

Conferring with customers on BPA's transmission tariff

And reciprocity status from FERC

Crews are extending a new transmission line through the heart of wind power country in eastern Oregon and Washington, thanks to an innovative new process called Network Open Season. The Bonneville Power Administration pioneered this approach to sift speculative placeholders from its clogged queue of new transmission requests and finance and build needed new transmission for wind farms and other generators.

Network Open Season works well for the Northwest. BPA appreciates the Federal Energy Regulatory Commission's approval of Network Open Season and FERC's praise for the process as a promising model to efficiently manage and study new requests for transmission service. As BPA continues to move forward with Network Open Season, however, questions remain about how the process can work routinely with the standard tariff FERC uses to ensure open access, non-discriminatory transmission service. For example, FERC's standard tariff includes timelines that differ from those of Network Open Season. BPA must determine whether it can integrate Network Open Season with FERC's standard processes in a way that preserves the benefits of Network Open Season for the agency and its customers.

As a government utility, BPA is not subject to the same FERC jurisdiction and standards applied to jurisdictional "public utilities" (essentially, investor-owned utilities) under the Federal Power Act. BPA voluntarily files its tariff with FERC to confirm that it substantially conforms or is superior to FERC's national model. This is called seeking "reciprocity" status.



The federal Bonneville Power Administration provides three-fourths of the high voltage transmission in the Pacific Northwest. BPA's transmission customers include consumer-owned and investor-owned utilities, independent power producers and power marketers across the Western United States, British Columbia and Alberta.

Voluntarily filing its tariff with FERC is one way for BPA to demonstrate its strong commitment to open access, non-discriminatory transmission service. But there are other ways as well, and attempting to conform to FERC's national model has created some difficulties for effective management of BPA's transmission system.

Some BPA customers assert that the agency's consistency with FERC's national model is important to their own business needs. Some want to ensure that FERC has an opportunity to override BPA's proposed changes to its tariff and that BPA makes changes to conform to the model tariff. Others suggest that reciprocity is necessary to assure that BPA maintains open access transmission.



When polled, BPA customers disagree on how high a priority the agency should put on seeking reciprocity, compared to other regional priorities such as developing new wind integration tools. Some customers have expressed concerns about the amount of staff time and money BPA must spend to fully comply with FERC's national model. BPA is also concerned about its ability to develop tariff terms and practices that work effectively for the region and that are consistent with the laws BPA administers.

BPA believes it needs an open, comprehensive dialogue with customers and stakeholders on a broad range of tariff issues before it decides whether to continue to seek reciprocity status. We seek to chart a course that will best:

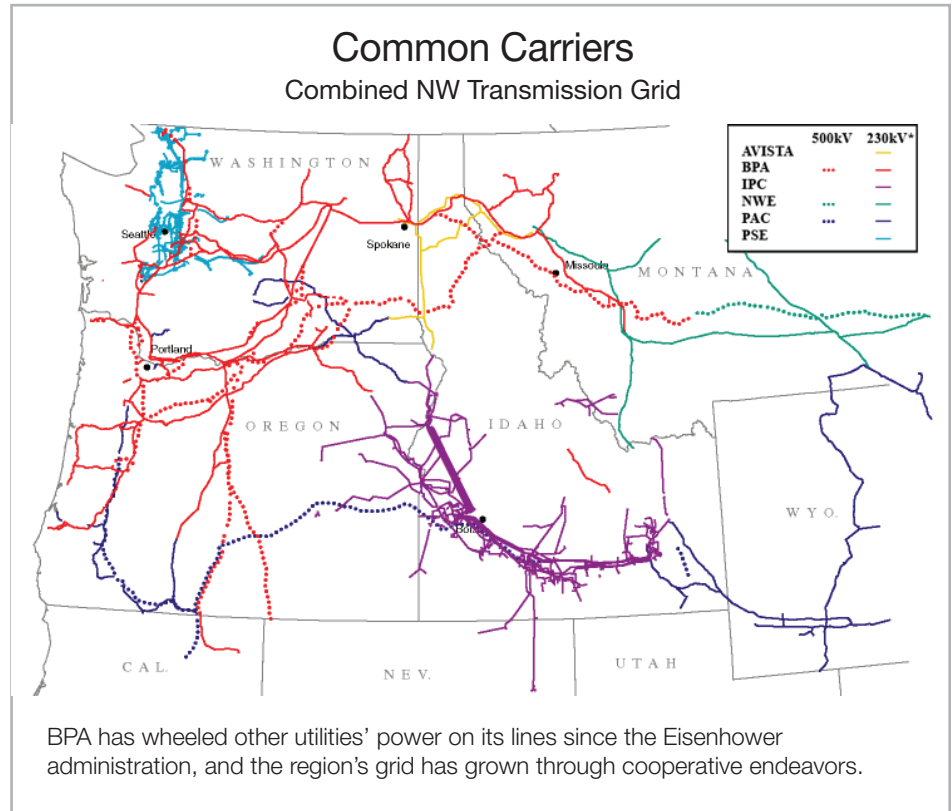
- Promote the long-term welfare of our region's economy and environment, given its unique environmental, transmission and power needs.
- Maintain open, non-discriminatory transmission access.
- Provide customers a high level of commercial certainty and predictability on the essential attributes of their transmission service.
- Maintain reciprocity status if that can be done reasonably and consistent with meeting the region's economic and environmental needs.
- Ensure continuing consistency with BPA's statutory obligations.
- Recognize the high value BPA places on its relationship with FERC.

WHAT IS RECIPROCITY?

Open access transmission was established in 1996 by the Federal Energy Regulatory Commission to provide uniform open, non-discriminatory access to transmission. FERC created a national tariff,* which is required of jurisdictional utilities and which includes the terms, conditions and descriptions of transmission services.

The tariffs of government and consumer-owned utilities are not subject to FERC tariff approval under the Federal Power Act standards applicable to FERC jurisdictional utilities. They may voluntarily file their tariffs with FERC to seek approval for purposes of reciprocity. This is the only purpose for which a non-jurisdictional utility may file its tariff with FERC for approval under standards similar to those applicable to jurisdictional utilities. The jurisdictional utilities must give non-jurisdictional utilities with reciprocity status the same terms and

* Known formally as FERC's *pro forma* tariff.



conditions for use of their transmission lines that they give one another.

If FERC does not take any action on an investor-owned utility's tariff filing in 60 days, it is automatically approved. But there is no schedule for review of non-jurisdictional utilities' voluntary filings, and response can take a year or more.

How we got here

BPA voluntarily filed its open access tariff with FERC in 1996 and has consistently filed tariff revisions since. BPA's tariff has always varied in places from FERC's standard model, due to BPA's central role in the Northwest's hydroelectric system and terms of the agency's authorizing legislation. BPA strives to achieve as much consistency with FERC's tariff as possible, while adhering to duties Congress assigned specifically to BPA.

Although FERC did not approve every element in BPA's filings, in each case between 1996 and 2007, BPA conformed to FERC's rulings and maintained reciprocity status.

In 2007, FERC issued a revised tariff as part of its Order 890. It directed all jurisdictional utilities to refile their tariffs and invited non-jurisdictional utilities to do so. BPA worked with its customers and FERC to respond, culminating in a BPA tariff filing in 2008. In 2009, FERC denied BPA reciprocity unless BPA made certain changes to its tariff.

As with earlier filings, this new BPA tariff contained differences from the FERC national tariff. Many of the differences responded to BPA customer requests; others reflected BPA needs. While FERC approved changes BPA made to the standard tariff – deviations – it refused BPA's request to omit several provisions of the standard tariff. BPA sought rehearing and said it might ask FERC to conduct a conference. In January 2011, BPA submitted a filing asking FERC to rule on BPA's tariff without a conference.

BPA did not request a conference with FERC because BPA has identified a number of broader

issues. To fully assess the impact of continuing to pursue reciprocity status, BPA conducted a comprehensive analysis of potential differences between FERC's standard tariff and the agency's tariff, practices and potential needs. The results suggest new areas where BPA's tariff may need revision to fully reflect its current practices, follow emerging FERC direction, fulfill BPA's direction from Congress and advance regional priorities. BPA has operated since 2007 without reciprocity status, with no significant consequences.

Differences delineated

BPA has gone through an extensive internal process to identify differences with the FERC tariff. These differences have been placed in three categories:

- 1) Issues that can be remedied within one year.
- 2) Issues for which it will take more than one year to implement fixes.
- 3) Differences in policy where BPA questions whether it is worth the effort and expense to comply with the tariff.

A list of all identified issues is found on page 12. The following sections discuss issues FERC raised on BPA's 2008 tariff filing and some newly emerged concerns.

OUTSTANDING ISSUES

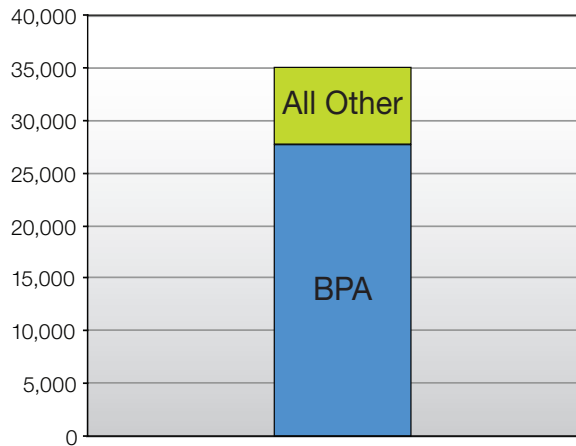
FERC raised several issues in its response to BPA's 2008 Order 890 filing, including requiring several new services. Here are issues FERC has raised:

Financial middleman for transmission resales: Buyers and sellers in the resale market for transmission on BPA's system currently settle financial transactions among themselves, a process that has worked effectively for many years and appears to satisfy their needs. The market for resales on BPA's system is thriving. More than 75 percent of all transmission resales nationwide from April 2007 to December 2009 took place on BPA's system.

Massive transmission resale market

U.S. Transmission Resales Reported to FERC

(April 2007 — December 2009)



Most transmission resales in the U.S. occur on BPA's system.

FERC's current tariff would require BPA to take on the role of a financial middleman for each resale transaction, receiving funds and making payments on behalf of buyers and sellers. This could encompass 2,000 to 3,500 resale transactions a month, many involving multiple layers of resales among multiple parties. Serving as a middleman in this situation could be a complex and costly new role for BPA, which hosts many more transmission resale transactions than all other utilities combined. In addition, FERC asserted that buyers and sellers cannot be charged a fee for this service. BPA believes that customers who use this service should pay for its costs.

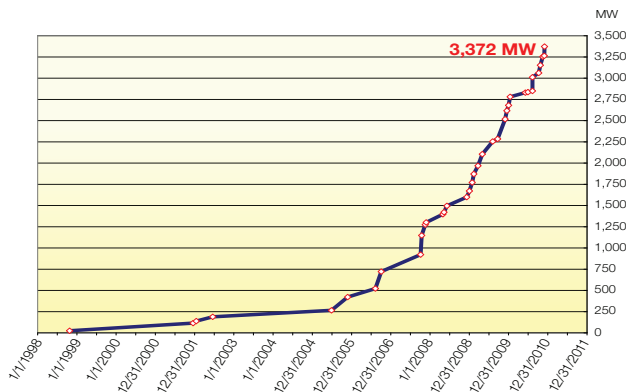
Generation imbalance services: Generation imbalance services maintain system reliability by balancing differences between actual and scheduled generation. These services are especially important for variable energy resources such as wind. BPA has offered generation imbalance services to all generation resources in the BPA balancing authority area since 2002. In Order 890, FERC required transmission providers to offer generation imbalance service to all generators located in their balancing authority areas as part of their tariff services.

BPA's tariff on this subject is under development. It may differ from FERC's version to make BPA's generation imbalance service consistent with any related BPA rate case decisions and to protect BPA ratepayers from becoming responsible for paying stranded costs, for example, costs of resources acquired to balance generators that then choose not to use those services.

BPA believes its rates should assure that the costs of these services are borne by those who use them. BPA also believes that the limits of what we will provide should be set through our rate-making and contracting processes to keep those costs reasonable. We recognize that FERC's view of this issue is evolving as well, and our differences, if any, may turn out to be modest. But for now, our assessment is based on differences that exist in adopted FERC policy.

Wind power is booming

Wind Generation Capacity in the BPA Balancing Authority Area



BPA innovations* have significantly encouraged wind power development, with astounding success. More than 3,300 megawatts of wind power have connected to BPA's grid, with thousands more queued.

* Such as: exempting wind from certain penalties, Network Open Season, Conditional Firm, Generation Imbalance Services. BPA is also testing the effectiveness of other innovative approaches, including intra-hour scheduling, customer self-supply of certain reserves and dynamic transfers. This graph shows sequential increases in capacity, based on date when actual generation first exceeded 50 percent of nameplate.

Designating resources to serve specific loads:

Utilities that take a certain kind of transmission service from BPA called network integration must assign or “designate” the power resources they intend to use to meet their loads. BPA sets aside transmission to carry power from those resources to the utility’s load. If a utility wishes to use a resource for another purpose, such as to make a sale to a third party, it must “undesignate” that resource, freeing up the corresponding transmission capacity to be sold to other users. FERC’s Order 890 requires utilities to change the designation every time use of a designated resource changes, even if only for an hour.

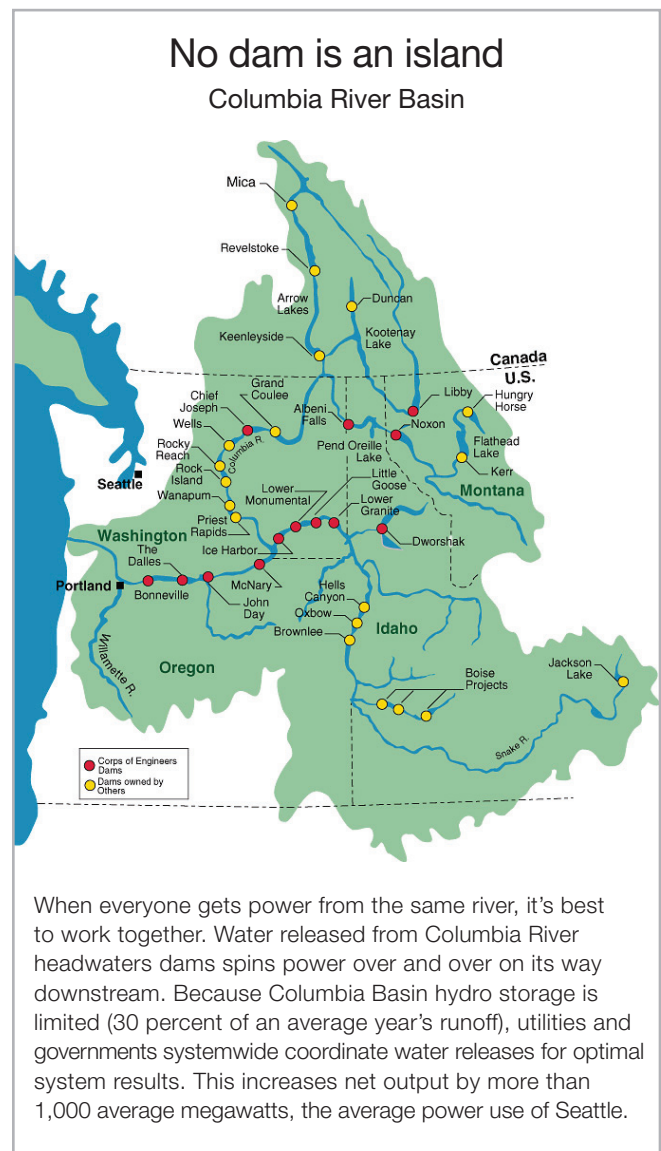
Most of these customers have designated their BPA power sales contract as their designated network resource. The BPA power sales contract is a sale from the federal power system as one interdependent system. Within any day or hour, depending on the weather, streamflows, fish requirements, wind patterns and numerous other factors, some or all of the power from any specific dam or combination of dams may provide power for different kinds of sales, back up fluctuations in wind power, and/or be sold as surplus power. Other utilities’ Columbia River system resources are also affected as all are operated in coordination with federal resources under the 1964 Pacific Northwest Coordination Agreement. Undesignating specific hydroelectric resources for periods of less than a year would be highly impractical for BPA and its customers.

BPA requested a deviation from FERC’s tariff so that BPA and its network integration customers would not have to undesignate resources for periods of less than one year. FERC approved the deviation but requested more information. Therefore, we do not know whether FERC’s approval will stand.

Two types of a new service: Order 890 calls for two types of a new transmission service called conditional firm service, which can make better use of existing transmission. BPA included one type in its tariff and now provides more conditional firm

service than any other transmission provider.* FERC asked BPA to add the second type, called system conditions conditional firm service. BPA customers have expressed very little interest in using this second form of conditional firm service, and BPA would have to incur significant costs to offer it.

Short-term sales windows: Some customers need transmission only for a short period, such as a day, week or month. BPA and some other utilities limit how far in advance customers can reserve this



* See graph on page 10.

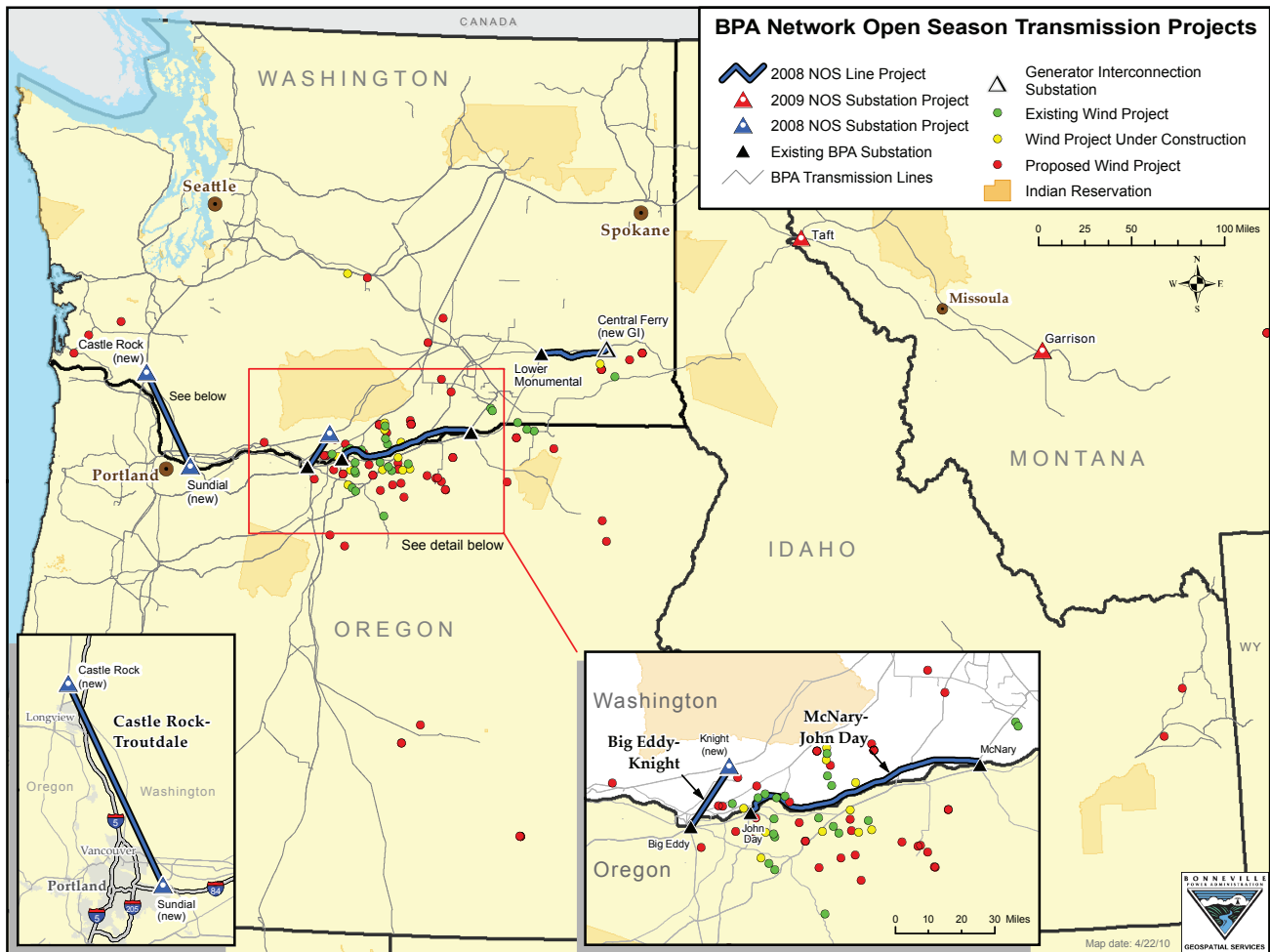
short-term service. In these cases, FERC’s tariff requires a “simultaneous window” approach to awarding service in which all requests that come in during a five-minute or other specified period are given equal priority. This contrasts with FERC’s standard first-come, first-served approach, where those with the fastest computers always go to the head of the line. BPA agrees with the idea of a “simultaneous window.” The question for our customers is, how high a priority is it to implement? It would take about a year and cost about \$250,000 to develop the necessary computer systems. We intend to move forward with implementation, but our timeline is uncertain.

NEW ISSUES

Since FERC denied reciprocity status for BPA’s tariff in 2009, BPA has not made additional filings, pending resolution of BPA’s Order 890 filing. Meanwhile, new concerns have been piling up.

Some of these new issues involve how to reconcile innovative regional practices that benefit customers with the more traditional approaches outlined by FERC. Some involve BPA’s statutory responsibilities. Others would require process changes, automation and/or tariff modification. Here are some of the more significant issues on BPA’s list.

Growing the grid for the economy and green energy



BPA’s Network Open Season approach to transmission line prioritization and financing has enabled BPA to propose new transmission to meet regional needs and integrate thousands more megawatts of wind power.

Study timelines for requests outside Network

Open Season: BPA addresses most transmission requests through its annual Network Open Season. BPA understood that the opportunity for a customer to choose the traditional process under the national tariff was an important assumption behind FERC's approval of Network Open Season, so BPA included an opportunity to "opt out" of Network Open Season in its tariff. Opting out of Network Open Season allows a requestor to follow the traditional FERC process.

But, for a customer who has opted out, BPA does not expect it will be able to fulfill the time requirements for studies of its request specified in FERC's tariff. FERC requires two studies, each of which must be completed in 60 days (120 days, total). Under Network Open Season, BPA considers all requests simultaneously to identify the best solutions for all. Unless an opt-out requestor is at the head of the queue, completing two studies within 60 days each, as required under the FERC procedure, would mean completing studies for all higher-queued requests in that timeframe as well. This is not feasible and would undermine the effectiveness of Network Open Season, because BPA currently dedicates experienced staff to conduct studies using that more efficient and effective approach.

BPA does not now offer an open season on intertie capacity, so FERC standard study timelines apply. BPA is not doing studies on requests for capacity on its California or Montana interties because BPA knows from past efforts that the multiple ownership and scale of intertie lines makes expansion a complex and costly undertaking requiring consensus among parties. An intertie open season is probably needed to examine potential expansion.

Price cap for resales: In its Order 890 tariff, FERC made a change that temporarily allowed transmission service purchasers to resell to other buyers at a negotiated, uncapped price. FERC monitored and

studied the resulting secondary market for capacity reassignments and, based on a little over two years' worth of data, determined it was appropriate to permanently remove the price cap on resales of transmission capacity.

BPA participated in this experiment. In fact, most of the transmission resales nationwide during the time period occurred on BPA's system. BPA supports reasonable price flexibility for transmission resales.

However, based on first-hand experience in the West Coast Energy Crisis of 2000-2001, BPA remains cautious about completely uncapping resale prices. Electricity prices soared from tens of dollars to thousands of dollars per megawatt-hour during that crisis. In some cases, federal power was resold at prices substantially higher than its original cost-based rate. Given the potential for transmission congestion in the West, BPA believes some mechanism or "safety valve" should be in place to prevent the resale of federal transmission in a manner that harms consumers through exorbitant pricing.

BPA believes it should take this position as part of its statutory charge to provide the lowest cost to consumers consistent with sound business principles. Language in BPA's existing tariff may meet this need.

Intra-hour scheduling: BPA supports intra-hour transmission scheduling to make more effective use of resources and to effectively integrate wind power and other variable resources. BPA launched a pilot project for 30-minute transmission scheduling last year and is working with two regional initiatives (ColumbiaGrid and the Joint Initiative) to pursue greater use of intra-hour scheduling.

BPA may need a tariff revision for an upcoming phase of its 30-minute pilot project. However, FERC's view of such a revision is uncertain given its recent Notice of Proposed Rulemaking on Variable Energy Resources, which calls for comprehensive 15-minute scheduling.

Priority access to federal transmission: BPA believes it is required by law to give federal power priority access to contractually uncommitted transmission capacity in certain instances. For example, BPA must give priority to deliveries of federal power to new BPA preference utility customers. This priority does not affect transmission capacity that is under contract to another customer.

FERC standards require that service goes to those customers that are first in line. It does not provide for priority access. BPA believes its transmission tariff should reflect its statutory obligation to use federal transmission as Congress intended.

Compliance with environmental laws and the Northwest Power Act: BPA must comply with federal statutes such as the Endangered Species Act, Clean Water Act and Northwest Power Act, which

provide for the protection of fish and wildlife. For example, BPA is currently defining additional steps it may have to take to protect fish from high levels of dissolved gas in rivers during high water and wind conditions. BPA expects to issue a draft Record of Decision on the subject soon. For clarity, BPA's tariff should explicitly reflect actions BPA may take to comply with environmental laws that may affect transmission. BPA expects to amend its tariff once the specifics of those requirements have been fully defined.

Requirements for posting available transmission capacity: BPA routinely posts on its website the available transmission capacity for each upcoming hour, day, week and year at 10 critical points on its network transmission system known as flowgates. Customers seeking transmission service can easily tell from the posted information and

accompanying online tools whether sufficient capacity is available to accommodate their requests. This is an efficient means of sharing information, and customers appear satisfied with it.

FERC requires utilities to post the availability of transmission capacity for every transmission path that connects different balancing areas, plus some transmission paths within BPA's network. For BPA's large grid, this could mean posting up to 2 million paths each hour, day, week and year. Systems to collect and post such extensive data would be costly and do not appear to provide any meaningful additional information of use to customers.

More than power is at stake



Unlike thermal power plants, hydroelectric plants are one of many uses of a Northwest dam. Depending on their features, federal and non-federal projects are operated to protect fish, prevent floods, pump and provide irrigation and municipal water, support navigation and foster river recreation. All these uses can have a significant impact on the availability of hydropower and, in turn, Northwest transmission.

Transmission curtailment priorities: When non-firm transmission schedules for the next hour exceed capacity, the national tariff requires curtailment on a pro-rata basis. All affected customers must then adjust accordingly. In the Northwest, the standard regional practice is to curtail these reservations according to a last-in, first-out approach with the most recent non-firm transactions curtailed first. This minimizes the number of schedules affected, providing for efficient and cost-effective market operation. BPA could work with other regional transmission providers to seek a unified tariff deviation to allow the current, efficient business practice to continue. Alternatively, Northwest utilities could change their practices to curtail all such transactions on a pro-rata basis.

Additional technical issues: There are a number of additional technical issues on BPA’s list of tariff

terms to discuss with customers. A list of all issues identified to date is found on page 12.

WHERE WE GO FROM HERE

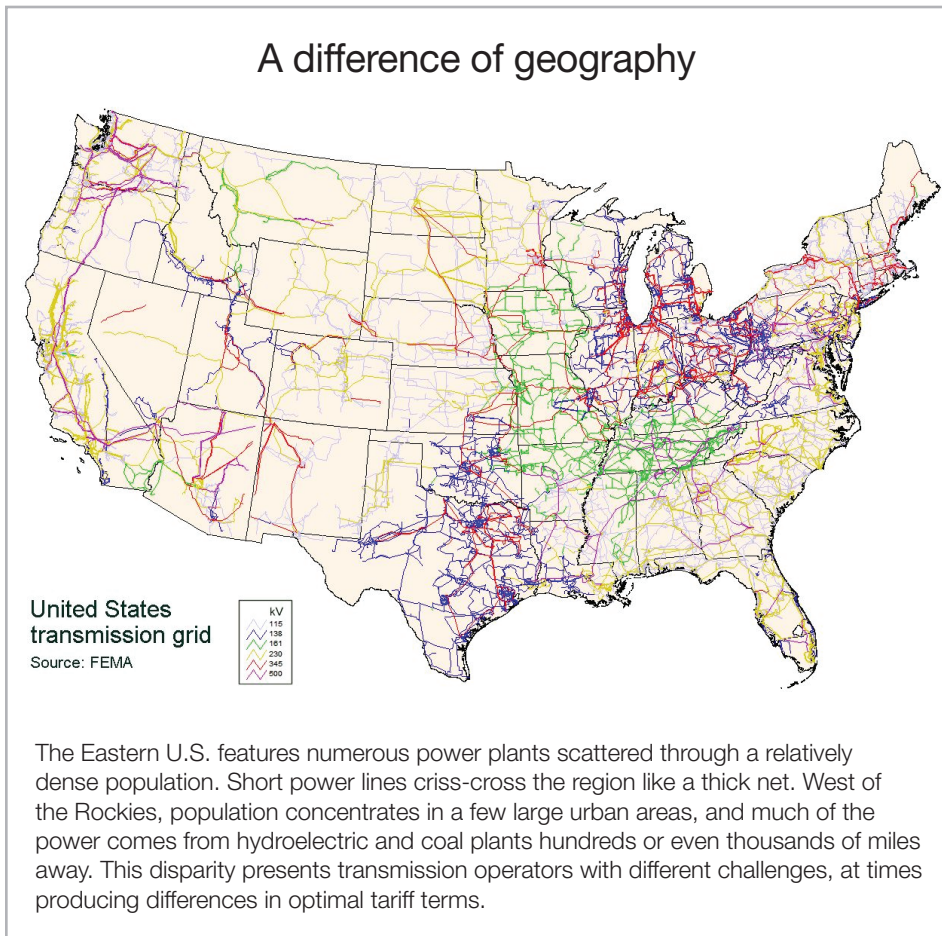
In the next few months, BPA will discuss all the above issues with its customers, as well as other tariff issues that customers bring to the table.

BPA believes that it is important that its tariff accurately reflect its practices. Where necessary, BPA may revise its practices to comply with its tariff or revise its tariff to accurately reflect current practices. We want to say what we do and do what we say. Some of BPA’s practices today reflect common, effective regional industry practices that are not spelled out in the tariff. Others are unique practices that were developed as BPA resolved issues with customers. Finally, in some areas, BPA expects to change its practices as its priorities and resources allow.

In some cases, FERC’s national directions for investor-owned utilities may not work well for BPA, given the physical constraints of the Northwest’s interdependent hydroelectric system and BPA’s statutory directives.

Given these issues, BPA and its customers must ask, what is the most productive course to meet regional goals of open access non-discriminatory service and effective use of the transmission system?

Which direction would best keep costs low to consumers and protect the environment?



BPA as a transmission management lab

In many ways, BPA serves today as a laboratory for transmission innovations. Network Open Season has resulted in commitments to provide transmission for more than 7,000 megawatts of power, more than half of it for wind projects.

In some cases, FERC has adopted BPA transmission innovations nationwide.

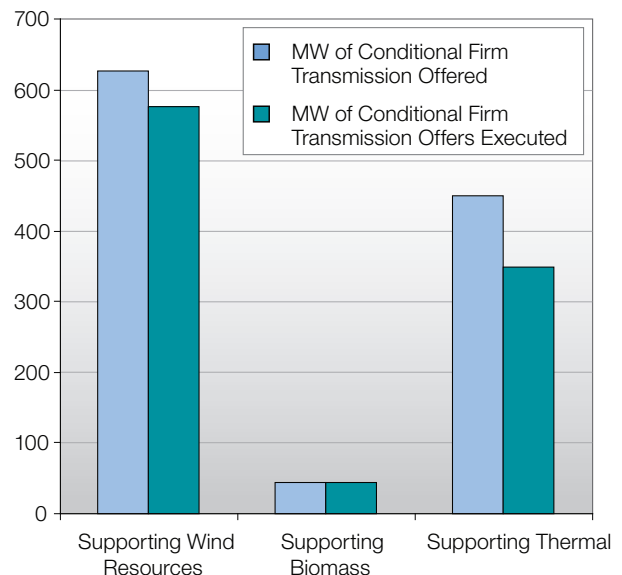
For example, BPA worked with the American Wind Energy Association, FERC and others early in the last decade to develop conditional firm transmission service. This service allows wind generators and other customers to purchase transmission capacity that would otherwise not be available on a long-term basis because it is not available around-the-clock, 365 days a year. In some cases, conditional firm service has made it possible for new wind plants to begin selling their energy while they are waiting for new transmission construction to provide full-time capacity. Since 2009, BPA has identified and offered 1,200 megawatts of conditional firm service.

In Order 890, FERC adopted tiered “energy and generator imbalance provisions similar to those in use by Bonneville.” BPA had exempted wind projects from penalty charges for extreme deviations between their scheduled and actual output, recognizing that those penalties were designed for thermal power plants that have more control over their output.

Beginning in 2009, wind project owners and utilities in BPA’s service territory called on BPA

Stretching use of existing capacity

BPA Conditional Firm Transmission, 2009-2011



BPA has so far offered about 1,200 megawatts of conditional firm transmission service to wind, biomass and thermal generators and has sold about 1,000 megawatts.

to fund a Wind Integration Team to develop new technical solutions to managing large amounts of wind power in BPA’s transmission grid. This team successfully launched six pilot projects in 2009 and 2010. Seven are in progress in 2011. Commenters universally call for more work in this area, faster. BPA also has been working closely with FERC on wind integration tools and techniques.

This fertile innovation and collaboration among BPA, its customers and FERC could be affected if BPA must divert resources to achieve and maintain reciprocity status.

Conferring with the region

BPA is committed to working openly and transparently with the Northwest to provide reliable, cost-effective, open access and non-discriminatory transmission service that best meets the region's needs and fulfills BPA's statutory requirements.

BPA seeks to provide open access, non-discriminatory transmission service in ways that make full use of existing transmission capacity, support needed system expansion and maintain high reliability. BPA manages its investments to assure that these goals are met at the lowest possible cost to consumers consistent with sound business principles.

What are the region's preferences for BPA's direction on the issues described above and others customers may raise? Given the world of expectations and needs facing BPA's transmission system, should BPA continue to seek reciprocity status from FERC? Or should BPA let that effort go for now and work with FERC as a non-jurisdictional utility that actively collaborates with FERC but does not seek or receive reciprocity status?

We invite discussion.

For more information

Reciprocity discussions to date, including comments:

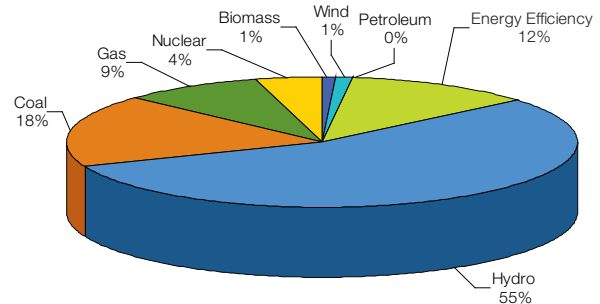
http://transmission.bpa.gov/Business/Rates_and_Tariff/order890.cfm?page=relatedinfo

Tariff reciprocity issues materials dated Feb. 9, 2011:

http://transmission.bpa.gov/Customer_Forum/tx_customer_forum/

What will work best next?

Sources of Electricity Supply in the Pacific NW in 2009



The Northwest Power and Conservation Council has called on the region to meet 85 percent of its additional power needs with energy efficiency over the next 20 years. Much of this will have to come from improved transmission tools through the smart grid and demand response techniques, as well as improved integration of variable wind and solar power. How should Northwest utilities approach BPA's transmission tariff to best support achieving these regional and national goals?

Source: NW Power & Conservation Council

Transmission Issues Chart:

http://transmission.bpa.gov/Customer_Forum/tx_customer_forum/documents/transmission_issues_chart.pdf

Issue Paper:

http://transmission.bpa.gov/Customer_Forum/tx_customer_forum/documents/FinalReciprocityIssuesPaperFinal.pdf

Transmission Issues Chart

BPA Transmission Customer Forum

Feb. 9, 2011

A

New Process Can Be In Place Within One Year		
OATT* Section	Description of Issue	Type of Change
1 2.2 & 17.7	Conduct LT Firm Competitions (Renewal & Deferral)	Process/Automation
2 Section 6	Require Reciprocity Statement from Customers	Process
3 19.9 & 32.5	Begin Posting Study Metrics Percentages	Process
4 Attach. C	Fix Broken Link for ATC Methodology Data	Process
5 Attach. L	Attachment L - Meet LGIP Timelines	Process
6 18 C.F.R. Sec. 37.6 (e)	Post List of DNRs on OASIS	Process
7 18 C.F.R. Sec. 37.6 (h)	Begin Posting Data from SIS & SFS	Process
8 18 C.F.R.	Meet Deadlines for Posting Study Results	Process
9 Order 890 & PF OATT 15.4c.	Provide Systems Conditions for Conditional Firm	Process/Automation

B

New Process Will Take Longer Than One Year (Timeline estimates are subject to resource constraints and reprioritizations)			
OATT Section	Description of Issue	Type of Change	Timeline (Rough Est.)
10 13.2 & 14.2	Create ST Bumping Market	Automation	2012/8mo.
11 14.1, 14.5 & 14.7	Offer NF PTP Products Beyond Hourly	Automation	2013/8mo.
12 33.2	Redispatch All NT Resources	OATT Imp.	2011/ ?
13 13.6, 33.2 & 33.5	Conduct Non Discriminatory Redispatch	Automation	2011/ ?
14 Attach. K	Finalize Business Practices	Process	2011/2-3yrs
15 18 C.F.R.	Post ATC Calculation Data	Process	2012/2-3yrs
16 18 C.F.R. Sec. 37.6 (b)	Post CBM Practices	Process	2011/1-2 yrs
17 S&CPs	Stop Selling Unlimited Hourly Firm & Non-Firm	Process/Automation	2011/21mo.
18 Order 890	Allow Conditional Firm Resales & Redirects	Automation	2013/6mo.
19 Order 890	Implement Simultaneous Windows	Automation	2012/15mo.

C

BPA Believes We Can Resolve Through Working With FERC		
OATT Section	Description of Issue	Type of Change
20 6.1.2 & 16.2	Attachment K - Collect Customer Ten Year Forecasts	OATT Mod.
21 17.2	Collect Customer Generation Location & Capacity Data	OATT Mod.
22 29.2	Collect Customer Redispatch Cost Data	OATT Mod.
23 Attach. J	Require Customers to Pay for Line/Load Studies	OATT Mod.
24 33.1, 33.6, 35.2 & 35.3	NT NOA/NOC - Include Missing Information	OATT Mod.
25 Section 9	File Current Attach. M with FERC	OATT Mod.
26 Attach E & I	Update Customer List	OATT Mod.
27 Attach. O	Sign PTSA Exhibits Consistent with Contract	OATT Mod.

*Open Access Transmission Tariff

D

Likely OATT Modifications			
OATT Section	Description of Issue	Type of Change	Reference
28 17.5	App. Response Timeline	OATT Mod.	See Current Issue# 1
29 17.5	Opt Out Timeline	OATT Mod.	See Current Issue# 2
30 13.5, 15.2, 4(a), 17.5, & 19.4	Intertie Studies	OATT Mod.	See Current Issue# 3
31 13.6 & 14.7	Curtailed by LIFO	OATT Mod.	See Current Issue# 4
32 13.8 & 14.6	Intra-hourly Scheduling	Automation	See Current Issue# 5
33 19.7	R/O of Partial Term Offers	OATT Mod.	See Current Issue# 6
34 18 C.F.R. S&CPs	LT Offer Remainders	OATT Mod.	See Current Issue# 7
35 Order 890 & 18 C.F.R. ATC/AFC Posting		OATT Mod.	See Current Issue# 8
36 22.2 & Order 890	Netting for Redirects	OATT Mod.	See Current Issue# 9
37 23.1 & Order 890	Price Cap Resales	OATT Mod.	See Current Issue# 10
38 23.1 & Order 890	Financial Middleman	Automation	See Current Issue# 11
39 Order 890	Gen. Imb./ Schedule 9	OATT Mod.	See Current Issue# 12
40 TBD	Priority Access to Transmission	OATT Mod.	See Current Issue# 13
41 TBD	ESA	OATT Mod.	See Current Issue# 14

E

Potential OATT Modifications That Require Further Development			
OATT Section	Description of Issue	Type of Change	Reference

BPA is working closely with its transmission customers on how best to respond to FERC tariff issues. This chart, used at a Feb. 9 customer forum, lists:

- A) issues BPA believes it can resolve within one year,
- B) those for which more than a year would be needed to implement changes,
- C) issues BPA believes it can resolve by working with FERC, and
- D) issues that likely would require tariff modification to achieve reciprocity status.

Section E is a placeholder for additional issues customers may raise. BPA will continue to discuss these issues and any others raised by customers in further workshops this spring.