The Bonneville Power Administration response to WEQ Annual Plan Items 1.e/R14002 – Develop, modifies, or deletes business practice standards to support Request R14002 (NERC Project 2012-05 ATC Revisions (MOD A))is as follows:

Thank you for the opportunity to comment on the Draft Recommendation to the NAESB Executive Committee for WEQ Annual Plan Item 1.e/R14002.  The Bonneville Power Administration is responsible for operating and maintaining approximately seventy five percent of the high-voltage transmission in our service territory.  We work with 490 transmission customers to facilitate the service of over 13,000,000 people in the Pacific Northwest.

BPA is supportive of the updated Draft Recommendation to the NAESB EC regarding 2015 WEQ Annual Plan Item 1e.R14002.  The NAESB BPS committee worked closely to clarify and streamline the requirements regarding ATC calculations for the three methodologies.

BPA is not supportive of requirement XXX-1.4 and XXX-1.4.1, which are new requirements that were not carried over from the existing NERC MOD standards.  The two new requirements are not related to the calculation of ATC, but are intended to limit sales and schedules with the hopes of reducing loop flow issues.  While BPA does support exploring this equity issue between entities, BPA does not believe it is appropriate to include this issue in ATC calculation business practice standards.  BPA believes that loop flow is a large enough topic to warrant its own standards request.