



Transmission Services

Failure To Comply, Version 10

Response to Customer Comments

Posted:

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Failure To Comply, Version 10 Business Practice posted for review from August 8th, 2014 through September 15th, 2014

Thank you for your comments.

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Southern California Edison

Southern California Edison (SCE) appreciates the opportunity to comment on Failure to Comply Version 10, Business Practice. If you have any questions, please contact: Danphy Wong, (626) 302-3763, danphy.wong@sce.com

SCE recommends the buffer volume be increased from the current 100-kWh in Section B.5.d. Having such a small deviation band promotes under-generating given the severity of the charge associated with a FTC charge. Therefore, SCE recommends that the buffer volume be increased to 2MWh.

Transmission Service's Response

Iberdrola Renewables'

Iberdrola Renewables appreciates the opportunity to provide comments on Bonneville's Failure to Comply Business Practice Version 10. Given the significant penalties involved with Bonneville's Failure to Comply (FTC) Business Practice and the limited time provided for parties to prepare for the proposed changes, Iberdrola Renewables requests the following:.

Penalty Grace Period: Iberdrola Renewables requests Bonneville implement a 60-day grace period between the October 1, 2014 implementation date and the date when FTC penalties will be assessed. Market participants will require time to test their systems and processes to ensure they operate as designed under the new FTC Business Practice and should not be subject to punitive penalties during this initial period.

Transmission Service's Response

Elimination of the "Touch Line" Rule: Iberdrola Renewables requests Bonneville eliminate the "touch line" requirement that exists during a down ramp (when the next schedule interval's FTC is below the current interval). Iberdrola Renewables schedules twelve wind facilities into Bonneville's system each hour. Manually managing curtailment set points on a fifteen minute basis simply isn't possible. Iberdrola has developed an automated solution that, while not ideal given generation will inevitably be lost, should help the company to avoid FTC penalties. This solution cannot, however, ensure the company's avoidance of FTC penalties during downward ramping scheduling intervals given the "touch line" requirement. It is not possible for Iberdrola to program its systems to comply with curtailments and avoid FTC penalties with the existence of this requirement. Iberdrola understands Bonneville included the "touch line" rule to preclude potential gaming of market participants. Rather than penalize all market participants to manage a remote risk of bad behavior, Iberdrola believes Bonneville should eliminate the "touch line" requirement, monitor market participant behavior, and address suspected gaming on a case-by-case basis.

Transmission Service's Response

Curtailment Flag Implementation: Iberdrola Renewables operates generation assets in all major markets across the United States. In every other market a curtailment flag is communicated via ICCP when a generation facility is under active curtailment. The existence of a curtailment flag would enable improved SCADA programming to more accurately follow changing set points and avoid FTC penalties. Bonneville issues curtailment flags today to individual generators when the BAA experiences an SOL event. Iberdrola Renewables requests Bonneville mirror this curtailment flag programming for other types of curtailment events on its system.

Transmission Service's Response

Next Interval Schedule Quantity in iCRS: Iberdrola Renewables requests Bonneville add each generator's next interval schedule quantity as a new field in iCRS and also make this value available to participants via ICCP. Iberdrola understands this may be a longer-term initiative given the required programming changes in iCRS, but believes Bonneville should work to provide this information to assist market participants to better manage and automate response to curtailment directives.

Transmission Service's Response

Power Services

General Criteria 1. "(e.g., though" change "though" to "through".

Transmission Service's Response

Examples of Failure to Modify Generation Output. Chris heard that we needed a lead in to his graphs so we might not need to provide a comment here.

Transmission Service's Response

Tenaska Power Services Co.

What is the start date of Failure to Comply, version 10? (The current Business Practice is marked "Effective: TBD".)

Transmission Service's Response

When will the FTC penalty price effective 10/1/14 be known/available?

Transmission Service's Response

In the table "Examples of FTC evaluation start time", please explain the formulas used to determine Begin Time in the first two examples.

Transmission Service's Response

In Section E, Examples 1 and 2, what does the dashed red line represent? There is no dashed red line in the legend.

Transmission Service's Response

In Section E, Examples 1 and 2, could BPA provide more explanation of why FTC is/isn't assessed for each interval in the examples?

Transmission Service's Response

In Section E, Example 1, is "FTC" around 18:07 a valid label? We remember the presenter in the related conference call noting that one label was invalid - was this the one?

Transmission Service's Response

In Section E, Example 1, what is the FTC Level for Interval C?

Transmission Service's Response

In Section E, Example 3, what are the units used on the x axis in the graph? Minutes before/after the hour?

Transmission Service's Response

Are there any other examples with begin times, graphs, calculations of FTC penalties, etc.?

Transmission Service's Response

Puget Sound Energy, Inc

Puget Sound Energy, Inc. ("PSE") respectfully submits these comments on the Draft Failure to Comply Business Practice, Version 10 (the "Draft Business Practice"). PSE appreciates the opportunity to comment on the Draft Business Practice and looks forward to working with BPA and others in the region with respect to the Draft Business Practice.

Determination of the Number of Intervals Within an Hour

Section A.3 of the Draft Business Practice states as follows:

The shortest schedule interval submitted for the hour will be used to determine the number of intervals within an hour. For example if one 15-minute schedule is

submitted within an hour then all of the scheduling intervals for the hour will be broken into 15 minute schedule interval. Likewise, if a 30 minute schedule is submitted within the hour then the hour will be broken into two 30 minute scheduling intervals.

Draft Business Practice as Section A.3. The first sentence in this Section A.3 is ambiguous as to who is the submitter with respect to the determination of the number of intervals within an hour. PSE suggests the following revision to Section A.3 to clarify that the shortest schedule interval submitted for the hour by a generator will be used to determine the number of intervals within an hour for that generator:

The shortest schedule interval submitted for the hour by a generator will be used to determine the number of intervals within an hour for that generator. For example if a generator submits one 15-minute schedule is submitted within an hour then all of the scheduling intervals for the hour will be broken into 15 minute schedule interval for that generator. Likewise, if a generator submits one 30 minute schedule is submitted within the an hour then the hour will be broken into two 30 minute scheduling intervals for that generator.

These suggested revisions clarify that each generator will determine the number of intervals

[Transmission Service's Response](#)

Definition of the "Touch Line" Rule

Section A.4 of the Draft Business Practice states as follows:

To establish the sum of schedules during ramping periods between scheduling intervals, the higher of the current interval FTC Level or the next interval FTC Level will be extended for the ramp time during the ramp when assessing the application of the Failure to Comply penalty charge. When the next schedule interval's FTC Level, as described in Section B.5.b for generation and Section C.2 for load, is lower than the current interval (a down ramp) the resource must be operating at or below the FTC Level of the next period for 1 minute following the end of the response time or ramp to that interval to avoid the application of the FTC penalty (the "touch line" rule).

Draft Business Practice as Section A.4. The phrases "next period," "end of the response time," and "ramp to that interval" in the last sentence of Schedule A.4 are ambiguous. It is unclear (i) whether the "next period" refers to the "next schedule interval" or some other period; (ii) what is meant by the "response time"; and (iii) whether the interval in the phrase "ramp to that interval" refers to the "next schedule interval" or some other interval.

[Transmission Service's Response](#)

Examples of the "Touch Line" Rule

Section E.4.a of the Draft Business Practice states as follows:

Example 3 shows a curtailment order being issued at 40 minutes into the hour to start at 40 minutes into the hour. There is then a 10-minute period, from the time the curtailment order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the curtailment. This example shows the generation of three generators. Generator #3

is assessed Failure to Comply for not operating at or below the FTC Level of the next period for 1 minute following the end of the response time or ramp to that interval (“touch line”).

Draft Business Practice as Section E.4.a. The phrases “next period,” “end of the response time,” and “ramp to that interval” are identical to those used in Section A.4 of the Draft Business Practice and, therefore, contain the same ambiguities identified above.

Transmission Service’s Response

PSE appreciates the opportunity to comment on the Draft Business Practice.

PGE

Section A.3 states “the shortest interval submitted for the hour will be used to determine the number of intervals within an hour.” PGE requests clarification regarding whether this language intends to capture intervals submitted because of curtailment and Redispatch.

Transmission Service’s Response

Section A.4 uses the term “touch line rule.” PGE requests BPA provide a definition of this term in the business practice.

Transmission Service’s Response

B.1.c.i & ii is covers a complex topic and PGE appreciates BPA’s efforts to provide such a thorough explanation of the FTC rule in this section.

Transmission Service’s Response