

Response to Comments – Operating Reserves

BPA Transmission Business Practice

Version 18
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Response to Comments – Operating Reserves

Version 18

This document contains comments and BPA responses regarding Version 18 of the Operating Reserves Business Practice posted for comment from July 13 to August 18, 2026.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. Snohomish PUD

Snohomish PUD appreciates the opportunity to comment on the proposed Operating Reserves v18 business practice. Snohomish understands that BPA is proposing these changes as it transitions away from the BAL-002 standard and adopts the Western Power Pool Operating Reserve standards and practices. While most of Snohomish's questions were answered at the public meeting held on July 21, 2026, we have the following suggestions for BPA to consider for inclusion in the Business Practice itself, or implement from a process perspective:

General Recommendations

- Snohomish believes that transparency is important when calculating the annual Operating Reserve values. To that end, Snohomish recommends that:
 - The Business Practice should include a schedule with specific dates (or date ranges) supporting annual revisions of the Operating Reserve value and the effective date of such revisions.
 - BPA hold an annual public meeting discussing any updates to BPA's annual Operating Reserve value. Because this value is the basis for all customer reserve holdings, it is helpful for customers to be aware of any changes and understand how the methodology applies to BPA.
 - BPA should also provide opportunities for customers to meet with BPA staff individually to understand the calculation of their specific shares of BPA's overall value.

BPA Response 1

Annual revisions of the Operating Reserve values are based on the Western Power Pool schedule and meeting dates. Once the Western Power Pool determines annual Operating Reserve values, BPA will notify Customer of BPA's yearly Western Power Pool Contingency Reserve Obligation amount. BPA will also directly communicate with self-supply Customers to provide their updated yearly Operating Reserve obligation. Individual customers are always welcome to contact BPA and request meetings through their Account Executive.

BPA has added Section E.2 to the business practice to address the schedule for annual revisions as follows:

- “2. BPA will directly communicate with self-supplying Customers to provide their updated yearly Operating Reserve obligation.”
- For customers electing to utilize third-party provision of Balancing Reserves, BPA should provide a methodology and/or operational data by which those customers may distinguish their own Operating Reserve obligation from the aggregated obligation of their third-party provider.

BPA Response 2

Because these comments are directed at changes to the Operating Reserves Business Practice, BPA assumes that Snohomish’s comment is intended to refer to Operating Reserves, and not “Balancing Reserves.” Customers with third-party providers will receive their individual yearly Operating Reserve obligation amount separate from the aggregated obligation of their third-party provider.

BPA has added Section E.2.a to the business practice to address this concern as follows:

- “a. Customers with third-party providers will receive their individual yearly Operating Reserve obligation amount separate from the aggregated obligation of their third-party provider.”
- Because the new methodology significantly reduces the amount of held Operating Reserves compared to historical values, Snohomish would like BPA to discuss in a future meeting the associated cost impacts (if any) for BPAT and BPA Power.

BPA Response 3

The cost impacts of the new Operating Reserve levels will be discussed during the BP-29 rate case pre-proceeding workshops.

Specific Recommendations

- In Section B (5) BPA changes the election date for self-supply or third-party provision of Operating Reserves from May 1 to April 1. Snohomish understands that BPA’s annual update of its overall Operating Reserve obligation will be determined in the March / April timeframe and will be based on previous year actuals. This gives customers very little time to evaluate their anticipated share of future Operating Reserves and make an informed business decision about whether to continue supplying from BPA.
 - Snohomish recommends that BPA maintain the May 1 election date.
 - This election date recommendation would also apply in Section D (1)(a) and (2)(a). Snohomish also observes that the references to “next rate period” in these sections may be ambiguous when describing “Start of Rate Period” and “During Rate Period” changes given the associated notification dates.
 - Snohomish recommends BPA include clarifying language specifying new provider start dates associated with rate periods.

BPA Response 4

BPA is aligning Operating Reserve and Balancing Reserve election timeframes. Operating Reserve supplier elections are made in April before the start of a new rate period, becoming active in October when the new rate period begins. The Contingency Reserve Obligations from the Western Power Pool are updated on a yearly schedule. Customers may only request a change from or to BPA-provided Operating Reserves prior to the 1st of April before the beginning of a rate period.

The new provider start dates coincide with the start of the next rate period, typically October 1st. Customers may contact their Account Executive for further clarity on dates if needed.

- In Section E (1) of the Business Practice, BPA references “real-time adjustments from WPP RSG.” Snohomish recommends that these real-time adjustments have more definition within the Business Practice to help customers understand and anticipate when such adjustments may occur based on system conditions.

BPA Response 5

The Western Power Pool Global and Zonal adjustments are defined by Western Power Pool Reserve Sharing Program Documentation available at www.WesternPowerPool.Org. Click on “Documents” at the top, select “RSGC” under the “WORKGROUP” drop-down on the right to sort, and select “Reserve Sharing Program Documentation.”

BPA would like to thank Snohomish PUD for their engagement in the business practice process and their comments on this business practice.

B. Bonneville Power Administration – Modification

Bonneville has modified the business practice to reflect the Western Power Pool Reserve Sharing Group decision (8/20/2026) to adopt a 105-minute recovery standard, replacing the previous 60-minute recovery time.

The new 105-minute recovery standard will take effect September 1, 2026. As a result, Bonneville must implement this change immediately to ensure that its practices are aligned with the Western Power Pool Reserve Sharing Group. To provide the opportunity to comment, BPA is proposing these changes under Category C of Bonneville’s Business Practice Process.

BPA Actions

Section F.2 is updated as follows:

2. The reserve deployment must be fully delivered within 10 minutes after BPA sends a signal for Operating Reserves; and sustained for up to ~~60~~ 105 minutes unless otherwise requested by BPA.

Section G.2 is updated as follows:

2. BPA will send a signal and status verification flag to the self-supplying Provider’s Operating Reserve resource for up to ~~65~~ 110 minutes. This signal is zero and a status

verification flag is not set when there is no contingency reserve event and no testing. The self-supplying Provider's Operating Reserve resource will use the signal to deliver Operating Reserves as follows:

Section I.2.f is removed:

~~f. How long the reserves are required (up to 60 minutes).~~

Section I.3 is updated as follows:

3. A plant operator requesting reserves for a contingency will receive reserves from BPA for ~~60~~ 105 minutes with the amount received ramping to zero from ~~55~~ 100 to ~~60~~ 105 minutes following the request

Section J.4 is updated as follows:

4. Settlement covers contingency energy delivered for ~~60~~ 105 minutes.