

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 Submission and Response Timetable

## Document Subsections

- A. Eastern Interconnection – New Transactions
- B. Western Interconnection – New Transactions
- C. Interchange Transaction Corrections
- D. Interchange Transaction Modifications

## A. Eastern Interconnection – New Transactions

The table below represents the recommended business practices for RFI submission to the IA deadlines within the Eastern Interconnection. These are default requirements; some regulatory or provincially approved provider practices may have requirements that are more stringent. Under these instances, the more restrictive criteria shall be adhered to.

**Table 1: Eastern Interconnection – Timing Requirements**

Transaction Duration	PSE Submit Deadline*	Actual RFI Submission Time	Approval Entity Assessment Time	Time to Start of Transaction
Less than 24 Hours	20 Minutes prior to start	≤1 Hour prior to start	≤ 10 Minutes from tag receipt	≥ 10 Min
		>1 to <4 hours prior to start	≤20 Minutes from tag receipt	≥ 40 Min
		≥ 4 Hours prior to start	≤ 2 Hours from tag receipt	≥ 2 Hours
24 Hours or longer	4 Hours prior to start	Any	≤ 2 Hours from tag receipt	≥ 2 Hours

\*Start time references are for start of the TRANSACTION not the start of the ramp.

**B. Western Interconnection – New Transactions**

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The tables below represent the *recommended* business practices for RFI submission deadlines to the IA within the Western Interconnection. These are default requirements. The tables describe the various minimum submission and assessment timing requirements. *The BPA PBL suggests removal of “recommended” in order to establish a uniform time line throughout the Western Interconnection.*

**Table 2: Western Interconnection – Timing Requirements**

Transaction Start/Submittal Time	PSE Submit Deadline	Actual RFI Submission Time*	Approval Entity Assessment Time	Approval/Denial Notes	Time to Start of Transaction*
Start 00:00 next day or beyond when submitted prior to 18:00 of the current day	15:00 day prior to start	Any	3 hours	Passive Approval if submitted before deadline, else Passive Denial. Deferred denial	≥ 6 Hours
Start 00:00 next day and submitted between 18:00 and 23:59:59 on day prior to start – OR – start within current day		≥ 4 Hours prior to start	2 Hours from RFI receipt	Passive Approval Deferred denial	≥ 2 Hours
		<4 Hours to ≥1 Hour prior to start	20 minutes from RFI receipt	Passive Approval Deferred denial	≥ 40 Min
		<1 hour to ≥30 minutes prior to start	10 minutes from RFI receipt	Passive Approval Deferred denial	≥ 20 Min
		<30 minutes to ≥20 minutes prior to start	10 minutes from RFI receipt	Passive Approval Deferred denial	≥ 10 Min
	20 minutes prior to start	<20 minutes prior to start	5 minutes from RFI receipt	Passive Denial. Deferred denial	Submission time minus maximum time of 5 minutes

## B. Western Interconnection – New Transactions

### Notes/Clarification:

1. All clock times are in PPT.
2. RFI falling under the criteria in yellow are deemed pre-schedule requests.
3. RFI falling under the criteria in green are deemed real-time requests.
4. Pre-schedule requests submitted between 15:00 and 18:00 will be assigned LATE composite status.
5. Real-time requests submitted after 20 minutes prior to the start of the Transaction will be assigned LATE composite status.

\*Start-time references are for start of the Transaction, not the start of the ramp.

## C. Interchange Transaction Corrections

TRANSACTION Corrections may be provided by the PSE to the IA to replace non-reliability data listed in a RFI. As each correction is received, the Evaluation Time of the TRANSACTION will extend, based on the following rules:

- Each correction shall extend the evaluation time by ten minutes
- At no time can the evaluation time be extended past the start time of the TRANSACTION.
- Each correction shall reset the approval status of those entities affected by the correction
- The segment or segments corrected will be eligible for passive approval if the correction is received within the timelines specified below, except in the case where the TRANSACTION has already been set for passive denial. The segment or segments corrected will be subject to passive denial if the correction is not received within the timelines specified below. At no point may a TRANSACTION segment already under Passive Denial constraints be returned to Passive Approval eligibility.

**Table 3: Correction Submission Requirements\***

Eastern Interconnection	Western Interconnection
20 minutes prior to start	30 minutes prior to start
*Start time references are for start of the Transaction not the start of the ramp.	

## D. Interchange Transaction Modifications

Market-initiated modifications, and other TRANSACTION modifications that affect energy profiles must be received by and evaluated within certain times. The following tables describe the submission and evaluation requirements for such changes. *The BPA PBL does not recognize a need for separate timelines for Transaction Modifications within the Western Interconnect. BPA PBL recommends streamlining timetables 2,3 and 5 into one table in order to avoid confusion.*

Modification requests received by the deadlines specified below shall be considered “on time,” and are eligible for active Approval. Modification requests received past the deadlines shall be considered “late,” and are considered denied unless explicitly approved by all parties.

**Table 4: Eastern Interconnection – Modifications**

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market – Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A
Market – Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	20 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

**Table 5: Western Interconnection – Modifications**

Modification Type	Requestor Submission Deadline***	Actual Submission Time***	Evaluation Time
Reliability (Curtailments or Reloads)	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
Market – Committed Transmission Reservation(s) Reductions	N/A	N/A	N/A
Market – Committed Transmission Reservation(s) Increases, Energy Reductions, Energy Increases*	25 minutes prior to modification start**	Less than 30 minutes to start	10 minutes
		30 minutes or more prior to start	15 minutes
***Start time references are for start of the Transaction not the start of the ramp.			

\*See Special Exception for Cancellations below

## D. Interchange Transaction Modifications

\*\*If received after deadline, requires active approval or will be passively denied

### Special Exception for Cancellations

A cancellation is defined as setting both committed transmission reservation(s) and energy flow to zero for the duration of the TRANSACTION **prior** to the start of a TRANSACTION but **following** that TRANSACTIONS approval. In the event that a PSE elects to cancel a TRANSACTION, the following timelines should be utilized:

**Table 6: Special Exception for Cancellations Submission and Evaluation Timing**

Region	Submission Deadline*	Evaluation Time
Eastern Interconnection	15 minutes prior to transaction start	If received by deadline, no evaluation required. Request is automatically approved.
		If not received by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
Western Interconnection	20 minutes prior to transaction start	If received by deadline, no evaluation required. Request is automatically approved.
		If not by deadline, request is not eligible for Special Exception for Cancellations, and must be processed normally.
*Start time references are for start of the Transaction not the start of the ramp.		