

Comments from the Bonneville Power Administration, Power Business Line (BPA PBL) to the NAESB Recommendation R03013 (Coordinate Interchange Business Practices) are attached.

The BPA PBL appreciates the opportunity to comment on the NAESB CIBPS. Comments on the following items are italicized, underlined and in red within the original documents.

RFI Standard 1.0
RFI Standard 1.1
RFI Standard 1.12
RFI Standard 9.1
RFI Standard 9.2 (Added)
RFI Standard 12.0
RFI Standard 13.0
RFI Standard 14.0

RFI Submission and Response Timetable subsection B. Western
Interconnection - New Transactions RFI Submission and Response
Timetable subsection D. Interchange Transactions Modifications

RFI Datasheet 1.1.1.2.
RFI Datasheet 1.1.1.4. (Added)

NAESB RFI Datasheet (Request For Interchange) Required and Correctable Data

Version 1

- A. New Requests For Interchange
 - B. Market Related Profile Modifications (Market Adjustment)
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A. New Requests For Interchange

A **new RFI** is an RFI that has not yet been implemented or confirmed for implementation. Such RFI must be presented to those entities that are responsible for the implementation of the RFI in order that they may **evaluate** the Request and determine whether or not it can be implemented. The following information is to be used to describe such a RFI.

1. Market Information

- 1.1. **Financial Path (Required)** – the description of financially responsible parties for the transaction in order. This will typically start with a GPE and finish with a LSE, with optionally Intermediate PSE's between the two.
 - 1.1.1. **Energy Title Holder(s) (Required)** – the identity of the entities financially responsible to take and/or deliver the energy as described in the physical path. This will typically start with a GPE and finish with a LSE, with optionally Intermediate PSE's between the two.
 - 1.1.1.1. Energy Product Type (Correctable) – the type of energy delivered by the Energy Title Holder.
 - 1.1.1.2. Contract Number(s) **(REQUIRED) (Correctable)** – reference to a TRANSACTION entered into by the Energy Title Holder with one or more other participants in the RFI. **The BPA PBL Would like to see generation contract numbers required for matching tags to specific financial agreements**
 - 1.1.1.3. Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.
 - 1.1.1.4. **The BPA PBL would like to add the following as required information:**
Contact Information (REQUIRED) – 24-hour contact and/or preschedule/realtime information for all entities involved in a physical path (GPE, LSE, PSE, TSP, RA's and BA's)

2. Physical Information

- 2.1. **Physical Path (Required)** – the description of physically scheduling parties for the transaction in order and related to the financially responsible parties described above. This will always contain a Generation segment, at least one Transmission segment, and a LOAD segment.
 - 2.1.1. **Generation (Required)** – set of data describing the physical and contractual characteristics of the energy source.

- 2.1.1.1. **Resource Service Point (Required)** – the physical point at which the energy is being generated. This may vary in granularity, dependent on local business practices.
- 2.1.1.2. **Contract Number(s) (Correctable)** – reference to a schedule or agreement entered into by the Generation Providing Entity and the Generator Operator.
- 2.1.1.3. **Miscellaneous Information (Correctable)** – information provided at the author's option regarding the RFI.
- 2.1.1.4. **Energy Profile (Required)** – energy to be produced by the generator for this RAI.
- 2.1.2. **Transmission (Required)** – set of data describing the physical and contractual characteristics of a wheel (import, export, or through).
 - 2.1.2.1 **Transmission Provider (Required)** – the identity of the transmission provider that is wheeling the energy.
 - Point of Receipt -POR (Correctable) – valid Point of Resource for scheduled Transmission Reservation.
 - Point of Delivery - POD (Correctable) – valid Point of Delivery for scheduled Transmission Reservation.
 - Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.
 - Scheduling Entity(ies) (Correctable) – entities that are physically scheduling interchange on behalf of the TRANSMISSION PROVIDER in order to provide wheeling services.
 - **Loss Provision Information (Required)** (Correctable)– Information describing the manner in which losses are accounted for. Losses will either be paid back In-Kind or Financially.
 - Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.
 - **POR and POD Profiles (Required)** – schedule of Energy Flow imported at the Point of Receipt and Exported at the Point of Delivery.
 - **Transmission Reservation Number(s) (Required)** (Correctable) – reference to a particular transmission reservation being used to provide transmission capacity to support the transaction being described.
 - o **Transmission Product (Required)** (Correctable) – Specifies the NERC Priority.
 - o **Transmission Customer (Required)** (Correctable) – identifies the entity that purchased and holds the transmission reservation being presented for use.
 - o **Transmission Reservation Profile (Required)** - information describing the transmission reservation commitment associated with the TRANSMISSION PROVIDER.

2.1.3. Load (Required) – set of data describing the physical and contractual characteristics of the energy sink.

2.1.3.1. Resource Service Point (Required) – the physical point at which the energy is being consumed. This may vary in granularity, dependent on local business practices.

2.1.3.2. Contract Number(s) (Correctable) – reference to a schedule or agreement entered into by the Load Serving Entity and the Load and/or Distributor.

2.1.3.3. Miscellaneous Information (Correctable) – information provided at the author's option regarding the RFI.

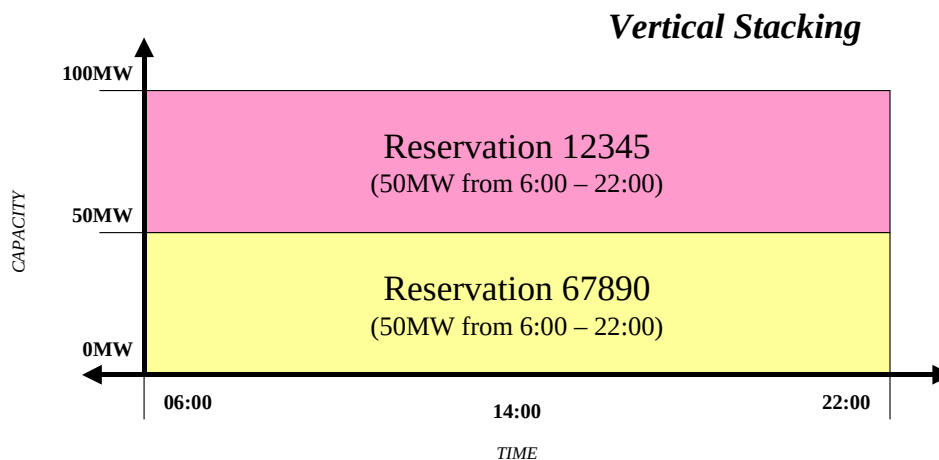
2.1.3.4. Energy Profile (Required) – energy to be consumed by the load for this RFI.

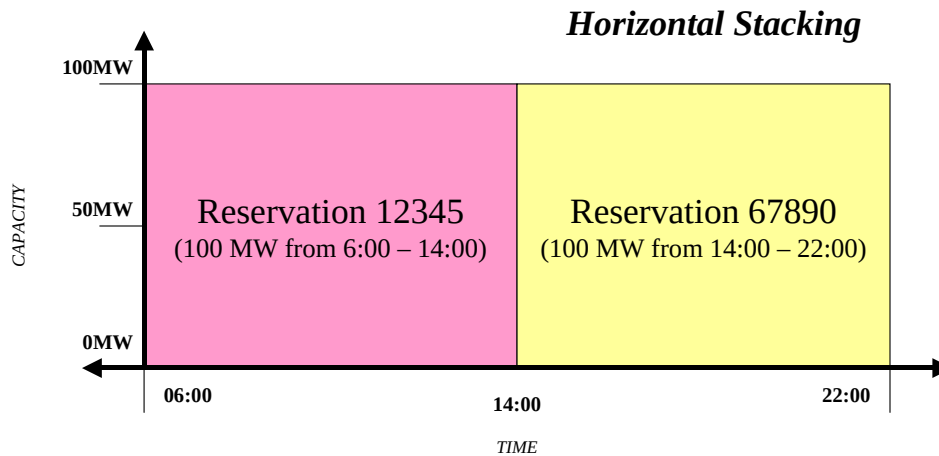
2.1.4 Using Multiple Transmission Reservations to Support a Single Leg of an Interchange Transaction

The use of multiple transmission reservations to support a single leg of an RFI is known as transmission **stacking**. There are two types of transmission stacking:

- Vertical stacking, in which a Transmission Customer combines multiple reservations to achieve a certain net level of transmission capacity, and
- Horizontal stacking, in which a Transmission Customer combines multiple reservations to achieve a certain transmission capacity coverage over time.

The following diagrams illustrate these concepts more fully. In both cases, the assumed need is 100 MW of transmission capacity for hours 06:00 through 22:00.





Should a customer elect to utilize stacking, including any combination of the two stacking types, to support their RFI, they must understand the following requirements:

- Stacks **MUST** be described through fully qualified profiles for each reservation being used
- At no point may the coverage described by the stack be less than the transmission capacity needed for the RAI's energy flow

B. Market-Related Profile Modifications (Market Adjustment)

Profile Modifications are changes to a RFI's energy profile based on market desires. Such modifications must be presented to those entities that are responsible for the implementation of the modification in order that they may **evaluate** the RFI and determine whether or not the modification can be implemented. The following information must be used to describe such a modification.

- The RFI being modified
- All necessary profile changes to set the transmission capacity or energy flow to the desired levels during the appropriate hours (including the specification of new reservations to support the request, if necessary), and
- Contact information for the person that initiated the modification.