



## **Summary of Comments Received on Proposed 8/17/16 Updates to Western Area Power Administration's (WAPA) TSR Annulment Business Practice and WAPA Responses**

Western Area Power Administration (WAPA) received numerous comments from transmission customers regarding the proposed 8/17/16 business practice updates. The comments received ranged from concerns regarding time lines to the impacts of time zones of reservations. The comments are summarized below, with WAPA's responses, if any, noted. Based upon the comments, WAPA agrees to incorporate additional proposed updates to address certain of the comments received as described below and as set forth in the proposed 11/28/16 updated version of the BP.

WAPA received a number of comments regarding the timing requirements in the BP, even though the previously proposed 8/17/16 updates didn't recommend any changes to the timing requirements in the currently effective BP. In general the comments suggested timing requirements for replacements be extended. The comments received had a wide range of time lines from extending the next hour deadline to 30 minutes to ignoring all time lines and handling items on case by case basis. One of the comments received recommended a no later than clause of "30 minutes before the start time of the TSR." There was also a recommendation to add another time frame to the BP.

WAPA agrees with certain commenters that the timing requirements may have been too restrictive in certain instances. Customers will find the timing requirements have been extended in most instances in the newly proposed 11/28/16 version of the BP. These extended timing requirements should allow for enough time for customers to notify WAPA of incorrect transmission service requests. The timing requirements have been increased to 30 minutes for next hour increase, 2 hours for the time period between 2 hours and 4 days out, and finally 3 days for requests starting after the 5<sup>th</sup> day in the cases where replacement TSRs are required. WAPA also has included provisions for notification within 10 minutes of the Queued Time of an inadvertent error by the customer, and in such instances WAPA proposed to annul the TSR without the need for a replacement request.

The customer suggestion to include a 4<sup>th</sup> time period into the business practice was declined. WAPA found there to be too many unique situations, such as "Special" Pre-Schedule calendar days that would have created confusion to both the TP and TC. To simplify and provide clear understanding in the proposed business practice WAPA will limit the time frames to three tiers in the cases where replacement TSRs are required.



WAPA disagreed with the commenter(s) that recommended the elimination of all timing requirements. In reviewing this request WAPA found removal of the timing requirements may lead to accidental discriminatory behavior towards customers. WAPA also wanted to maintain clear guidance in the BP for WAPA personnel handling annulment requests.

Another comment received was to recognize the impacts of path derates (i.e. changes to path ratings that impact posted ATCs) and to include the term derate along with outage in the document. WAPA reviewed this comment and agreed with the commenter(s). There are going to be instances when a derate, not a full outage will impact a transmission reservation. Additional proposed language is included in the updated 11/28/16 version of the BP to address the derate issue.

A comment was received that requested WAPA contact the customer via telephone when a TSR is annulled. While WAPA agrees that this recommendation would provide additional notification than the automatic OATI OASIS provides, it may quite difficult in certain circumstances. Many annulments are performed by real-time dispatch personnel, and given their workload they may not be able to contact and notify TCs in a timely or consistent manner. The OATI OASIS does have functionality that permits customers to be notified when their TSR is updated. Due to the automatic OASIS notification and the possibility of WAPA not being able to consistently notify all impacted customers for every situation WAPA cannot implement this request.

One commenter also suggested WAPA evaluate all annulments on a case by case basis. This option was reviewed. This option may create scenarios that may be viewed as discriminatory and create inconsistency in the implementation of annulments. WAPA cannot implement this request in the business practice.

Another commenter suggested WAPA implement a Pacific Prevailing Time approach for marketing transmission. The comment submitted isn't applicable to this TSR annulment BP; however, it will be evaluated by the Phoenix office as a possibility.