competition, but I cannot find that stated anywhere in the BP. Is this something that can be clarified in the BP so it is more apparent?

#### BPA Response

Footnote 5 has been added to Table C clarifying that Non-Firm Secondary Hourly PTP service (1-NS) is not part of the Preemption process as either a Challenger or a Defender.

### B. Business Practice Modifications

Per Section 4.5.4, Bonneville’s Response to Comments and Decision, (c) of the Bonneville Business Practice Process, BPA has made the following modifications and clarifications.

#### 1) Section D Preemption Timing Requirements, Table B

Modify both the Challenger Timeframe (“Must be Queued By”) and Defender Timeframe for the row Hourly Firm PTP from ‘1:00 PM of the Preschedule Day’ to ‘11:00 AM of the Preschedule Day’. This is to align with the TC-24 Settlement change to the conditional reservation deadline for Hourly Firm service to noon of the WECC Preschedule Day. The noon conditional reservation deadline translates into a PCM timing of 11:00 AM for PTP Challengers.

#### 2) Section D Preemption Timing Requirements, Table B

Modify both the Challenger Timeframe (“Must be Queued By”) and Defender Timeframe for the row Hourly Firm NT from ‘1:30 PM of the Preschedule Day’ to ‘11:30 AM of the

Preschedule Day' in alignment with the TC-24 Settlement. The noon conditional reservation deadline translates into a PCM timing of 11:30 AM for NT Challengers.

**3) Section D Preemption Timing Requirements, Table C**

Modify both the Challenger Timeframe ("Must be Queued By") and Defender Timeframe for the row Hourly Non-Firm PTP from '95 Minutes Prior to Start' to '100 Minutes Prior to Start'. This change is being made in alignment with recently approved NAESB standards to provide more reasonable timeframes for the overall Preemption and ROFR process for Hourly Non-firm (2-NH) service.

**4) Section D Preemption Timing Requirements, Table C**

Add footnote 5 to clarify that Non-Firm Secondary Hourly PTP service (1-NS) is not subject to the Preemption process as either a Challenger or a Defender. 1-NS is excluded as a Challenger per NAESB standards. 1-NS is excluded as a Defender due to the BPA's ATC methodology (which respects reservation priority).