

Simultaneous Submission Window Processing

BPA Transmission Business Practice

Version 3

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In Order No. 890, FERC required Transmission Providers that establish “no earlier than” time frames for submitting firm PTP Transmission Service Requests (TSRs) to treat those TSRs received within a specified time period at the beginning of the time frame as having been received simultaneously. BPA has adopted “no earlier than” time frames for its Short-Term Firm transmission service products and, as described herein, has developed and implemented a simultaneous submission window for these products.

BPA Policy Reference

- [Open Access Transmission Tariff \(OATT\)](#): Section 13.2

For more information, visit the [BPA Transmission Business Practices webpage](#) or submit questions to techforum@bpa.gov.

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A. Simultaneous Submission Window Application

1. A simultaneous submission window will apply to Original and Redirect TSRs for the following types of Firm transmission service:
 - a. F-Hourly PTP
 - b. STF-Daily PTP
 - c. STF-Weekly PTP
 - d. STF-Monthly PTP
 - e. F-Daily Loss Returns
 - f. F-Hourly Loss Returns
2. A simultaneous submission window will not apply to TSRs for Long-Term Firm transmission service, Network Integration (NT) Transmission Service, or Non-Firm transmission service.
 - a. Reservation priority of NT TSRs will be honored through the Short-Term Preemption and ROFR process.
3. A simultaneous submission window will also not apply to Consolidation, Deferral, Resale, Recall, Relinquish and Renewal TSRs.
4. BPA will treat eligible Firm TSRs with otherwise equal reservation priority (priority based on service duration, Preconfirmed status, and bid price under Section 13.2 of the BPA OATT) and received within the first five (5) minutes of the reservation time frame opening as having the same queue time. BPA will use a lottery methodology to allocate available capacity among TSRs with otherwise equal reservation priority submitted within this simultaneous submission window.
5. TSRs submitted outside of the simultaneous submission window will be processed based on queue time, first-come first-served basis, as set forth in Section 13.2 of the BPA OATT.
6. For applicable markets, the Short-Term Preemption and ROFR process will be in effect from the opening of the reservation window, including the first five (5) minutes.

B. Capacity Allocation for Eligible TSRs Submitted Within Window

1. For eligible TSRs submitted within the five (5) minute reservation window, BPA will allocate available capacity pursuant to Section 13.2(ii) of the BPA OATT using the following priorities:
 - a. Service duration (Longer duration TSRs receive priority over shorter duration TSRs).
 - b. Preconfirmed status (Preconfirmed TSRs receive priority over non-Preconfirmed TSRs of equal duration).
 - c. Bid price (Higher bid price TSRs receive priority over lower bid price TSRs. This applies only if BPA offers discounts on transmission service under the BPA OATT).
 - d. Lottery allocation (Explained further in Section D.)

C. Simultaneous Submission Window Duration & Treatment of TSRs Received Within Window

1. The simultaneous submission window opens at the beginning of the reservation window for the types of eligible Firm transmission service identified in Section A and closes five (5) minutes thereafter, as set forth in the following table:

Firm Product	Simultaneous Window Opens	Simultaneous Window Closes	For Service Starting In
Monthly PTP	00:00	00:05	365 days
Weekly PTP	00:00	00:05	14 days
Daily PTP (including Daily and Hourly Loss Returns)	00:00	00:05	7 days
Hourly PTP	09:00	09:05	WECC Pre-schedule day

2. All applicable TSRs submitted within a simultaneous submission window are masked on OASIS until the window closes.
3. TSRs submitted within the simultaneous submission window that are eligible for the lottery allocation will be processed upon the closure of the window. The effective queue time for awarding capacity under the lottery allocation will be the close of the window (XX:05).

D. Lottery Allocation Methodology

1. For TSRs submitted within the simultaneous submission window, if, after prioritizing by duration; Preconfirmed status; and bid price, there are multiple Customers with TSRs equal in priority, BPA will allocate available capacity based on a random lottery in the following manner:
 - a. BPA will identify all Customers that have TSRs with equal priority.
 - b. Based on the total number of Customers identified, BPA will randomly assign a pick order to each Customer. For example, if there are five different Customers with TSRs of equal priority, each Customer will be randomly assigned a pick order number from 1 to 5. That same pick order number will be used for all successive lottery rounds.
 - c. BPA will run successive lotteries in which each Customer can have one (1) TSR considered per round until all eligible TSR's are processed.
 - d. BPA will select Customers in the randomly assigned order and offer available capacity to the first (next) of the selected Customer's TSRs (based on the AREF number).
 - e. BPA will make a full offer depending on the capacity available based on the Customer's POR/POD or Source/Sink combination.

- f. If there is not sufficient capacity available to make a full offer, BPA will initiate the Short-Term Preemption and ROFR process pursuant to Section 13.2 of the BPA OATT and its business practices.
- g. Once the Short-Term Preemption or ROFR process is complete, BPA will make an offer (full or counter-offer) of available capacity.
- h. If there is no available capacity, BPA will set the TSR status to REFUSED.
- i. If one Customer submits multiple short-term TSRs with equal priority and no other Customer submits TSRs within the simultaneous submission window, the lottery allocation methodology will result in offering available capacity in order of AREF number.