

# **Response to Comments – Southern Intertie Study Process**

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## **BPA Transmission Business Practice**

Version 2

Posted 11/6/2024

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## Version 2

This document contains comments and BPA responses regarding Version 2 of the Southern Intertie Study Process Business Practice posted for comment from September 20, 2024, to October 15, 2024.

This is Bonneville’s final agency action in regard to this version of the business practice.

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

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## A. Seattle City Light

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Seattle City Light (City Light) appreciates BPA's efforts to actively engage with customers regarding business practice changes.

### **Overview Comments**

City Light, as a percentage Owner of the NWACI capacity, recommends BPA include studying the impact of LTF TSRs that parallel all or part of NWACI on existing transmission rights. This includes impacts on the NWACI ownership capacity and ability to use that capacity. In this context, any TSR on or in parallel with NWACI capacity should be studied with the impacts and necessary mitigation projects identified to maintain the full use of existing transmission rights.

City Light suggests the following language change to section A.2.

A.2. Studies to increase capacity or evaluate the impact of parallel TSRs on the Southern Intertie are performed at either NWACI capacity owner's discretion or upon Customer Request.

### **BPA Response 1**

Bonneville would like to thank City Light for their engagement and comments. Bonneville would not perform a study without the participation of the impacted capacity or facility owners (NWACI or PDCI) as indicated in Section A.3.d.ii of the business practice.

Bonneville is choosing not to adopt the language modifications suggested for Section A.2 of the business practice.

Bonneville's ability to initiate a study was established during TC-22 proceedings regarding the Southern Intertie study process and the edits City Light proposes for Section A.2 would preclude Bonneville from initiating a study. Per Section A.3.d.ii of the business practice, "Transmission Provider(s) at both ends of the intertie and any impacted capacity owners and facility owners must agree to participate in the WECC study process." Bonneville believes the requirement in Section A.3.d.ii addresses City Light's concern.

This business practice is intended to address requests for service on BPA's Southern Intertie. This business practice does not address how adjacent or parallel systems would handle requests for service under their tariff.

### **Customer Requested Study Process Comments**

City Light recommends the following wording to address notification of NWACI owners and other coordination issues.

B.3.a. Post a notice on OASIS that a study request has been submitted and a Cluster Study on the Southern Intertie may be performed; and  
B.3.b. Email a notice to all NWACI contractual owners; and  
B.3.c. Tender a study agreement to the Customer requesting a study (requesting Customer) within 30 Business Days. This Study agreement will define the requesting Customer's obligations to perform third party coordination with all impacted Transmission Providers and capacity or facility owners.

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**BPA Response 2**

As described in Section B.3.a of the business practice, when a party other than Bonneville initiates a study request to increase capacity, Bonneville will post a notice on OASIS. This notice is available to all potential study participants including NWACI and capacity or facility owners.

As described in Section B.3.b of the business practice, when a party other than Bonneville requests a study, the requestor is responsible to complete third party coordination as outlined in the requestor's study agreement. Coordination with impacted capacity or facility owners (NWACI or PDCI) as a third party is included in that agreement.

Bonneville is choosing not to modify the study process to issue a separate email notification to impacted capacity or facility owners (NWACI or PDCI) in addition to the OASIS notice.

**BPA Initiated Study Process**

City Light recommends the following wording to address notification of NWACI owners and other coordination issues.

C.1. If a study (described above) will be performed at BPA's discretion, BPA will notify NWACI and PDCI capacity or facility owners, post a notice on OASIS, and tender a study agreement to Customers with LTF TSRs in STUDY status impacting ~~the applicable portion of the~~ Southern Intertie (NWACI or PDCI).

City Light thanks BPA for consideration of these comments.

**BPA Response 3**

Bonneville is choosing not to modify the study process described in Section C.1 to issue a separate email notification to impacted capacity or facility owners (NWACI or PDCI) in addition to the OASIS notice. The OASIS notice is available to all potential study participants including NWACI and PDCI capacity or facility owners.

Following the OASIS notice, BPA would reach out to required entities as described in the business practice to request their agreement to participate in the study.

Bonneville is choosing to retain the verbiage, "the applicable portion of" in Section C.1 of the business practice to ensure clarity that a study is unlikely to impact both NWACI and PDCI.