

FERC'S TRANSMISSION TARIFF REFORM INITIATIVE

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ORDER 890: EVOLUTION, NOT REVOLUTION



The Nature Of The Changes

- ➔ Order 890 reforms the Commission's *pro forma* Open Access Transmission Tariff (OATT).
- ➔ The reforms are incremental/evolutionary; Order 890 does not provide for a change in industry structure that would be revolutionary.
- ➔ The fundamental structure of the OATT is maintained.

Reasons For Reforms To The OATT

- ➔ OATT leaves too much discretion to the transmission providers.
- ➔ Economic interests of transmission providers continue to provide incentives for discriminatory behavior with respect to transmission service provided to customers.
- ➔ Discretion plus incentives equals opportunities for discriminatory behavior under the current *pro forma* OATT.

The Reforms

- ➔ Clarification and consistency with respect to available transmission capacity determination
- ➔ Increased transparency for transmission system planning
- ➔ Modification of services, including:
 - Redispatch and Conditional Firm Service
 - Rollover Rights
 - Imbalance Services
- ➔ Enhanced enforcement

Applicability

- ➔ All “non-independent” transmission providers
- ➔ RTOs and ISOs
 - RTOs/ISOs can demonstrate that existing OATT provisions are consistent with or superior to Order 890 revised provisions.
 - Order 890 is not intended to upset market designs used by RTOs/ISOs.

Applicability (cont'd)

➔ Public power utilities

- Order 890 retains reciprocity provisions.
- If transmission service is obtained from an RTO/ISO, the reciprocity obligation is extended to all members of the RTO/ISO.
- Requests for service from a non-public utility under Section 211a of the Federal Power Act will be handled on a case-by-case basis.
 - ✓ Applicant has burden of proof to show why, if the non-public utility has a safe harbor tariff, service under that tariff is not sufficient.

AVAILABLE TRANSFER CAPABILITY



Consistency In ATC Calculations

- ➔ All transmission providers must use consistent components of ATC calculations:
 - TTC
 - ETC (Existing Transmission Commitments)
 - CBM
 - TRM
- ➔ ATC calculation formulas must be few in number and produce consistent results.

Capacity Benefit Margin

- ➔ Transmission Providers must develop clear standards for CBM calculation and include them in Attachment C.
- ➔ All LSEs must have access to CBM and input to the calculations.
- ➔ CBM cannot be included in calculation of non-firm ATC.
- ➔ Firm point-to-point transmission rates must be revised within 120 days to not include the cost of the CBM set-aside.
 - CBM set-aside must be added to the load and reservations used in rate design.

Transmission Reserve Margin

- ➔ TRM may be used for:
 - Load forecast and load distribution error
 - Variations in facility loadings
 - Uncertainty in system topology
 - Loop flow impact
 - Variations in generation dispatch
 - Reserve sharing
 - Other uncertainties
- ➔ TRM set-aside need not be sold on a non-firm basis.

Transparency In ATC Calculations

- ➔ Transmission providers must set out in Attachment C detailed information about ATC calculations.
 - Identify which ATC methodology is used.
 - Describe the algorithm for calculating firm and non-firm ATC.
 - Define all ATC components (ATC, ETC...).
- ➔ Attachment C must be filed within 60 days and revised within 60 days after NERC and NAESB revise reliability standards.

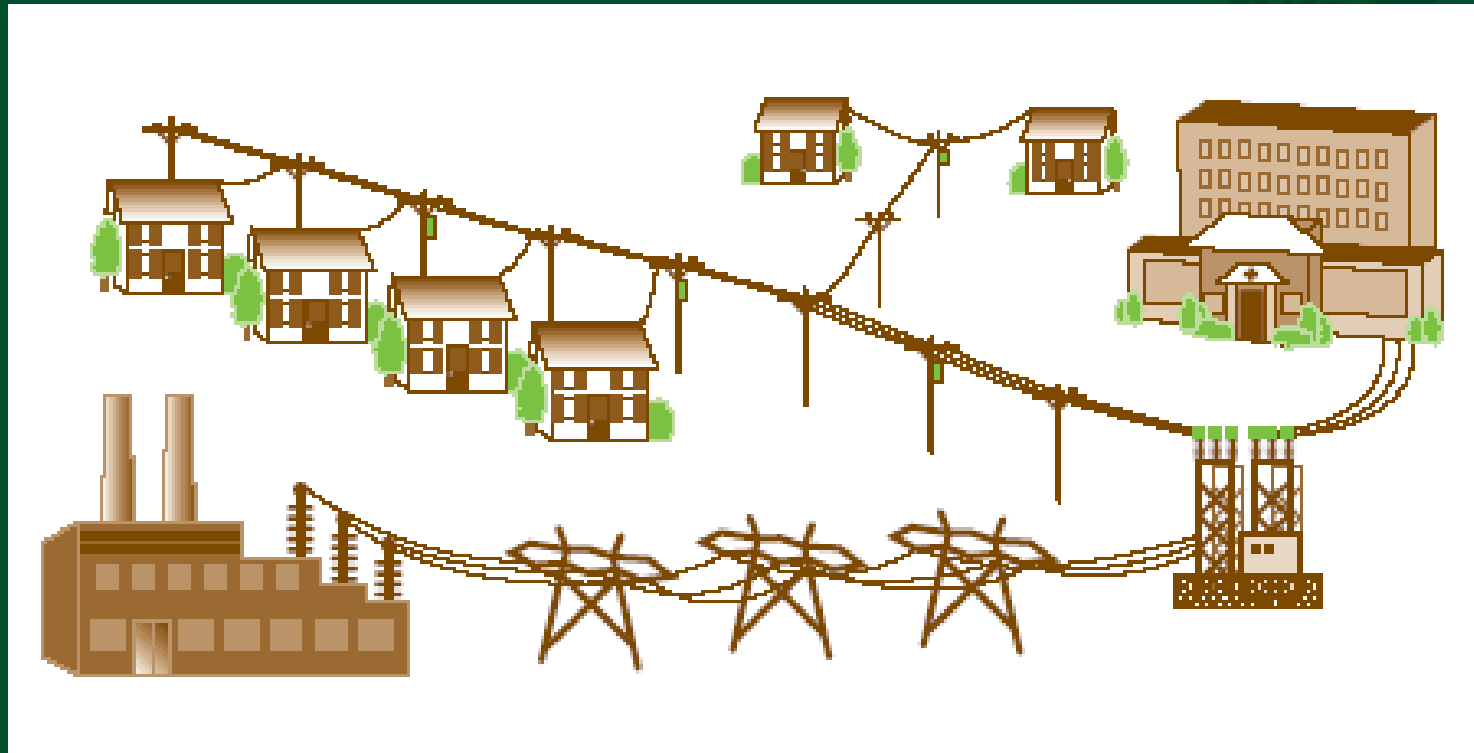
OASIS And Web Site Posting Requirements

- ➔ Algorithms used to calculate ATC must be posted on web sites.
- ➔ Lists of system impact studies, facilities studies and studies for the transmission provider and affiliates must be posted on OASIS.
- ➔ CBM and TRM set-asides must be posted on OASIS and re-evaluated annually.
- ➔ Explanations of changes in monthly and yearly ATC must be posted when they change as a result of a 10% change in TTC.
- ➔ Reasons for denials of service must be posted on OASIS.

OASIS And Web Site Posting Requirements (cont'd)

- ➔ Firm reservations that are not scheduled must be posted as non-firm ATC.
- ➔ Metrics on acceptance and rejection of service requests by affiliates and non-affiliates must be posted on OASIS.
- ➔ Load forecasts used for ATC calculations and prior-day peak loads must be posted.

TRANSMISSION PLANNING



What And Why

- ➔ Final Rule directs changes in the transmission planning process:
 - Increased coordination among stakeholders.
 - Increased transparency so all stakeholders have access to information.
 - A more inclusive process that brings all stakeholders, including interested state government representatives to the table.

What And Why (cont'd)

- ➔ Reasons for changes to planning process:
 - Increased congestion.
 - Need for additional transmission capacity.
 - Building new transmission is not in the self-interest of transmission owners.
 - New Section 217 of the Federal Power Act requires the Commission to facilitate the building of new transmission facilities to meet reasonable needs of load serving entities.

What And When

- ➔ Each public utility transmission provider must file, as part of its Order 890 compliance filing, a proposed coordinated and regional planning process consistent with the principles spelled out in the Order.
- ➔ RTOs and ISOs must either reform their current planning practices consistent with Order 890 or show that their current processes are equal to or better than the Final Rule process.
- ➔ All transmission owning RTO/ISO members must participate in the planning process.

What And When (cont'd)

- ➔ All non-public utilities are expected to participate.
- ➔ Commission will convene regional staff technical conferences to discuss implementation and other compliance issues within 90-120 days after issuance of Final Rule.
- ➔ Transmission Providers must post “strawman” planning process within 75 days after publication of Final Rule.

How – The Details

- ➔ Key determination is that the ultimate responsibility for transmission planning remains with the transmission providers.
 - Intent of Order is to establish open, coordinated, non-discriminatory transmission planning process.
 - Order does not dictate which investments identified through the planning process should be built or how such investment will be compensated.
 - However, customers must have a real opportunity to participate in the planning process, not simply comment on a proposed transmission plan.

How – The Details (cont'd)

➔ The planning principles:

■ Coordination

- ✓ Open lines of communication with customers.
- ✓ Order allows for flexibility.
- ✓ Transmission Provider responsibility is to provide opportunity for all to participate.

■ Openness

- ✓ Transmission planning meetings open to all affected stakeholders, including but not limited to customers and state commissions.
- ✓ Transmission Providers with stakeholders must develop mechanisms to address confidentiality and critical infrastructure concerns.

How – The Details (cont'd)

■ Transparency

- ✓ Transmission Provider must share all basic assumptions and data used in transmission planning process.
- ✓ Transmission Providers must make available methodology, criteria and processes used in written form.
- ✓ Non-public utilities must provide similar information.
- ✓ Transmission Providers must provide status of upgrades.
- ✓ Information provided in Forms 714 and 715 is not sufficient to assure that all stakeholders have comparable information.
- ✓ Demand resources that are capable of providing functions assessed in transmission planning and available on a long-term basis are to be included as participants in the process.

How – The Details (cont'd)

■ Information exchange

- ✓ Transmission Providers and stakeholders are to develop guidelines and a schedule for the submission of relevant information.
- ✓ Information used by Transmission Provider to serve native load customers must be transparent.
- ✓ Transmission Customers must provide equivalent information.
- ✓ Point-to-Point customers must provide their long-term needs, points of receipt and points of delivery.

How – The Details (cont'd)

■ Comparability

- ✓ The Transmission Provider must develop a transmission system plan that:
 - addresses Transmission Customer service requests;
 - treats similarly situated customers comparably.
- ✓ Comparability means treating interests of Transmission Customers and Transmission Providers the same.

How – The Details (cont'd)

■ Dispute resolution

- ✓ Transmission Provider must develop dispute resolution procedures.
- ✓ Dispute resolution must address both procedural and substantive issues.
- ✓ Dispute Resolution is not intended to address non-FERC jurisdictional issues, but comparability of retail-wholesale service may be appropriate for dispute resolution.

How – The Details (cont'd)

■ Regional participation

- ✓ Transmission Provider must coordinate with interconnected systems as well as develop planning process for local control area.
- ✓ Regional Planning should:
 - Share data to ensure local plans are simultaneously feasible;
 - Ensure that consistent assumptions and data are used;
 - Identify system enhancements to relieve congestion and integrate new resources;
 - Eliminate “piecemeal” planning.
- ✓ Geographic scope of regions is to be determined by individual regions and subregions.

How – The Details (cont'd)

■ Economic planning studies

- ✓ Expand planning to include both reliability and economic considerations. Studies should include both upgrades to relieve congestion and upgrades to integrate new resources and loads.
- ✓ Coordinated system studies will provide customers the opportunity to consider potential upgrades and investments beyond those that are identified in a study in response to a specific request for service.
- ✓ Transmission Provider obligation to perform system studies does not impose obligation to build identified facilities or assign cost responsibility for implementing the studies.

How – The Details (cont'd)

- ✓ RTO/ISOs do not have a blanket exception from the obligation to perform economic planning studies.
- ✓ Stakeholders have the right to request five to ten high priority studies to be performed each year.
- ✓ Cost for studies that are not performed in response to specific requests for service are recovered in the embedded cost of service.

How – The Details (cont'd)

- Cost allocation for new projects
 - ✓ The Commission will allow regional flexibility for cost allocation of regional projects and other projects that will not fit under existing cost allocation methodologies.

How – The Details (cont'd)

- ✓ Commission will resolve disputes using the following principles:
 - Costs will be fairly allocated among those who cause costs and those who benefit from new project.
 - Cost allocation must provide incentives for new transmission construction.
 - The cost allocation methodology should be generally supported by states and participants in the region.
 - Those who benefit from a congestion relief project should pay for that project.

How – The Details (cont'd)

- ➔ Other transmission planning issues
 - FERC will not require utilities to use an independent third-party coordinator of planning.
 - State participation is encouraged.
- ➔ The Commission rejects the proposal to mandate open seasons and joint participation in transmission projects, but it will continue to encourage joint ownership.

TRANSMISSION PRICING



Overview

- ➔ Consistent with the NOPR, FERC did not undertake a comprehensive overhaul of its transmission pricing policy.
- ➔ FERC ordered specific pricing reforms to discrete provisions of the pro forma OATT, including:
 - Energy and generator imbalances;
 - Transmission capacity reassignment; and
 - Operational penalties.

Energy and Generator Imbalances

- ➔ FERC adhered to the three NOPR Principles:
 - Charges must be based on incremental cost or some multiple thereof;
 - Charges must provide an incentive for accurate scheduling; and
 - The provisions must account for the special circumstances of intermittent generators.

Energy and Generator Imbalances (cont'd)

- ➔ FERC adopted the same provisions for energy and generator imbalances.
 - Similar to BPA's tiered approach with graduated deviation bands and escalating deviations and penalties.
- ➔ Modified OATT Schedule 4 for Energy Imbalance.
- ➔ Created a new OATT Schedule 9 for Generator Imbalances.
- ➔ The customer pays for penalties for energy imbalances or generator imbalances, but not both.

Energy and Generator Imbalances (cont'd)

- ➔ Tier 1: Imbalances $\leq 1.5\%$ of the scheduled energy (or 2MW, whichever is larger)
 - Imbalances are netted on a monthly basis and settled financially.
 - Customer pays 100% of incremental or decremental energy cost.
- ➔ Tier 2: Imbalances between 1.5% - 7.5% of the scheduled energy (or 2-10 MW, whichever is larger)
 - Customer pays 110% of incremental energy cost or receives 90% of decremental energy cost.

Energy and Generator Imbalances (cont'd)

- ➔ Tier 3: Even larger imbalances
 - Customer pays 125% of incremental energy cost or receives 75% of decremental energy cost.
 - Intermittent generators are exempt from Tier 3 penalties.

Imbalances – Other Issues

- ➔ Energy imbalances and generator imbalances will not be netted outside Tier 1.
- ➔ If the transmission provider wants to recover demand costs from setting aside additional reserves to meet imbalances, it should file a demand charge in a rate schedule.
- ➔ FERC does not abrogate existing generator imbalance provisions in interconnection agreements.
- ➔ FERC will not impose penalties on a generic basis for intentional deviations.

Distribution of Imbalance Revenues

- ➔ Revenues in excess of costs must be credited to all non-offending transmission customers, including non-affiliates, affiliates and native load.

Operational Penalties

Unreserved use penalties

- Adopts current policy – 2X the standard rate for the period of unreserved use.
 - ✓ There is a minimum penalty based on the daily rate.
 - ✓ More than one assessment for a given duration (e.g., daily) will increase the penalty period to the next longest duration (e.g., weekly).
- Covers illegal use of network service to support off-system sales to third parties (e.g., PacifiCorp and SCANA audits).
- In addition to this OATT penalty, civil penalties are possible.

Operational Penalties (cont'd)

Late Study Penalties

- Adopts NOPR proposal to impose penalties for late studies.
- \$500 per day per late study outside the OATT's 60-day due diligence deadlines.
- Penalties also apply to RTOs/ISOs/independent tariff administrators.

Operational Penalties (cont'd)

Late Study Penalties

➔ Process

- If transmission provider processes more than 20% of studies for non-affiliates outside the 60-day due diligence deadline for two quarters, it must make a notification filing at FERC.
- Operational penalties will be assessed if the provider continues to be out of compliance (processes 10% or more of non-affiliate studies late) for each of the two quarters following the notification filing.
- Transmission providers may explain extenuating circumstances that justify not assessing penalties.

Distribution of Operational Penalties

- ➔ Revenues from operating penalties must be redistributed to all non-offending transmission customers, including non-affiliates, affiliates and native load (except late study penalties go only to non-affiliates).
- ➔ FERC requires that the transmission provider make a compliance filing, which proposes how it will identify non-offending transmission customers and distribute revenues from unreserved use penalties and late study penalties to them.
- ➔ In an annual filing, the transmission provider must report penalty revenue that it has received and distributed to customers.

Transmission Capacity Reassignment for PTP Service

- ➔ FERC eliminates the pricing cap for reassignment of transmission capacity by all transmission customers – non-affiliates and affiliates.
- ➔ Transmission customers may either request that the transmission provider make the capacity available on its OASIS or the customer may negotiate the assignment on a bilateral basis.

Transmission Capacity Reassignment for PTP Service (cont'd)

- ➔ All assignments must be posted on the OASIS prior to the date that the reassigned service commences.
- ➔ The customer that purchases the reassigned capacity must execute a service agreement prior to the date that the reassigned service commences. (Transmission provider will handle the flow of dollars.)

New Reporting Requirements for Secondary Market

- ➔ Transmission provider must aggregate, summarize and report the service agreements for capacity reassignments in the quarterly EQRs.
- ➔ Commission directs Staff to closely monitor EQRs and development of the secondary market to identify any problems or exercises of market power.
- ➔ After two years of EQR reporting, Commission directs Staff to prepare a report regarding the development of the secondary market.



REDISPATCH SERVICE

Redispatch Service – Terms And Conditions

- ➔ FERC modified the OATT obligation to redispatch generation to accommodate transmission requests.
 - Redispatch is required only for long-term firm service requests.
 - Redispatch is not required if it would impair reliability, including the ability to meet peak load plus reserve requirements.
 - Redispatch no longer must be provided indefinitely if it is cheaper than upgrades.
 - Redispatch capability can be recalculated every two years for customers who do not commit to network upgrades.
 - Redispatch customers have rollover rights.
- ➔ Third party generators are not required to provide redispatch.

Redispatch Service – Pricing

- ➔ Redispatch costs are estimated during the system impact study.
- ➔ Customers pay the higher of the embedded cost of service or the actual redispatch cost, calculated monthly.
- ➔ Alternatively, customers may pay a negotiated fixed rate capped at the sum of the fixed and variable costs of the resources expected to provide the redispatch.
- ➔ Redispatch costs are no longer capped at the cost of expansion.

Redispatch Service – Posting Requirements

- ➔ The transmission provider must post on OASIS:
 - Its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch; and
 - The high and low hourly redispatch cost for the month for each of these transmission constraints.
 - Postings must be made regardless of whether a customer actually pays a redispatch charge.

Redispatch Posting Requirements

- ➔ Redispatch costs are determined by dividing the cost of redispatch by the MWh of transmission that would have been curtailed but for the redispatch.
- ➔ Transmission providers and NAESB must work together to develop OASIS functionality and any standard business practices.

CONDITIONAL FIRM SERVICE



Conditional Firm Service Relationship To Redispatch Service

- ➔ Order 890 considers Conditional Firm Service (CFS) as an alternative to Redispatch Service for a Transmission Customer:
 - Used when long-term (*i.e.*, longer than one year) firm point-to-point service is not available.
 - Used as a “bridge” service while new transmission facilities are constructed; or if the customer does not want to pay for upgrades that are necessary to provide firm service.
- ➔ Customer determines if it wants the Transmission Provider to study Redispatch, CFS or both services.

Conditional Firm Service Relationship To Redispatch Service

(cont'd)

- ➔ If studies show both services are available, the Customer may choose which service it wants.
- ➔ Transmission Provider is required to provide either service only for the time period in which the service(s) can be provided without impairing reliability.

Conditional Firm Service

- ➔ CFS is a modified form of long-term firm point-to-point transmission service that provides for limited interruption for system reliability reasons:
 - during a pre-determined number of hours during the year; or
 - during defined system conditions.
- ➔ Curtailment hours and conditions must be identified in the system study.

Conditional Firm Service (cont'd)

➔ Curtailable hours

- Order 890 allows each Transmission Provider to use its own methodology to determine number of curtailable hours.
- Transmission Provider is allowed to include a risk factor in determining curtailable hours.
- Transmission Customer can be curtailed for any reliability reason during curtailment hours.

Conditional Firm Service (cont'd)

➔ Curtailment conditions

- Based on system reliability conditions.
- Acceptable conditions include, but are not limited to, designation of limiting transmission elements.
- System load level alone is not a sufficient system condition warranting curtailment.
- Transmission Provider may reassess both hours and system condition curtailments every two years for customers who have not committed to pay for upgrades.
 - ✓ Transmission Provider can adopt a longer reassessment period.

Conditional Firm Service (cont'd)

- CFS includes rollover rights if service is for longer than five years, subject to the Transmission Provider's two-year reassessment right for customers who have not committed to upgrades.
- CFS curtailment priority
 - ✓ During curtailment periods CFS is curtailed with secondary network curtailment priority.
 - ✓ During non-curtailment periods CFS is curtailed *pro rata* with firm transmission service.

Conditional Firm Service (cont'd)

- ➔ RTO/ISOs are not required to provide CFS.
 - RTO/ISOs have real-time energy markets that allow customers to buy through congestion.
 - RTO/ISO financial transmission rights could be disrupted by CFS.
- ➔ Conditional Firm Service can be used to import designated network resources from other control areas but not for network service.
 - CFS curtailment is for reliability reasons only, not economic reasons.
 - Only transmission service is subject to curtailment, not the generation itself.

Transparent Dispatch Advocates (“TDA”) Proposal

OATT Redispatch Service

- ➔ Late in the rulemaking process, TDA (PJM, IPPs and wind generation) submitted comments.
- ➔ TDA advocated a “minimum functional unbundling” of the transmission provider’s redispatch service.

TDA Proposal

- ➔ Although FERC called it unclear, inconsistent, and a moving target, the TDA proposal appeared to require a transmission provider to:
 - Publicly post the real-time cost of providing redispatch service from the transmission provider's generators;
 - Accept voluntary, market-based bids from third party generators that choose to offer and are capable of providing redispatch service in the transmission provider's control area; and
 - Provide real-time redispatch, based on transmission provider's cost-based bids and third party generators' market-based bids.

TDA Proposal (cont'd)

- ➔ Real-time redispatch would be used to respond to transmission constraints on the transmission provider's system or, in the case of reciprocal redispatch, to respond to transmission constraints on another transmission provider's system (e.g., PJM).

TDA Proposal (cont'd)

- ➔ TDA intensely lobbied the FERC Commissioners and FERC requested public comments on the TDA proposal.
- ➔ In December and January, TDA and anti-TDA groups intensely lobbied FERC.
- ➔ Final Rule soundly rejected TDA proposal as unnecessary to remedy undue discrimination by transmission providers - with one exception.

TDA Proposal (cont'd)

- ➔ Exception: Transmission providers must modify their OASIS to allow for the posting of third party offers to supply redispatch.
 - This requirement does NOT require transmission providers to incorporate bids from third parties into their redispatch.
 - The third party offers may be used by transmission customers to secure planning redispatch.
- ➔ Final Rule noted that seams issues between RTO and non-RTO markets (for which TDA advocates reciprocal redispatch) are better addressed on a case-by-case basis or in the RTO Border Utility Issues proceeding.
- ➔ Stay tuned...

ROLLOVER RIGHTS

NEW
AND
IMPROVED



The New And Improved Rollover Rights Product

- ➔ Transmission Customer must enter into a minimum five-year service agreement in order to be eligible for Rollover Rights for that transmission service.
- ➔ Transmission Customer must give notice and enter into a new transmission service agreement not less than one year prior to the termination of the existing agreement.
- ➔ The term of the rollover agreement will be the longer of five years or any longer term competing request.

The New And Improved Rollover Rights Product (cont'd)

- ➔ Transmission Customer cannot change its designated resources and receipt points and still retain its Rollover Rights for that transmission service; rollover rights are re-evaluated on the new path.
- ➔ Rollover restrictions based on anticipated reasonable load growth or preexisting contracts must be included in the initial transmission service agreement.
- ➔ New Rollover Rights become effective when the Transmission Provider's (including RTOs/ISOs, if applicable) coordinated and regional planning process is accepted by the Commission.

STANDARDIZATION OF RULES AND PRACTICES



Standardization of Rules and Practices

- ➔ What should be in the OATT?
 - FERC adopts the NOPR proposal to continue to require only those rules, standards and practices that “significantly affect” transmission service to be filed in the OATT.
- ➔ What should be publicly posted?
 - Transmission providers must post on their public websites all rules, standards and practices for transmission service and provide a link to that posting on the OASIS.
 - The posting must include a statement of the process by which the transmission provider will amend rules, standards and practices. The process must provide reasonable notice of changes.

Standardization of Rules and Practices (cont'd)

➔ Creditworthiness Provisions

- Transmission providers must file a new Attachment L in the OATT.
- Attachment L must specify the qualitative and quantitative criteria the transmission provider uses to determine levels of secured and unsecured credit it requires from transmission customers.
- The transmission provider may supplement Attachment L by posting greater detail in a credit guide or manual on its OASIS.



DESIGNATION OF NETWORK RESOURCES

What Qualifies As A Network Resource?

- ➔ Firm liquidated damages contracts, such as the EEI Firm LD product and the WSPP Schedule C agreement, qualify as network resources.
 - Contracts qualify if they may not be interrupted for economic reasons but specify damages for failure to perform.
 - Only “make whole” LD provisions qualify; LD provisions that fix damages or cap them do not qualify.

What Qualifies As A Network Resource? (cont'd)

- ➔ Designations of off-system resources must include the amount of power, the control areas from which power will flow and the points of delivery to the transmission provider's system.
- ➔ Information on operating restrictions and variable costs (for redispatch) must be posted and masked.

What Qualifies As A Network Resource? (cont'd)

- ➔ Contracts that are interruptible for reliability reasons or to serve native load qualify as network resources.
 - The WSPP Schedule C Agreement must be modified because it permits interruption for reasons other than service to native load.
 - The contracts will be grandfathered until they expire or are redesignated following undesignation.

Other Rules For Network Resources

- ➔ Transmission providers must verify the firmness of third party transmission.
- ➔ Network customers (not transmission providers) must certify the eligibility of generation and purchases as network resources.
- ➔ Network resources may be temporarily undesignated for specified periods to make third party sales without losing ATC rights.

Other Rules For Network Resources (cont'd)

- ➔ Undesignations are made on OASIS by no later than 10 AM of the day before service commences; service agreements need not be amended.
- ➔ Undesignations and new point-to-point reservations may be evaluated together, but the point-to-point requests do not have queue priority.

Secondary Network Service

- ➔ The Commission did not adopt the proposed restriction on secondary service to economy energy purchases. Secondary service can be used to import any energy for native load or network customers.
- ➔ The Commission retained its prohibition on the use of secondary service to serve third party loads.

Hourly Firm Service

- ➔ Order 890 does not adopt an Hourly Firm Service requirement.
 - Concerns about possible adverse effect on reliability
 - Complexity and inefficiency in scheduling and administering the service
- ➔ Transmission Providers retain Section 205 rights to propose Hourly Firm Service.

PRIORITY OF SERVICE REQUESTS



Pre-Confirmation Priority

- ➔ FERC did not adopt its proposal to give priority to all pre-confirmed requests.
- ➔ Pre-confirmation does not affect the priority of requests for long-term service.
- ➔ For requests for short-term firm and non-firm service, longer-term requests have priority, with pre-confirmation as a tie-breaker and price as a subsequent tie-breaker. A potentially-displaced shorter-term request still has the right of first refusal to match a longer-term request or a higher-priced request.

Simultaneous Requests For Service

- ➔ A transmission provider that limits how early a request for service may be submitted must include the limit in its OATT and adopt a window within which all requests for service are deemed to be submitted simultaneously.
- ➔ This requirement may apply to all transmission providers with respect to non-firm service (see OATT Section 18.3).
- ➔ The transmission provider must propose a method of allocating capacity if ATC is not sufficient to supply all simultaneous requests.