Comment Letter on BPA's Transmission Planning, Queue Reform Initiatives & TC-27

Subject: Immediate Processing of De Minimis Redirect Requests

Background

The signatories of this letter, representing electric utilities and other Point-to-Point (PTP) transmission service customers, we appreciate the opportunity to comment on Bonneville Power Administration's (BPA) proposed transmission planning reforms, future state vision, and the TC-27 proceedings. While TC-27 encompasses several initiatives, this letter focuses specifically on the immediate need to resume processing of Redirect Requests with *de minimis* system impacts.

These comments are submitted to address this specific issue dealing with Redirect Requests, which is an issue within a broader set of topics currently under consideration by BPA and transmission customers. We emphasize that this important, but limited scope of request does not diminish the significance or magnitude of other outstanding issues of changes being considered. All remaining matters continue to be of critical importance to our organizations and the region. Their resolution remains essential regardless of the outcome of this request.

Previous Rights and Procedural Disparities

Prior to the Transmission Service Request (TSR) processing pause, PTP customers held the right to redirect confirmed Firm Long-Term (LT) transmission service. In evaluating these Long-Term Firm (LTF) Redirect requests, BPA applies specific criteria to determine system impacts, including two distinct tests for *de minimis* status, as detailed in BPA's *TSR Evaluation Business Practice*.

Since BPA paused TSR queue processing, LTF Redirects with *de minimis* impacts are no longer evaluated. While Short-Term Firm (STF) Redirects remain available, the *de minimis* evaluation criteria for STF requests are significantly more stringent than those for LTF requests:

- **LTF Redirects (Net Impact):** BPA calculates the "net impact" by subtracting the impact of the Parent reservation (Path B) from the requested Child Redirect (Path A) before applying *de minimis* tests. This ensures customers are only evaluated on the incremental impact added to the system.
- **STF Redirects (Standalone Impact):** Conversely, the system evaluates the STF Redirect (Child) in isolation. The *de minimis* criteria are applied to the Redirect without regard for the rights held by the Parent reservation.

A detailed comparison of these criteria from BPA's Business Practice is provided in Appendix A, with illustrative examples in Appendix B showing where a request would pass under LTF rules but fail under STF rules.

Current Operational Impact

Due to the stricter *de minimis* criteria for STF Redirects, a significant portion of LTF TSRs cannot be redirected on a firm basis to alternative POR/POD combinations. Consequently, PTP customers are increasingly forced to rely on non-firm redirects, such as Secondary Hourly (1-NS), on a day-ahead basis to deliver power. Beyond the inherent reliability risks of non-firm service, this creates substantial economic exposure; most Power Purchase Agreements (PPAs) and WSPP contracts impose financial penalties for utilizing non-firm transmission or for any resulting curtailments.

TC-27 Proposal on Processing De Minimis TSRs

Within the TC-27 initiative, BPA is proposing a partial reopening to evaluate LTF Redirect TSRs that result in *de minimis* impacts. To manage system constraints and prevent a surge in requests, BPA has proposed limitations, such as restricting customers to one Redirect request per original reservation. While these limitations do not represent a full restoration of PTP customer rights, we strongly support BPA's proposal to begin processing *de minimis* Redirects, effective immediately, during the transition to a permanent transmission policy. We recommend discussion regarding future treatment of Redirect requests and what limitations would be appropriate on a permanent basis.

The following entities support the immediate processing of *de minimis* Redirects:

Company	Name	E-mail
Dynasty Power	Michael Chai	mchai@dynastypower.com
Tacoma Power	Leslie Almond	LAlmond@tacoma.gov
Grant County PUD	James Dykes	jdykes@gcpud.org
Seattle City Light	Michael Watkins	Michael.Watkins@seattle.gov
Portland General Electric	Laura Green	laura.green@pgn.com
Avista Corporation	Chris Drake	Chris.Drake@avistacorp.com
Brookfield Renewables US	Steve Greenleaf	Steve.Greenleaf@brookfieldrenewable.com
NewSun Energy	Alex Swerzbin	aswerzbin@newsunenergy.net
PacifiCorp	Tony Worthington	Tony.worthington@pacificorp.com
Puget Sound Energy	Laxman Subedi	Laxman.Subedi@pse.com
Avangrid	Tashiana Wangler	Tashiana.Wangler@avangrid.com

Appendix A: Comparison of De Minimis Criteria for LT Redirects and ST Redirects

Below is a summary of De Minimis Criteria from BPA's TSR Evaluation Business Practice

Long-Term (LT) De Minimis: Uses Net Impact

For Long-Term requests, the system explicitly subtracts the impact of the Parent (B) from the Child (A) before running the de minimis test.

- **The Calculation**: The test looks at *(A - B),* which is the **Net Impact**
- **The Logic**: You are only tested on the incremental impact you are adding to the system. If your net impact is <=10 MW (and you meet the PTDF or Ratio threshold), you are considered de minimis

Short-Term (ST) De Minimis: Uses Child Impact Only

For Short-Term requests, the system looks at the Redirect (Child) in isolation.

- **The Calculation**: The test looks at *A* only. It does **not** look at *(A - B)*.
- **The Logic**: BPA's BP states: "When evaluating Redirects under de minimis Test 1, the impact of the Redirect is considered on its own **without regard for the impact of the Parent Reservation**".
- **The Consequence**: Even if your net increase is tiny (e.g., 1 MW), if the total flow of the Redirect (the Child) on that path is greater than 10 MW or has a PTDF > 10%, it fails the de minimis test.

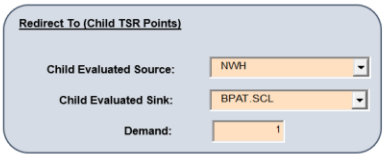
Feature	**Long-Term De Minimis**	**Short-Term De Minimis**
Input for MW Test	**Net Impact** *(A - B)*	**Child Impact Only** *(A)*
Credit for Parent?	**Yes.** You are credited for existing rights on Path B.	**No.** You are treated as a new standalone request for the *de minimis* check.

Appendix B: Examples where LTF redirect would pass but STF redirect could potentially fail

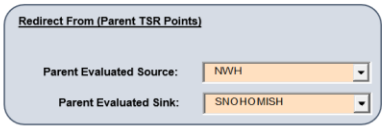
Example 1

Evaluates a TSR redirect from NWH-SNOHOMISH to NWH-BPAT.SCL.

- Despite a minimal net impact on Cascade North flowgate of 0.0037, STF redirect would potentially fail if ATC on this flowgate is 0
    - Child impact > Parent impact
    - Child impact (gross, not net) on flowgate is 0.8247 which is greater than 0.1
- However, LTF redirect would pass due to De Minimis rule.
    - Net impact of 0.0037 is less than 0.1



Redirect To (Child TSR Points)		
Zone	kV	Owner Name
NA	NA	NA
NA	NA	NA



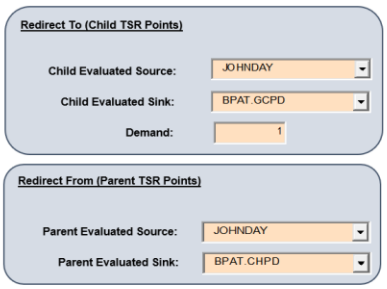
Redirect From (Parent TSR Points)		
Zone	kV	Owner Name
NA	NA	NA
Seattle Area, Olympic Peninsula	115	Bonneville Power Admin

	Sub Grid Constrained Area:	ALL MIDC AREA		Sub Grid Constrained Area:	ALL MIDC AREA				
	PTDF #:	357	151	PTDF #:	357	40988			
Flowgate		Child Source: NWH	Child Sink: BPAT.SCL	Child Impact	Parent Source: NWH	Parent Sink: SNOHOMISH	Parent Impact	Net Impact	Result
CROSS CASCADES NORTH E>W		-0.0402	-0.8649	0.8247	-0.0402	-0.8612	0.8210	0.0037	Potential LTF
CROSS CASCADES SOUTH E>W		0.0175	-0.0672	0.0847	0.0175	-0.0537	0.0712	0.0000	No Impact
NORTH OF HANFORD N>S		-0.0302	-0.0314	0.0012	-0.0302	-0.0284	0.0000	0.0000	No Impact
RAVER-PAUL N>S		-0.0133	0.0370	0.0000	-0.0133	0.0340	0.0000	0.0000	No Impact
SOUTH OF ALLSTON N>S		-0.0165	0.0754	0.0000	-0.0165	0.0602	0.0000	0.0000	No Impact
NORTH OF PEARL S>N		0.0036	-0.0476	0.0512	0.0036	-0.0381	0.0417	0.0000	No Impact
WEST OF JOHN DAY E>W		-0.0118	-0.0257	0.0139	-0.0118	-0.0207	0.0089	0.0000	No Impact
WEST OF SLATT E>W		-0.0002	-0.0184	0.0182	-0.0002	-0.0142	0.0140	0.0000	No Impact
WEST OF LOWER MONUMENTAL E>W		-0.0341	-0.0258	0.0000	-0.0341	-0.0189	0.0000	0.0000	No Impact
SOUTH OF CUSTER N>S		-0.0070	-0.0323	0.0253	-0.0070	-0.0378	0.0308	0.0000	No Impact
NORTH OF ECHO LAKE S>N		-0.0004	-0.3207	0.3203	-0.0004	-0.3866	0.3862	0.0000	No Impact
WEST OF MCNARY E>W		0.0166	-0.0184	0.0350	0.0166	-0.0151	0.0317	0.0000	No Impact
WEST OF HATWAI E>W		0.0181	0.0461	0.0000	0.0181	0.0565	0.0000	0.0000	No Impact
NORTH OF GRIZZLY N>S		0.0052	0.0017	0.0035	0.0052	0.0008	0.0044	0.0000	No Impact

Example 2

Evaluates a TSR redirect from JOHNDAY-BPAT.CHPD to JOHNDAY-BPAT.GCPD.

- Despite a minimal net impact on West of JD flowgate of 0.0015, STF redirect would potentially fail if ATC on this flowgate is 0 due to:
    - Child impact > Parent impact
    - Child impact (gross, not net) on flowgate is 0.1702 which is greater than 0.1
- However, LTF redirect would pass due to De Minimis rule.
    - Net impact of 0.0015 is less than 0.1



Redirect To (Child TSR Points)		
Zone	kV	Owner Name
Southern Oregon	500	Bonneville Power Admin
NA	NA	NA

Redirect From (Parent TSR Points)		
Zone	kV	Owner Name
Southern Oregon	500	Bonneville Power Admin
NA	NA	NA

Sub Grid Constrained Area:		ALL MIDC AREA		Sub Grid Constrained Area:		ALL MIDC AREA			
PTDF #:	40687	351		PTDF #:	40687	361			
Flowgate	Child Source: JOHNDAY	Child Sink: BPAT.GCPD	Child Impact	Parent Source: JOHNDAY	Parent Sink: BPAT.CHPD	Parent Impact		Net Impact	Result
CROSS CASCADES NORTH E>W	-0.1555	-0.0378	0.0000	-0.1555	-0.0547	0.0000		0.0000	No Impact
CROSS CASCADES SOUTH E>W	-0.0449	0.0196	0.0000	-0.0449	-0.0017	0.0000		0.0000	No Impact
NORTH OF HANFORD N>S	-0.6198	-0.0550	0.0000	-0.6198	-0.0165	0.0000		0.0000	No Impact
RAVER-PAUL N>S	-0.0979	-0.0153	0.0000	-0.0979	-0.0003	0.0000		0.0000	No Impact
SOUTH OF ALLSTON N>S	-0.1569	-0.0195	0.0000	-0.1569	0.0044	0.0000		0.0000	No Impact
NORTH OF PEARL S>N	0.1123	0.0045	0.1078	0.1123	-0.0061	0.1184		0.0000	No Impact
WEST OF JOHN DAY E>W	0.1595	-0.0107	0.1702	0.1595	-0.0092	0.1687		0.0015	Potential LTF
WEST OF SLATT E>W	-0.2271	0.0022	0.0000	-0.2271	-0.0028	0.0000		0.0000	No Impact
WEST OF LOWER MONUMENTAL E>W	-0.0448	-0.0266	0.0000	-0.0448	-0.0250	0.0000		0.0000	No Impact
SOUTH OF CUSTER N>S	0.0016	-0.0044	0.0060	0.0016	-0.0094	0.0110		0.0000	No Impact
NORTH OF ECHO LAKE S>N	0.0410	-0.0001	0.0411	0.0410	-0.0305	0.0715		0.0000	No Impact
WEST OF MCNARY E>W	-0.1334	0.0249	0.0000	-0.1334	0.0057	0.0000		0.0000	No Impact
WEST OF HATWAI E>W	0.0852	0.0143	0.0709	0.0852	0.0193	0.0659		0.0000	No Impact
NORTH OF GRIZZLY N>S	-0.6802	0.0030	0.0000	-0.6802	0.0034	0.0000		0.0000	No Impact