

Short-term Preemption and ROFR Project Update

CBPI

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Objectives

- Communicate plans for the implementation of Preemption and ROFR per the TC-24 tariff.
- Culmination of the process that began under the TC-20 proceeding.

Scope

In Scope:

- Implement Business Practice “Preemption of Short-term Transmission Service” version 6.
 - Supersedes version 5.
- Implement Preemption and ROFR for Hourly Firm PTP and NT and Hourly Non-firm PTP (2-NH).
- Implement the Conditional Reservation Deadline for Hourly Firm PTP per the TC-24 tariff.
- Change the Conditional Reservation Deadline for Daily Firm per the TC-24 tariff.

Out of Scope:

- Secondary Network service (6-NN) and Secondary Non-firm PTP Redirects (1-NS) are excluded from Preemption and ROFR.

TC-24 Change to the CRD for Hourly Firm

The Conditional Reservation Deadline (CRD) is defined in section 13.2 of the BPA OATT. It defines the point in time when a reservation is no longer subject to Preemption and ROFR (*i.e.*, becomes “unconditional”).

- The CRD drives all of the PCM timing for a given service.
- The CRD for Hourly Firm service was changed as follows as part of the TC-24 proceeding. ROD issued on 02/09/23.

Tariff	Effective Date	Conditional Reservation Deadline for Hourly Firm
Current	Oct 1, 2021	2pm of the WECC Preschedule Day
TC-24	Oct 1, 2023	12pm of the WECC Preschedule Day

TC-24 Change to the CRD for Daily Firm

- The CRD for Daily Firm service was also changed as follows as part of the TC-24 proceeding.
- This change was made to eliminate a small gap from *pro forma*.

Tariff	Effective Date	Conditional Reservation Deadline for Hourly Firm
Current	Oct 1, 2021	1am of the WECC Preschedule Day
TC-24	Oct 1, 2023	Midnight of the WECC Preschedule Day

Timeline and Phased Implementation

- Aug 24: BP v6 posted as final.
- Sep 13: Final PCM training session held.
- Oct 1: TC-24 tariff effective
- Oct 4: BP v6 effective date.
- Oct 4: Start a phased implementation.
 - Oct 4: Enable Hourly Firm NT vs Hourly Firm PTP
 - ❖ Lowest volume and risk.
 - Oct 24: Enable Hourly Firm PTP vs Hourly Firm PTP
 - ❖ First ROFR activity in the Hourly market.
 - Nov 14: Hourly Non-firm PTP vs Hourly Non-firm PTP
 - ❖ Highest volume and tightest timeframes. Only applies to 1:1 paths since ATC is still unlimited on flow-based paths.

Changes on Oct 4 at 9am PPT

1. Set the Unconditional Time (CRD) for F-HOURLY PTP service to be noon of the WECC Preschedule Day.
 - Currently, Hourly Firm PTP is configured to go unconditional immediately upon confirmation.
 - The change will take effect for new Hourly Firm PTP requests as they are set to CONFIRMED starting at 9am on 10/04/23.

2. Change the Unconditional Time (CRD) for STF-DAILY PTP service from 1am to midnight of the WECC Preschedule Day.
 - The change will take effect for new Daily Firm PTP requests as they are set to CONFIRMED starting at 9am on 10/04/23.

3. Enable PCM for Hourly Firm NT Challengers against Hourly Firm PTP Defenders.
 - The change will take effect for new Hourly Firm requests queued at 9am on 10/04/23.

Summary of Hourly PCM Considerations

- Hourly Firm PTP can only be challenged by another Hourly Firm (NT or PTP). 2-NH can only challenge 2-NH.
- A noon CRD for Hourly Firm means:
 - PTP must challenge by 11am of the WECC Preschedule day.
 - NT can challenge up until 11:30am of the WECC Preschedule day.
- Hourly profiles allowed, including leading/trailing zeros.
 - However, TSR must have a flat profile in order to be a Challenger.
 - A profiled PTP reservation can still be a Defender based on the total duration between start and stop times (irrespective of zeros).
- ROFR timelines are tight:
 - Hourly Firm is 30 minutes to exercise ROFR.
 - Hourly Non-firm is 10 minutes when queued less than 8 hours from start time; 30 minutes otherwise.

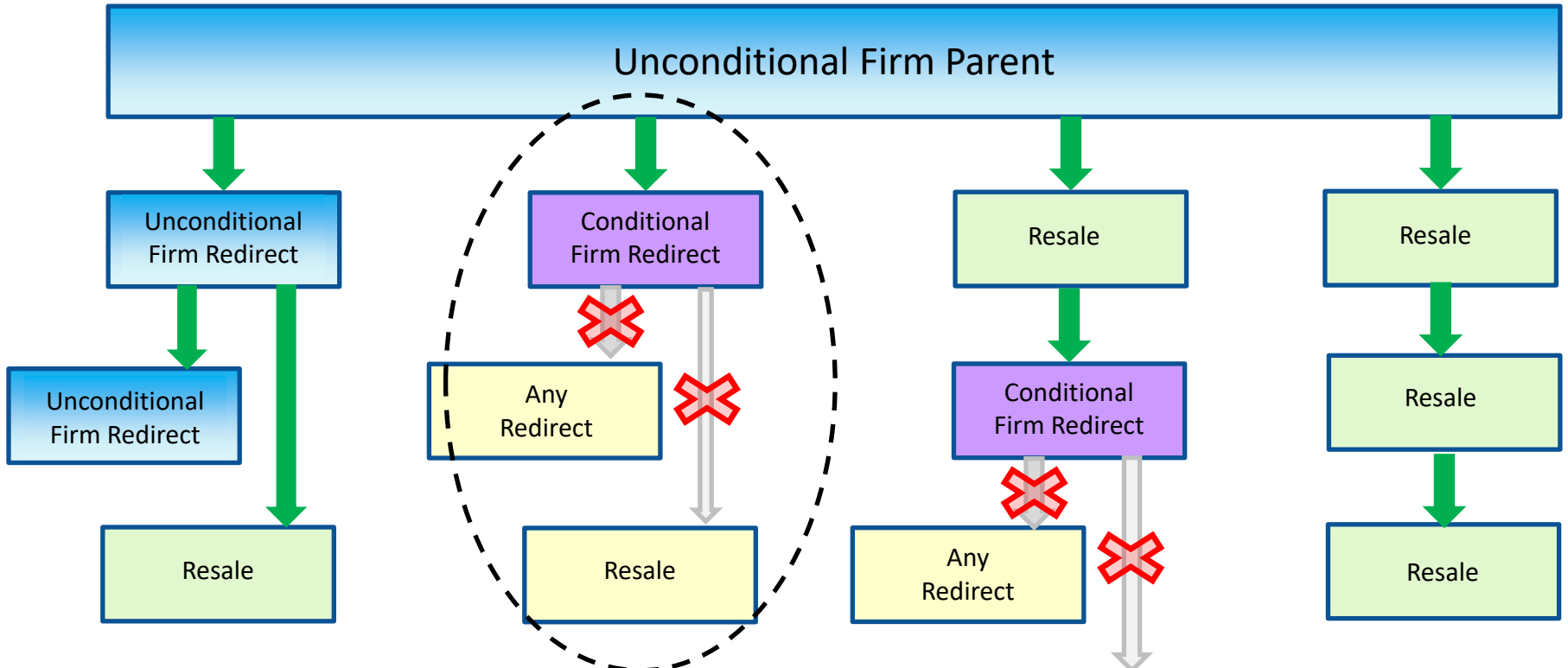
Other Considerations of a Noon CRD

The conditional reservation deadline is primarily used in the Preemption and ROFR process.

However, this will be the first time that any CRD for Hourly Firm will be enforced for the following:

- Consolidation: Hourly Firm PTP will not be able to be consolidated (aggregated with 'like' service) until 12pm.
- Redirects: Conditional Redirects from unconditional parents will be prevented from further Redirects and Resales until this 12pm deadline is reached. (See Redirects BP A.4 to 6)

Redirects / Resales from Unconditional Parents



An Unconditional Redirect works the same as any Unconditional parent: Resales and Redirects allowed.

This is the basic *Dynegy* situation: Resales and Redirects are blocked from Conditional Redirects when they come from an Unconditional parent.

The same is true if one or more Resales are in between the Conditional Redirect and the Unconditional parent.

There is no change to Resales from Resales.

PCM Resources

- Preemption BP on the BP [website](#).
- Supplemental reference and training material on the Customer Training [website](#).
 - PCM training videos
 - Preemption and ROFR User Guide
 - Preemption and ROFR Flow Diagram