



Transmission Services

Scheduling Transmission Services, Version 8

Response to Customer Comments

Posted: April 17, 2012

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Scheduling Transmission Service, Version 8, Business Practice posted for review from January 27, 2012 through March 5, 2012.

Thank you for your comments.

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1. Powerex

Powerex has the following comments on the Scheduling Transmission Service Business Practice, Version 8:

BPA has modified Section A.1.I. General Procedure and Requirements, Submitting Transmission Schedules, to read: *Transactions on the DC Intertie, other than those described in the Intra Hour Scheduling Pilot Program Business Practice, may be changed in-hour only in response to a Transmission reliability event.*

With respect to section A.1.I, BPA is explicitly saying that energy cannot be scheduled on the DC intertie if there is an expectation that the transaction may be reduced in the hour for reasons other than a Transmission reliability event. It seems clear that transactions that may be subject to non-transmission related changes would include 1) energy transactions that may be changed for economic reasons; 2) ancillary service transactions (e.g. non-spinning reserves); and 3) energy transactions that are not backed by sufficient balancing or regulating reserves to keep the transaction unchanged for the entire scheduling period. Powerex requests that BPA clarify this understanding of section A.1.I.

Transmission Services' Response

The intended effect of this business practice is to prevent or minimize the reliability impacts from in-hour energy profile changes for non-transmission events. BPA has identified the potential for in-hour, non-transmission related energy profile changes to pose/create/cause reliability issues such as causing a change to the configuration in-hour, which can create issues on the DC.

This restriction would apply to any schedule on the DC Intertie that, but for the restriction in this business practice, would allow a customer to change the energy profile of such tags

within hour. It would not apply to other schedules that lack this feature. The resulting effect is that only BPA, not the customer, may change within hour energy deliveries for DC Intertie schedules for transmission reasons, regardless of the type of tag submitted.

BPA agrees with Powerex that energy transactions now scheduled on the DC Intertie may be subject to non-transmission related changes. And Powerex is correctly characterizing most of BPA's proposed change in scheduling policy.

If a Balancing Authority has clear methodologies with proven accuracy for calculating reserve needs, once those reserves have been deployed curtailing e-Tags is part of the mitigation of the reliability event.