

Responses to Comments Received Regarding 5/25/07 OASIS Posting of Draft for Comment DNR Business Practices

1. The “Temporary Designated Network Resource Un-Designation” form includes a section for “Attestation for redesignating”. We don’t believe that an attestation is required under the OATT for redesignating. Please explain this requirement. **See Order 890, paragraph 1541 and the pro forma OATT, section 30.2(iv).**
2. Please provide a definition or what you would accept as eligible criteria of an “authorized officer” as it relates to Section 29.2(viii) of the Pro Forma OATT? **The transmission provider is not required to specify or determine criteria for eligibility to sign a DNR attestation. The complete text of 29.2(viii) also includes “or agent of the Network Customer” so it is not restricted to officers only.**
3. Is it possible for the “authorized officer” to delegate all or a portion of his/her duties as required under the OATT? For example, could the “authorized officer” delegate daily designations to the preschedule desk? **It seems reasonable to interpret FERC’s intent in 29.2(viii) was to accommodate delegation by officers to agents, but this is beyond the transmission provider’s role in DNR application assessment.**
4. Hourly non-firm transmission is widely used in the WECC region to support WSPP Schedule C firm transactions. Will designation of off-system resources be allowed using HNF transmission from the generating source to BPAT.PSEI? **Order 890, paragraph 1521, requires that transmission providers continue to be responsible for verifying that third-party transmission arrangements to deliver the [DNR] purchase to the transmission provider's system are firm. In addition, there is cite in paragraph 1091, Wisconsin Public Power Inc. v. Wisconsin Public Service Corp., 84 FERC ¶ 61,120 at 61,660 (1998) (WPPI), in which FERC stressed the importance of non-interruptible transmission arrangements for network resources.**
5. Other Transmission Providers allow short-term (less than 7 days) undesignations to be notified by utilizing tags. Would PSEI consider utilizing this method? If not, why? **No. Informal undesignations mechanisms were rejected by FERC in Order 890, paragraph 1577.**
6. Please clarify if undesignating a DNR for less than a day is allowed. **Order 890, paragraph 1583, said there is no minimum term for undesignations. PSEI will have a business practice that undesignations must be specified in whole MegaWatts and must start at the top of an hour and end at the top of an hour. PSEI will modify our draft undesignation form to accommodate hourly start and stop times.**
7. If we reserve daily firm transmission for a DNR that is scheduled for HLHs only in preschedule, does the unused LLH transmission roll over to real time for their use? If not, what happens in those cases? **Network transmission service associated with a specific DNR(s) may only be “used”, or scheduled, by that DNR(s), regardless of the scheduling time frame (preschedule or real-time).**
8. Paragraph three of the Draft for Comment DNR Business Practice requires the network or native load customer to submit a request for network transmission service for off-system DNRs. Please explain this requirement and why it differs from on-system DNRs? If a request for network transmission service is not pre-confirmed, what is the estimated additional time needed for confirmation? **Please see Order 890, pro forma OATT section 29.2(v) which contains specific information requirement for both on-system and off-system resources. Transmission providers approve transmission service requests while confirmation is a customer action. Preconfirmation is an option, but under 890, imparts priority in competition for limited transmission resources.**