**Summary of Questions for NTS rollover**:

Eligibility for rollover rights:

* NAESB does not define the eligibility criteria for PTP in the standards(e.g., 5 year term).
* Do rollover rights apply to a NITS Application? Yes
* Do we want to define the eligibility criteria for Application rollover rights in the standards (e.g., 5 year term)?
* Do DNR’s have rollover rights distinct from the NITS Application?
	+ Does the concept of rollover rights ever apply to any DNR?
	+ Is the term “rollover rights” the correct term to apply to such rights?
	+ Are the rollover rights on the DNR separate and distinct from those on the Application?
	+ What is the relationship between rollover rights for an Application and those for a DNR?
* If so, what makes a DNR eligible for rollover rights? For example:
	+ Do all approved DNR’s under a NITS Application with rollover automatically have rollover?
	+ Should the DNR meet a minimum term requirement to be eligible for rollover rights?
	+ If there is a minimum term requirement, shall that be a standard term across the industry?
	+ Other there other eligibility criteria that should be considered?
	+ Do we want to define any of the eligibility criteria for DNR rollover rights in the standards? Alternately, we can require the TP to define the eligibility criteria in their BP?
* How does the TP even know which DNR’s shall be studied for rollover rights?
	+ Should all DNR’s submitted under a NITS Application with rollover automatically be studied for rollover?
	+ Should all DNR’s submitted with a minimum term under a NITS Application with rollover automatically be studied for rollover?
	+ Should the DNR request have to include information documenting that customer is requesting rollover rights?
		- Is a Resource Forecast sufficient information for assuming the TP shall study a given DNR for rollover?
		- What if a DNR is submitted that was not previously included in a Resource Forecast?

Deadline for exercising rights:

* NAESB manages a deadline for exercising PTP rollover rights, but does not define what that deadline is (e.g., 1 year deadline).
* Is there a deadline for exercising Application rollover rights that needs to be managed in OASIS?
	+ Does that deadline need to be defined in the standards?
* Is there a deadline for exercising DNR rollover rights that needs to be managed in OASIS?
	+ Does that deadline need to be defined in the standards?
* What notifications shall there be for the deadlines for rollover rights for the Application, DNR, or both?

How to exercise rights:

* PTP has an established request type (Renewal) for exercising rollover rights and standards for when to do so.
* Is there a need for a mechanism for exercising Application rollover rights?
* How does a customer denote that they are exercising rollover rights for a DNR?
	+ Is the DNR Extension the appropriate mechanism for exercising DNR rollover rights?  Is that existing mechanism sufficient?
* What if the DNR is for a new resource representing customer’s option to change suppliers but using existing rollover rights?
	+ What may need to change in the DNR Extension to provide this flexibility?

Management of rollover rights:

* Is there a need to manage a concept of unexercised rollover rights at the Application level?
* How do you manage unexercised rollover rights at the DNR level (enforce limits to not exceed rights, reduce rights when exercised, etc)?
* In what way (if any) are rollover rights impacted by temporary terminations of a DNR?
	+ In what way (if any) are rollover rights impacted by concomitant requests?
* In what way (if any) are rollover rights impacted by indefinite terminations of a DNR?
* What happens if the deadline (if any) passes for rollover of the Application?
* What happens if the deadline (if any) passes for rollover of the DNR?
	+ Do unexercised DNR rollover rights get set to zero once a deadline passes?

Posting of rights:

* NAESB is explicit on what is posted on OASIS for PTP rollover rights (basically the deadline and the unexercised rights over time).
* If DNRs are granted rollover rights, is there a need to post information regarding the rights granted similar to PTP?     This should be outside the scope of the DNR Request itself possibly through a DNR Rollover List type template.
* What (if anything) shall be posted on OASIS for rollover rights for an Application? Renewal Due Time and Rollover Eligibility
* What (if anything) shall be posted on OASIS for rollover rights for a DNR?
* What template changes are needed for posting, querying, and exercising rollover rights for the Application?
* What template changes are needed for posting, querying, and exercising rollover rights for the DNR?

Management of transmission capacity for unexercised rights:

* NAESB does not have standards for how transmission capacity is managed or encumbered for unexercised PTP rollover rights.
* Is there a need to provide an OASIS mechanism for doing so for NITS?
	+ How might this be related to Scheduling Rights?
	+ How might this be related to Resource Forecasts?
* Should there be a capability to request Scheduling Rights separately and apart from the DNR request?

The following are questions from previous scoping documents

**Current PTP Rollover in WEQ-001-20**:

* Requires posting of information about rollover to OASIS
* Sets a deadline. Does not say what the deadline is.
* Must exercise prior deadline by submitting a renewal request.
* Renewal request cannot exceed unexercised rollover rights.
* Reduce unexercised rights upon confirmation of renewal.
* Set unexercised rights to zero once deadline passes.
* Does not discuss eligibility criteria.

**From BPA NAESB Request (R18004):**

* Clarify when and how Rollover Rights shall apply and be exercised based on transmission service associated to a DNR and if/when Rollover Rights shall be applied based on the NITS Application.
* Clarify eligibility for Rollover Rights based on term of the DNR and/or the term of the NITS Application.
* Clarify what attributes may change during rollover of transmission service associated with a DNR and what attributes must remain the same.  For example, a Customer is permitted to change its power supplier as long as power flows do not change.
* Clarify that Rollover Rights are not impacted based on temporary terminations of a DNR.
* Clarify how Rollover Rights are impacted based on indefinite terminations of a DNR.
* Clarify posting requirements for granting of Rollover Rights for NITS.
* Clarify any deadline for exercising Rollover Rights, including when a difference exists between the term of the NITS Application and the term of the DNR.
* Clarify any notifications related to the deadline for exercising of Rollover Rights.
* Clarify the process for exercising of Rollover Rights.
* Clarify treatment of Rollover Rights that are not exercised by the deadline.
* Establish templates for posting, querying, and exercising Rollover Rights for NITS.

**From Paul’s March presentation on possible NITS scope**:

* Should WEQ-001 be updated to identify if/when DNRs are eligible for rollover rights?
* What are the attributes of a DNR having rollover rights?
	+ Any DNR approved under a NITS Application that has rollover?
	+ Only Resources designated for 5 years or longer?  Must grant?
	+ Customer requests rollover associated with a DNR?  May grant?
* What are the mechanics for exercising rollover rights?
* If DNRs are granted rollover rights, is there a need to post information regarding the rights granted similar to PTP?
	+ This should be outside the scope of the DNR Request itself possibly through a DNR Rollover List type template.

**From Paul’s later scoping document on NITS rollover**:

Possible conclusions from FERC guidance on NITS rollover:

* An initial set of rollover rights must be identified and planned for at the time of execution of the network service agreement.   Assume this would be based on the initial set of DNRs supplied in the application and assumed to be on-going through the initial term of service unless otherwise known.
* Clearly the NITS Application has a rollover provision that is distinct from any rollover rights for a specific DNR.
* Any rollover rights associated to a DNR must only be loosely tied to that DNR to accommodate the customer changing power suppliers assuming these would be associated with addition of new NITS resources.
* If a DNR has rollover rights, the DNR itself may be for less than five years in duration since the attestation could only cover the term of the power contract and the term of the power contract does not appear to be key determinant of whether the customer has rollover rights or not.

NITS rollover questions to be answered:

* Is there a need to post on OASIS on-going rollover rights associated with the NITS Application similar to the ***rollover*** template for PTP? 09/19/18 decided to set up a template structure for NITS Application similar to PTP and allow the TP to enter the data required to show rollover rights (renewal due time, start, stop, etc.).
* Do DNRs have rollover rights?
* How do DNRs acquire rollover rights?
	+ Minimum term requirement?
	+ Does DNR request have to include information documenting that customer is requesting rollover rights?
* Is there a need to post on OASIS information on rollover rights associated with a DNR?
* How does customer denote that they are exercising rollover rights for a DNR?
	+ What if DNR is for a new resource representing customers option to change suppliers but using existing rollover rights?

Scheduling Rights changes already proposed based on NITS implementation:

* Ease restriction on SR Source/POR and Sink/POD to not necessarily match the DNR and/or load service points, but should be associated with a scheduling path from resource to load.
* Allow SR capacity to be different (exceed) from DNR
* Add support for submission of SRs with termination requests.

Scheduling Rights questions to be answered:

* Should the posting of SRs be required – either by virtue of customer submission or TP allocation/assignment?
* Should there be a capability to request SRs separately and apart from the DNR request?
* Should there be a capability to request SRs with the AddNITSLoad requests?
* What other operational issues need to be addressed through the BPs or OASIS requirements for management of SRs?