

Treatment of Matching Requests

FERC, in establishing the tariff language, indicated that a higher priority request may preempt lower priority requests, with one caveat that prevents the preemption. They established a process with the express purpose of allowing a customer with lower priority service to match the longer duration before losing its reservation priority. The matching request is the OASIS tool that was established to enable the customer with the lower priority request to retain its reservation priority. The higher priority customer has the rights unless blocked by a customer who exercises ROFR. There is no thought expressed in the tariff language to indicate that the matching requests' ultimate status is to be tied in any way to partial capacity offerings to the higher priority request. The subcommittee should recognize that the express purpose of the Matching Request is to retain reservation priority by the lower priority customer. Once exercised, it should stand as a valid decision.

Pro forma OATT Section 3.2(iii)

If the Transmission System becomes oversubscribed, requests for service may preempt competing reservations up to the following conditional reservation deadlines: one day before the commencement of daily service, one week before the commencement of weekly service, and one month before the commencement of monthly service. Before the conditional reservation deadline, if available transfer capability is insufficient to satisfy all requests and reservations, **an Eligible Customer with a reservation for shorter term service or equal duration service and lower price has the right of first refusal to match any longer term request or equal duration service with a higher price before losing its reservation priority.** A longer term competing request for Short-Term Firm Point-To-Point Transmission Service will be granted if the Eligible Customer with the right of first refusal does not agree to match the competing request within 24 hours (or earlier if necessary to comply with the scheduling deadlines provided in section 13.8) from being notified by the Transmission Provider of a longer-term competing request for Short-Term Firm Point-To-Point Transmission Service. When a longer duration request preempts multiple shorter duration reservations, the shorter duration reservations shall have simultaneous opportunities to exercise the right of first refusal. Duration, price and time of response will be used to determine the order by which the multiple shorter duration reservations will be able to exercise the right of first refusal. After the conditional reservation deadline, service will commence pursuant to the terms of Part II of the Tariff.