

Concurrent Loss Returns FAQ

This document provides answers to some basic questions about the implementation of concurrent loss returns. BPA has developed a Concurrent Losses User Guide that provides additional information about the implementation of concurrent loss returns.

The [Real Power Loss Return](#) business practice provides all of the details and requirements for returning real power losses to BPA.

A. Overview

Q 1. When will BPA's concurrent loss return option go into effect?

Concurrent loss returns will "go live" HE 12 on October 2, 2023.

Q 2. Once concurrent loss returns go live, will that be the only option for returning losses?

No. BPA will continue to offer the option for all customers to financially settle loss return obligations. In addition, a customer with a Regional Dialogue Slice/Block power sales agreement has the option to return losses through an adjustment to the customer's slice output energy.

Q 3. Once concurrent loss returns go live, will BPA continue to offer the option for delayed loss returns 168 hours after service is provided?

No. The concurrent loss return option is replacing the delayed loss return option provided in version 16 of the Real Power Loss Return business practice. The only exception is for a limited number of non-OATT agreements that specify delayed loss returns.



Q 4. Is BPA revising the Real Power Loss Returns business practice in connection with the implementation of concurrent loss returns?

Yes. BPA posted proposed revisions (version 17) to the business practice for review in July 2022 and more recently posted some additional proposed revisions on July 31, 2023. Among other things, the revisions removed the option for delayed in-kind loss returns and replaced it with the concurrent in-kind loss return option. Under the proposed revisions to the business practice, “In-Kind Loss Returns” refers to concurrent returns rather than delayed returns.

B. Loss Election Process

Q 5. How do I elect the loss return service I want to use?

Submit a [Notification of Real Power Loss Return Service form](mailto:RPLPForm@bpa.gov) to RPLPForm@bpa.gov. Please see the Real Power Loss returns business practice for all the requirements and details for making an election.

Q 6. If I want to keep the same type of loss return service that I currently have, do I need to submit a new Loss Election Form?

No. Every customer currently taking transmission service from BPA should already have an election form on file. To continue with the same type of loss return service you do not need to submit a new Loss Election Form, however:

- Customers that are currently using delayed Loss returns will be converted to concurrent Loss returns unless they elect a different option.
- Customers who want to continue to use Financial Loss Returns need to have a confirmation agreement in place by August 31.

Q 7. If I do want to elect a different loss return service than I currently use, is there a deadline for submitting my new Loss election form?

Yes. All Loss election forms must be submitted by August 31. In addition, if you want to elect or continue financially settling your loss return obligations, you also must have the required agreement with power services in place by August 31.

Q 8. When does my Loss election go into effect?


Loss elections go into effect on October 1. Once you make an election, it remains in effect until you elect a different service by resubmitting an election form (unless you default to concurrent returns – see next Q&A). Customers are only allowed to change elections starting with the next fiscal year (October 1 – September 30). Mid-year changes are not allowed.

Q 9. What happens if I currently use Financial Loss Returns, but I do not meet the deadline for signing the required agreement with Power Services?

By default, your Loss election will *automatically* switch over to In-Kind Concurrent Loss returns starting October 1. For additional information, see the [Real Power Loss Return](#) Business Practice.

C. OATI CDE – Daily Concurrent Loss Obligation Screen: Access / Functionality

Q 10. Where will I find my Daily Concurrent Loss Obligations?

Daily Concurrent Loss Obligations will be a new screen available in CDE. If you do not see Daily Concurrent Loss Obligation as an option on the CDE drop down menu, you may need to click on the Refresh Menu icon  on to top left hand corner of your screen.

Q 11. How do I request access to the OATI CDE Daily Concurrent Loss Obligation screen?

Complete and submit the [Customer Data Entry \(CDE\) System Access form](#) to txcbs@bpa.gov.

If your company already has access to CDE, reach out to your company's CDE Security Officer to ask that they put in a request for you to have access. Only CDE Security Officers are authorized to request new user access.

Note: Before a user can be granted access, the user must have an OATI WebCares Certificate installed to access CDE.

Q 12. I know I have access to CDE but when I attempt to login, I get a messaging saying, "User is Inactive." What should I do?

Contact txcbs@bpa.gov requesting that your account be reactivated. CDE accounts are automatically inactivated if the user has not logged into CDE for a long time. This applies to either production and/or development environments.

Q 13. I currently elect In-Kind Loss Return service and already use OATI CDE to view my Loss Obligation. Do I need to request access to the OATI CDE Daily Concurrent Loss Obligation screen in order to see my Loss Obligations starting October 2, 2023?

No. If you currently elect In-Kind Loss Returns and already have access to OATI CDE, you will automatically be granted access to the new OATI CDE Daily Concurrent Loss Obligation screen.

Q 14. What do the different rows mean in the OATI CDE Daily Concurrent Loss Obligation screen?

See the [Concurrent Losses User Guide](#).

Q 15. If I am a 3rd Party Loss Provider for a customer, will I be able to access / filter for the customer's Loss data in the OATI CDE Daily Concurrent Loss Obligation screen?

Yes. If you currently are a 3rd party Loss Provider, you will automatically be granted access to the new OATI CDE Daily Concurrent Loss Obligation screen and see Loss data for all applicable customer contracts.

Q 16. I don't see all my transmission contracts on the CDE Daily Concurrent Loss Obligation screen.

The Daily Concurrent Loss Obligation screen will only display the contracts that have Concurrent Loss Obligations for the filtered date.

D. Loss Obligation Posting / Loss Return Timing**Q 17. How often will my Loss Obligations get posted to CDE?**

Please see the [Real Power Loss Return](#) business practice for details about the timing of loss return obligations.

Q 18. Will I incur EIM Imbalance if I submit my Loss Return e-Tag later than 57 minutes prior to the start of flow (T-57)?

Yes. Loss Return e-Tags are subject to EIM Imbalance.

Q 19. How does the timing differ for Slice customers?

For Slice Output Loss Return Service, the Customer will return Real Power Losses through an adjustment to the Customer's Slice Output Energy Schedule for the hour of flow equal to the Real Power Losses calculated as of 85 minutes (T-85) prior to the hour of flow.

E. API Query

Q 20. What is the URL to the Dev API?

The URL to the Dev API is:

https://dev.bpa.oati.com/sched_bpa/interfaces/xml/ConcurrentLosses/sched-concurrent-losses-webservice.wml

Q 21. What is the URL to the Production API?

The URL to the Production API is:

https://www.bpa.oati.com/sched_bpa/interfaces/xml/ConcurrentLosses/sched-concurrent-losses-webservice.wml

Q 22. I currently have a connection to pull in CDE data (Losses, Load Estimates, Gen Estimates, etc.). Will these connections still work after concurrent losses go-live or will those connections need to be updated using the new API?

The Concurrent Loss SOAP endpoint is an additional web service provided by BPAT. The CDEs Set and GetAncillary, Wheeling Loss, and Portfolio Manager SOAP endpoints are not changing and will continue to function as designed.

Q 23. Will I need a new certificate to connect to the new Concurrent Loss SOAP endpoints?

No, the existing certificate that you use to pull in CDE data will also work for the new Concurrent Loss data pull.

F. Loss Imbalance

Q 24. How are Loss Imbalances settled?

Loss Imbalances which appear on the “Financial Obligation kW” row of the Daily Concurrent Loss Obligation report are financially settled on customers’ monthly transmission bills. Information regarding the rate can be found in section J. Real Power Loss Imbalance Settlement of the [Transmission Rate Schedule](#).

Q 25. Will I need to settle a loss imbalance during a negative priced LAP hour?

BPA will waive the loss imbalance portion of the obligation to return Real Power Losses for any hour in which the price in the Real Power Loss Imbalance Settlement rate schedule is negative.

Q 26. For hours where my Loss Obligation is waived during OMP events, will I still need to financially settle loss imbalance?

Yes. The physical Loss Obligation posted as of T-30 will be waived during OMP events, however, any additional changes to the Loss Obligation for that hour that occur after T-30 will still be financially settled as a loss imbalance credit or charge.

Q 27. Will I still settle loss imbalance for hours where I am assigned an Invalid Loss Return Penalty (ILRP)?

Yes. Any credits or charges resulting from loss imbalance will still be settled financially as normal. The loss imbalance settlement is in addition to the ILRP charges that may apply to that same hour.

G. Concurrent Loss Return No-Charge Daily/Hourly Loss Reservations

Q 28. What types of No-Charge Loss Reservations are available?

There are 3 types of No-Charge Loss Reservations:

- Hourly
- Daily
- Non-Firm Hourly

For more details, see the [Requesting Transmission Service Business Practice](#).

Q 29. If I'm returning concurrent losses, can I still use the existing F-DAILY LOSS RETURN and F-HOURLY LOSS RETURN products for my loss return tags?

Yes. All In-Kind returns can use the 3 No-Charge Loss Reservations.

Note that there are availability limitations for the products:

- The original F-DAILY LOSS RETURN and F-HOURLY LOSS RETURN products are available for reserving until 3pm of the preschedule day.
- The new NF-HOURLY CONC LOSS RETRN product becomes available for reserving at 3pm of the preschedule day.

Q 30. Can I acquire more than one No-Charge Loss Reservation for a single hour if I need additional capacity to cover my Loss Obligations?

Yes. See the Concurrent Loss User Guide for additional information.

Q 31. What if I acquire more capacity than I wind up needing on my No-Charge Loss Reservation?

BPA requests that you estimate the amount of capacity you will require to cover your Loss Obligations as accurately as possible. No-Charge Loss Reservations still consume ATC/AFC on the system and BPA does not want to cause easily avoidable constraints. Remember, you can always request additional No-Charge Loss Reservations as needed, and in some cases, you

can request your TSR be annulled and/or relinquish or withdraw it yourself.

H. Concurrent Loss Return E-Tag Suffixes

Q 32. Do I still need to specify Loss Suffixes on my Loss Return e-Tags?

No. BPA will no longer require Loss Suffixes on Concurrent Loss Return e-Tags. Note – Loss Suffixes are still required for Non-OATT In-Kind 168hr delayed Loss Return e-Tags.

I. Contributing Schedules

Q 33. Are EIM (ETSR) tags included in the concurrent loss obligations?

No, all EIM transfers using the BPA transmission system will be exempt from real power loss returns during EIM participation. E-Tags for EIM Transfers, including wheel-through EIM Transfers, will utilize a real power loss suffix on the BPA AREFs (-EIM).

J. Concurrent Losses Rates

Q 34. What transmission rates apply to concurrent loss returns?

BPA adopted the Real Power Loss Imbalance Settlement charge and the Invalid Loss Return Penalty charge in the BP-24 rate case. The Real Power Loss Imbalance Settlement Charge provides for the financial settlement of the loss imbalance portion of a customer's concurrent loss return obligation. The Invalid Loss Return Penalty applies if a customer that has elected concurrent loss returns does not timely return the amount of losses the customer owes.

K. Concurrent Loss Invalid Loss Return Penalty (ILRP)

Q 35. How is the Invalid Loss Return Penalty (ILRP) amount calculated?

Information regarding the ILRP calculation can be found on the [Transmission Rate Schedule](#). Below are the ILRP formulas for reference:

Under-Delivery + Positive LAP Price:

- Under Delivery = Loss Obligation – Returned Amount
- (Under Delivery kw x Capacity Rate) +
(Under Delivery kw x 250% of the Energy Price)

Under-Delivery + Negative LAP Price:

- Under Delivery = Loss Obligation – Returned Amount
- (Under Delivery kw x Capacity Rate) + (Under Delivery kw x \$0)

Over-Delivery + Positive LAP Price:

- Over Delivery = Returned Amount – Loss Obligation
- (Over Delivery kw x Capacity Rate) + (Over Delivery kw x \$0)

Over-Delivery + Negative LAP Price:

- Over Delivery = Returned Amount – Loss Obligation
- (Over Delivery kw x Capacity Rate) +
(Over Delivery kw x 250% of the absolute value of the Energy Price)

Q 36. What information is needed to request a waiver of an Invalid Loss Return Penalty (ILRP), and how do I submit one?

The request must be submitted in writing to the Customer's assigned Transmission Account Executive and include all of the information necessary to demonstrate it satisfies the criteria for a waiver or reduction in the Transmission Rate Schedules. The customer should make best efforts to submit the request within 60 Calendar Days of the transmission bill with the ILRP charge. For more of a timely response, it is recommended that you provide as much information as possible to allow a thorough review.

Q 37. Will the ILRP apply during Reliability Events?

No. The ILRP will not apply for any hour in which BPA has issued a curtailment or reload that impacts the customer's BPA-calculated loss obligation or the customer's loss return e-tag between T-67 prior to the start of the hour of flow and the end of the hour of flow. If there is a multi-hour Reliability Event, the penalty will not apply for the first hour of the event – any ILRP during subsequent hours are subject to the penalty.

Q 38. Does the ILRP penalty apply when in-kind loss return obligations have been waived during OMP events?

No. The penalty does not apply to in-kind loss return obligations waived during OMP events. BPA does, however, expect customers to adjust any loss return tags to reflect the waived loss obligation amount posted in the T-30 line of the OATI CDE Daily Concurrent Loss Obligation screen. BPA expects customers to make the adjustment at least by T-20 prior to the start of flow of the hour impacted by the OMP event.

L. Slice Customers & Concurrent Losses**Q 39. How does Concurrent Loss Obligation Posting and Loss Return timing differ for Slice customers?**

For Slice Output Loss Return Service, the Customer will return Real Power Losses through an adjustment to the Customer's Slice Output Energy Schedule for the hour of flow equal to the Real Power Losses calculated as of 85 minutes (T-85) prior to the hour of flow (the "T-85 Loss Return Obligation").

M. Financial Losses

Q 40. I've elected to return losses Financially. How are my financial obligation amount calculated?

1. Net Schedules are multiplied by the network loss factors as defined in Schedule 11 of the [Open Access Transmission Tariff](#). This number is what is referred to as the Loss Obligation amount.
2. The Loss Obligation amount is then multiplied by two rates – the Energy Rate and Capacity Rate to render the Energy price and Capacity charge for the Losses.
3. The Energy Rate is the Load Aggregation Point (LAP) price set by CAISO. This is a varying price and can be found on CAISO OASIS under Prices > Hourly RTM LAP Prices.
4. The Capacity Rate is a fixed rate as defined in Section 9.2 of the [Power Rate Schedule](#).

Q 41. I financially settle my loss obligations. Do I check the Daily Loss Report or the Daily Concurrent Loss Obligation Report for my loss obligations?

For customers who financially settle their loss obligations, the existing Daily Loss Report (DLR) will be where loss obligations and contributing schedules are displayed. There will be no data on the new Daily Concurrent Loss Obligation report for customers who financially settle loss obligations.

When reconciling the Service Amount (kWh) on the bill to the loss obligation amount on the DLR, note that you will need to match the Transmission Schedules date on the DLR to the Operating Date on the bill, and not the Daily Loss Report date on the DLR.

Q 42. I don't see my financial loss obligation amounts on the Daily Loss Report. When will I see my obligation amounts?

For customers who have elected to financially settle their loss obligations, the loss obligation amount is calculated at the end of the month and the loss obligation amount will appear on the Daily Loss Report by the beginning of the following month.