**Summary of Questions for NITS Application rollover rights/extensions & DNR rollover rights**:

Eligibility for rollover rights/extensions:

* NAESB does not define the eligibility criteria for PTP in the standards(e.g., 5 year term).
* NITS Application
	+ Do rollover rights/extensions apply to a NITS Application? Yes
	+ Do we want to define the eligibility criteria for NITS Application rollover rights/extensions in the standards (e.g., 5 year term)? No let TPs determine by their Tariffs
* Do DNR’s have rollover rights distinct from the NITS Application? Yes
	+ Does the concept of rollover rights ever apply to any DNR? Yes
	+ Is the term “rollover rights” the correct term to apply to such rights? The term “rollover rights” may be better to keep so that the capacity of the PTP and DNR not be complicated.
	+ Are the rollover rights on the DNR separate and distinct from those on the NITS Application? Yes
	+ What is the relationship between rollover rights for an NITS Application and those for a DNR? The one relationship is that if NITS Application does not have rollover rights/extension rights then DNRs under the NITS Application will not have the ability for rollover.
* If so, what makes a DNR eligible for rollover rights? For example:
	+ Do we want to define any of the eligibility criteria for DNR rollover rights in the standards? Yes input a 5 year minimum term with the option to allow the TP to indicate shorter terms if defined in their BP and allow FERC give their opinion on this criteria.
		- Alternately, do we require the TP to define the eligibility criteria in their BP? See the first bullet in this section.
	+ Do all approved DNR’s under a NITS Application with rollover automatically have rollover? See the first bullet in this section
	+ Should the DNR meet a minimum term requirement to be eligible for rollover rights? See the first bullet in this section
	+ If there is a minimum term requirement, shall that be a standard term across the industry? See the first bullet in this section
	+ Are there other eligibility criteria that should be considered?
		- Can a DNR be eligible to be rolled over passed the resource stop time? yes, the DNR remains eligible but the effective stop time of the designated NITS resource must be modified prior to execution of those rollover rights per 002-101.3.3.8.
* 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? No not all
	+ Should all DNR’s submitted with a minimum term under a NITS Application with rollover automatically be studied for rollover? Yes unless using the opt out flag in next bullet point.
	+ Should the DNR request include information documenting that customer is requesting rollover rights? Yes have an opt out flag.
		- Is a Resource Forecast sufficient information for assuming the TP shall study a given DNR for rollover? N/A
		- What if a DNR is submitted that was not previously included in a Resource Forecast? N/A

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 NITS Application rollover rights/extensions that needs to be managed in OASIS?   Yes a data element will need to be added to manage the deadline and terms of the NITS Application.
	+ Does that deadline need to be defined in the standards? Yes input a notification term for 1 year notification and allow FERC give their opinion on this criteria
* Is there a deadline for exercising DNR rollover rights that needs to be managed in OASIS?   Yes input a notification term for 1 year notification and allow FERC give their opinion on this criteria
	+ Does that deadline need to be defined in the standards? Yes the subcommittee will address later
* What notifications shall there be for the deadlines for rollover rights/extensions for the NITS Application, DNR, or both?
	+ NITS Application - Yes will manage the deadline and the terms of the NITS Application using the new dynamic notification standards
	+ DNR - Yes will manage the deadline and the terms of the DNR using the new dynamic notification standards

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 NITS Application rollover rights/extensions?
	+ Yes (001-107 NITS – MODIFICATION OF NITS APPLICATION STOP\_TIME)
	+ There will be a need to establish a mechanism to manage the deadlines, terms, notifications.
		- Check for rollover rights (yes/no)
		- Documentation of the renewal deadline
		- Clarify that the request to modify the NITS Application STOP\_TIME is a request to exercise rollover rights
		- Update all rollover and notification data after the rollover rights have been exercised
* 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?  Yes
	+ Is that existing mechanism sufficient? No
		- Allow changes to the DNRs.
			* DNR capacity
			* Resource name
				+ Market Hub (source area and title area)
			* DNR profile information
			* Source
			* Scheduling rights profile information
			* Auxiliary transmission
			* Attestation
		- We do not intend to white list the items above
		- Add an mechanism for identifying what is being rolled over.
		- Consider if multiple extensions will be allowed
			* TBD
		- Required fields (rollover rights list)
			* Resource name
			* POR
			* Renewal deadline (indicates that you are eligible for rollover)
			* Effective start time
			* Application number
		- Optional fields
			* DNR profile
			* Scheduling rights profile
			* Effective stop time
			* Source
* 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? The existing DNR Extension is good for a starting point and changes may be needed based on the ability to change resources on the DNRs.

Management of rollover rights:

* Is there a need to manage a concept of rollover rights/extensions at the NITS Application level? Check for rollover rights (yes/no)
* How do you manage rollover rights at the DNR level (enforce limits to not exceed rights, reduce rights when exercised, etc)?
	+ Will we address ATC capacity? No
	+ Will we address DNR profiles? Yes since we are reflecting this value in the optional fields for the DNR and Scheduling rights profiles
* In what way (if any) are rollover rights impacted by temporary terminations of a DNR? They are not (Update 001-105.3.1.1, 105.3.1.2, 105.3.2.1.1, and 105.3.2.4.2 to allow temporary to go to the end of term)
	+ In what way (if any) are rollover rights impacted by concomitant requests? The rollover rights are impacted by the type of termination.
* In what way (if any) are rollover rights impacted by indefinite terminations of a DNR? The Transmission Customer has determined that they do not want to rollover.
* What happens if the deadline (if any) passes for rollover rights/extension of the NITS Application?
	+ The NITS Application will terminate at the end date and all stuff (Loads, Resources, DNRs, etc.) under the NITS Application will be set to terminate at the same time as the NITS Application. WEQ standards (001-107) already allow for this.
* What happens if the deadline (if any) passes for rollover rights of the DNR?
	+ Do unexercised DNR rollover rights get set to zero once a deadline passes? yes
		- A new extension request after the renewal deadline may be set to invalid.
		- Requires the TSP to update the posting of the rollover rights for the DNR.

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/extensions for an NITS Application? Renewal Due Time and Rollover Eligibility
* What (if anything) shall be posted on OASIS for rollover rights for a DNR?
	+ - Required fields (rollover rights list)
			* Resource name
			* POR
			* Renewal deadline (indicates that you are eligible for rollover)
			* Effective start time
			* Application number
			* DNR Capacity(rollover eligible capacity(PTP))
		- Optional fields
			* DNR profile
			* Scheduling rights profile
			* Effective stop time
			* Source
* What template changes are needed for posting, querying, and exercising rollover rights/extensions for the NITS Application? Yes there will be changes needed
	+ Do we want to provide notification for the NITS Application? Yes
* What template changes are needed for posting, querying, and exercising rollover rights for the DNR? Yes there will be changes needed

Management of transmission capacity for unexercised rights:

* NAESB does not have standards for how transmission capacity(ATC) is managed or encumbered for unexercised PTP rollover rights.
* Is there a need to provide an OASIS mechanism for doing so for NITS? We will not explicitly note in the OASIS standards but the structures are there so that an implementation can be done for the calculations for ATC.
	+ 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? Yes already in the standards per 2019 API 3c. We are not including it in the scheduling rights having rollover rights only the DNRs has rollover rights.

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?