

## Final - Transmission Service Request Data Exhibit Validation Requirements Enforcement

September 3, 2024

BPA is currently experiencing unprecedented activity in its queue for long-term firm transmission service and is announcing measures to help address the challenges posed by this activity.

As of the August 15, 2024 deadline for submitting transmission service requests (TSRs) for the 2025 cluster study, BPA's queue includes approximately 68,000 MW of new requests for long-term firm transmission service. This follows the completion of the 2023 Cluster Study, which included over 16,000 MW of TSRs. BPA is concerned that the volume of new TSRs, in combination with the degree of uncertainty in the underlying information, presents challenges for the queue, the resources required to effectively validate the Data Exhibits for the TSRs, and the success of BPA's future Cluster Studies. BPA believes it is important to act now so the queue continues to function in a manner consistent with open access principles as well as to better enable the Cluster Study process to continue to provide meaningful results.

Effective immediately, BPA will strictly enforce the existing Data Exhibit requirements for customers to provide detailed underlying information about a TSR. These requirements help ensure that all TSRs in the queue represent good faith requests for service and are supported by sufficient information for BPA to effectively study and plan for regional transmission needs. BPA has observed issues associated with the resource and load information provided in an increasing number of Data Exhibits. Customers should not provide inaccurate load and resource information merely to comply with the Data Exhibit requirements. As submitted, TSRs and associated Data Exhibits should reflect expected use of the transmission system.

BPA will strictly enforce the information requirements for Data Exhibits that have not yet been validated. **BPA will also be reexamining the information in Data Exhibits that have previously been validated for TSRs that are potentially eligible for the 2025 cluster study.** BPA will contact customers by email about any deficiencies in a Data Exhibit and provide the opportunity to correct the deficiency. For any deficiencies that are not corrected within the applicable timelines stated in BPA's [Requesting Transmission Service Business Practice](#), sections F.5. and F.8., the TSR will be declined on OASIS.

Some of the primary requirements on which BPA is increasing its focus include:

1. The information supplied for "NEWPOINT" requests. BPA reserves the right to determine the sufficiency of a plan of service identified for a NEWPOINT point of receipt (POR) or point of delivery (POD).
2. Identification of the rights to deliver energy to the POR. Identification of such rights include demonstration of a business relationship with the owner of the energy being delivered, such as the owner of the cited Generation Facility specified in the Data Exhibit. BPA may accept generic generation sources such as "market purchase" for PORs that are established trading points for energy transfers such as NWH, BIGEDDY, JOHNDAY, COB, or NOB.

The following are examples of the business relationships that BPA would accept:

- a. The customer submitting the TSR is the same as the legal entity or shares common ownership with the entity that owns the Generation Facility or Generator Interconnection Request from BPA's interconnection queue cited in the Data Exhibit.
  - b. Demonstration that the owner or developer of the cited Generation Facility is selling or intends to sell the output of the facility and the TSR submitter intends to purchase the output.
  - c. If the resource cited in the data exhibit is not located at the POR of the TSR, long-term transmission rights to deliver energy from the resource to the POR.
  - d. Other demonstration of business relationship that creates a reasonable expectation that the transmission service will be utilized consistent with the Generation Facility information cited in the Data Exhibit.
3. Demonstration of a reasonable expectation that the Receiving Party may take delivery of the energy at the POD. This requirement will not apply to a TSR with a POD that connects to an adjoining transmission system on which another transmission provider offers OATT service such that the Receiving Party would be expected to take OATT service from the POD on the adjoining system.

The following are examples of acceptable demonstration:

- a. An approved action plan from an Integrated Resource Plan (IRP) that has been acknowledged, accepted, or otherwise approved and indicates that the Receiving Party expects to hold a process to acquire generation for which the transmission service request could be utilized.
- b. Verifiable intention of the load-serving entity to take actions that might reflect a need for the requested transmission service (for example, to conduct a request for proposal for which the requested transmission service could be used to participate).
- c. In the case of a request for point-to-point service for delivery to a network integration customer, documentation that such customer is interested in serving a portion of its load on point-to-point service.
- d. Other demonstration of a business relationship that creates a reasonable expectation that the transmission service will be utilized consistent with the Receiving Party information cited in the Data Exhibit.
- e. For delivery to a market hub, customer may enter "market delivery."

In response to customer feedback, for TSRs submitted through the close of the 2025 cluster study window, BPA may provide more than one cure period if a customer notifies BPA it is working with the Receiving Party identified in a Data Exhibit to obtain information to demonstrate the reasonable expectation the Receiving Party may take delivery at the POD.

If BPA has questions for the requestor regarding information in the Data Exhibit, BPA will contact the Customer's point of contact provided in the Data Exhibit. In addition, Customers should expect that BPA will contact entities identified by the TSR requestor in a Data Exhibit to verify information provided to demonstrate business relationships. Demonstration of business relationships is an ongoing requirement. Customers should notify BPA of any changes to information in a Data Exhibit for further evaluation.

BPA reserves the right to identify other Data Exhibit validation requirements consistent with the OATT

not described herein or in the current relevant Business Practices.

See updated Data Exhibit instructions to reflect this notice in the [NT Data Exhibit](#) and [PTP Data Exhibit](#) forms on the [Business Practices forms page](#).

Questions may be sent to [TXDataExhibits@bpa.gov](mailto:TXDataExhibits@bpa.gov).