



Transmission Services

Committed Scheduling for the 2014-2015 Rate Period Business Practice, Version 1

Response to Customer Comments

Posted: July 5, 2013

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Committed Scheduling for 2014-2015, Version 1, Business Practice posted for review from March 28, 2013 through April 25, 2013.

Thank you for your comments.

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1. Portland General Electric

Portland General Electric Company (PGE) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) proposed Committed Scheduling for 2014-2015 Rate Period, Version 1 business practice. As a participant in the Committed Intra-Hour Pilot Program, PGE has exceptional depth of knowledge with the proposed business practice over the past year and a half.

- A. For participants in the Committed 30/60 Scheduling there may be times when the participant has the ability and desire to schedule on a 30/30 Scheduling basis. In PGE's experience during periods of high wind plant output volatility the ability to schedule at 30 minute intervals provides prudent and worthwhile assistance to BPA and the region with regards to reserve capacity. To the extent that 30/60 scheduling participants are interested and capable of providing voluntary assistance, the business practice accuracy metrics should align for that purpose.

PGE would like to recommend that BPA revise section F. 2. as follows:

a. BPA will verify on an ongoing basis that the hourly schedule used is at least as accurate as the 30-minute persistence signal for the 60 minute interval provided through iCRS. The baseline metrics for accuracy comparison shall include a capacity, energy, and accumulated energy component. Any 30/60 Scheduling customer shall not be penalized with a deviation should they choose to schedule according to the 30 minute persistence value for 30 minute scheduling.

b. 30-Minute Persistence Signal for 60-minute Scheduling (Committed 30/60): The generator's schedule for the next schedule interval is the generator's 1-minute average of the actual generation 30 minutes prior to the hour. For example, the generator's schedule for 2:00 to 3:00 is the generator's actual average generation from 1:29 to 1:30. Through iCRS Generation Advisor, BPA will provide the average generation value that we will use for determining scheduling accuracy performance every 30 minutes. The average value will be updated within 1 minute after H-x:30 and H-x:00. BPA will measure 30/60 scheduling participants according to the H-x:30 value for metric accuracy.

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g. A Committed 30/60 Scheduling Participant scheduling to the BPA-provided H-x:30 value for every 60-minute schedule interval will satisfy the schedule accuracy metrics for capacity, energy, and accumulated Energy Imbalance. If a 30/60 entity submits a schedule according to the 30/30 scheduling persistence value any failure of that scheduling interval shall be automatically waived.

Transmission Service's Response

Bonneville recognizes there may be benefits of customers submitting schedules at a performance level better than their elected therefore BPA will measure a participants performance at the level at the least restrictive level they have scheduled to. Failure to perform will not be waived. BPA will add to Section F.2, "If a party that elected 30/60 scheduling chooses to correct their schedule mid-hour, the metric for that schedule interval would be the least restrictive of the 30/30 or 30/60 metrics" to clarify how the metrics would be applied if a Committed 30/60 scheduler elects to adjust their schedule mid-hour using the H-x:00 value.

- B. PGE endorses the changes to section H.3. However, given PGE's recent difficulties attempting to initiate the automated scheduling process, we suggest the following language adjustment;

3. After BPA issues two such unwaived failures of a schedule interval for a single performance metric over a 30-day period, the next notice will require the committed scheduling participant to automate scheduling to the BPA-provided persistence value in a manner consistent with applicable DOE cyber security standards. Upon receipt of a notice with this requirement, the committed scheduling participant must notify BPA of its intent to comply within ~~two~~ five Business Days, and execute the change in its scheduling systems within ~~two weeks~~ one month of receiving BPA's new signal. During the intervening period the committed scheduling participant is expected to exercise due diligence to continue to achieve the expected scheduling accuracy.

PGE appreciates the opportunity to comment on the proposed Committed Scheduling for 2014-2015 Rate Period, Version 1 Business Practice. PGE believes these proposed language changes will provide clarity to the metrics and allows participants willing to assist BPA by scheduling more accurately and improve reliability in the region to do so without the fear of failing applicable metrics. The proposed adjustment to the failure notification language will ensure that those participants either choosing to use an automated process or required to do so, have sufficient time to deploy the complex process in a reasonable timeframe. In PGE's experience the added flexibility provided to participants may provide additional operational efficiency to the proposed business practice.

Transmission Service's Response

BPA concurs with the change from two days to five days.

BPA will extend the time period for customers to execute changes in their scheduling system starting after the customer receives the new signal from BPA to one month. BPA will also add the following language to Section H.3 to address actions BPA may take if it observes that the customer has stopped routinely scheduling to the signal provided:

If BPA observes during the intervening period that a party is frequently missing the scheduling accuracy metrics more than once per week or appears to have stopped routinely scheduling to the signal provided, BPA may notify the customer of the temporary suspension of the discount for Committed Scheduling, which would commence the first day of the following month and continue until automated scheduling is successfully implemented.

2. Southern California Edison

A. F. Scheduled Accuracy Metrics

Comments:

Add the following sentence in Section F.1.b:

“In the event BPA does not update the average value within one minute after of H-x:30 or within one minute of H-x:00, BPA will exclude the respective schedule interval from the scheduling accuracy metrics.”

Transmission Services' Response

Due to different customers needs to pick up the BPA provided signal BPA will amend Section F.1.b to the following:

“In the event BPA does not update the average value within 2 minutes of H-x:30 or H-x:00, BPA will deem this a BPA system failure in accordance with Section E.4 of this business practice.”

B. Add the Following sentence in Section F.2.b:

“In the event BPA does not update the average value within one minute of H-x:30, BPA will exclude the respective schedule interval from the scheduling accuracy metrics.”

Transmission Services' Response

Due to different customers needs to pick up the BPA provided signal BPA will amend Section F.2.b to the following:

“In the event BPA does not update the average value within 2 minutes of H-x:30 or H-x:00, BPA will deem this a BPA system failure in accordance with Section E.4 of this business practice.”

3. Puget Sound Energy

A.

RE: Comments of Puget Sound Energy, Inc. on the Committed Scheduling for the 2014-2015 Rate Period, Version 1, Business Practice

Puget Sound Energy, Inc. (“PSE”) respectfully submits these comments on the proposed Committed Scheduling for the 2014-2015 Rate Period, Version 1, Business Practice (the “Committed Scheduling Business Practice”). PSE appreciates the opportunity to comment on the Committed Scheduling Business Practice and looks forward to working with Bonneville Power Administration (“BPA”) and others in the region with respect to the two committed scheduling options available for customer election in the 2014-2015 rate period.

B.

Section B.1.d. of the Committed Scheduling Business Practice

Section B.1.d. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

Inform BPA about the methods by which the potential participant expects to achieve scheduling accuracy that is consistent with or superior to the schedule error metrics described below in section F. BPA will apply the same performance metric regardless of the scheduling method used.

Committed Scheduling Business Practice at page 2. BPA should either waive or significantly shorten the prequalification period for potential committed scheduling participants that schedule in accordance with the BPA signal. Schedules submitted by potential committed scheduling participants that schedule in accordance with the BPA signal will, by definition, achieve scheduling accuracy that is consistent with or superior to the schedule error metrics described below in section F of the Committed Scheduling Business Practice. Therefore, a prequalification period of two weeks is unnecessary for these participants, and BPA could use this period for other purposes, such as testing connections and protocols.

Transmission Services' Response

It is envisioned by BPA that the two week period includes signal implementation, testing of connections and protocols and potentially other actions. At the end of the two week period the rate discount is available to the committed scheduling participant. The committed scheduling participant will need to have demonstrated they can meet the performance requirements consistently to receive that discount.

C.

Section B.1.e. of the Committed Scheduling Business Practice

Section B.1.e. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

Prior to BPA allowing a customer to receive the applicable rate associated with Committed Scheduling, the potential participant must demonstrate for at least two calendar weeks its ability to meet the scheduling accuracy metric, regardless of whether the resource is new or existing.

Committed Scheduling Business Practice at page 2. BPA should delete the phrase “at least” from Section B.1.e. of the Committed Scheduling Business Practice, which introduces uncertainty with respect to the prequalification requirements. BPA should instead require potential participants to prequalify for a defined period (i.e., two calendar weeks) rather than an undefined period.

Transmission Services’ Response

The phrase “at least” is to provide any additional time a committed scheduling participant may need to meet the performance metrics on a consistent basis. If this flexibility is removed there could be occasions where a potential committed scheduling participant may not be able to meet the metrics in time to join the program. Bonneville does not want to limit participation because a resource is working through implementation issues.

D.

Section B.1.f. of the Committed Scheduling Business Practice

Section B.1.f. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

The Uncommitted Scheduling VERBS Base Rate (Section III.E. 2 of BPA's ACS-14 rate schedules) will apply during the period that the potential participant is providing prequalifying information to BPA and demonstrating the ability to meet the scheduling accuracy metric. If the potential participant demonstrates its scheduling ability during September of 2013 (see section G), the applicable VERBS rate from ACS-12 rate schedule will apply during that month.

Committed Scheduling Business Practice at page 2. BPA should amend section B.1.f. of the Committed Scheduling Business Practice to allow potential participants that satisfy requirements for Committed 30/30 Scheduling and Committed 30/60 Scheduling during the prequalification period to receive the Committed 30/30 Scheduling VERBS Base Rate and Committed 30/60 Scheduling VERBS Base Rate during the prequalification period. If potential participants satisfy the requirements for the reduced rates during a period, then they should pay the reduced rate for such period.

Additionally, BPA may receive many prequalification requests for September 2013, and the volume of the requests may require additional time to process. BPA should commit that prequalification periods that begin on or before September 10, 2013, will receive the VERBS rate from ACS-12 rate schedule for the duration of the prequalification period, even if the prequalification period extends beyond October 1, 2013, for reasons outside the control of the potential participants.

Transmission Services' Response

During the prequalification period BPA is holding the reserves required for an uncommitted scheduling option, therefore the uncommitted rate will apply.

Section G.1 of the Committed Scheduling BP provides for the notification of qualification and acknowledgment requirements for the resource to receive the rate for the elected scheduling option. It states the rate will take effect at the start of the next billing period after acknowledgement.

The VERBS rates charged will be in accordance with the rates and business practices in effect at the time the service is being provided to variable energy resource balancing service customers.

E.

Sections E.1, E.3, and E.4 of the Committed Scheduling Business Practice

Sections E.1, E.3, and E.4 of the Committed Scheduling Business Practice states that, in the event of a generation limit, schedule curtailment, or iCRS system error, BPA will exclude the “subsequent scheduling interval” from scheduling accuracy metrics. The “subsequent scheduling interval” will be 60 minutes for participants in Committed 30/60 Scheduling and 30 minutes for participants in Committed 30/30 Scheduling. BPA should revise these sections to exclude the *two* subsequent scheduling intervals from scheduling accuracy metrics for participants in Committed 30/30 Scheduling. This revision would allow participants in Committed 30/30 Scheduling a full 60 minutes (the same amount of time allowed participants in Committed 30/60 Scheduling) to return to full potential generation by the time of the next persistence measurement.

Transmission Services’ Response

Committed 30/30 schedulers receive a discount on their VERBS base service for their ability to adjust schedules and their output on shorter faster reacting time frames. A resource that would need a full 60 minutes to make necessary adjustments is encouraged to take the committed 30/60 scheduling option.

To make clear the scheduling intervals excluded from scheduling accuracy metrics for generation limits BPA will change the language where appropriate to state “Intervals for which the generation value for the persistence schedule is set while the generation limit is in effect will be excluded from the accuracy metrics”.

F.

Sections F.1.d, F.1.e, and F.1.f of the Committed Scheduling Business Practice

Sections F.1.d, F.1.e, and F.1.f of the Committed Scheduling Business Practice refer to persistence schedules or energy imbalance accumulations “over the last seven days.” BPA should clarify these sections by specifying that the persistence schedules or energy imbalance accumulations are over the last seven *calendar* days.

Transmission Services’ Response

BPA will make the edits suggested above.

G.

Section G.1. of the Committed Scheduling Business Practice

Section G.1. of the Committed Scheduling Business Practice states, in part, as follows:

BPA will notify a potential committed scheduling participant when the potential participant has met the pre-qualification requirements and request written acknowledgment that the terms of this Business Practice will govern participation in Committed Scheduling.

Committed Scheduling Business Practice at page 8. BPA should (i) clarify how BPA will notify a potential committed scheduling participant when the potential participant has met the pre-qualification requirements and (ii) commit to notifying a potential committed scheduling participant that it has met the pre-qualification requirements within three calendar days of such participant meeting such requirements.

Transmission Services' Response

The BP will be updated to note that the customer will be notified by their BPA Account Executive via email.

BPA will adopt a 5 calendar day notice period instead of the suggested 3 days to provided flexibility over weekends and holidays for notifying customers of having met their pre-qualification requirements.

H.

Section H.1. of the Committed Scheduling Business Practice

Section H.1. of the Committed Scheduling Business Practice states, in part, as follows:

If the committed scheduling participant's scheduling accuracy does not meet the Scheduling Accuracy Metrics, BPA will notify the committed scheduling participant within 10 Business Days by written notice. Upon receipt of such notice, the committed scheduling participant is expected to correct the scheduling accuracy within one Business Day.

Committed Scheduling Business Practice at page 8. BPA should clarify that a participant whose accuracy does not meet the metrics in the intervening period between the initial failure and the time the participant receives written notice from BPA is assessed only one failure and not multiple failures. BPA could achieve such a result by specifying that the period commencing at the time of the initial metric inaccuracy and ending one business day after receipt by the participant of the BPA notice is a single error.

Transmission Services' Response

It is the responsibility of the committed scheduling participant to meet the metrics for their elected scheduling interval. Each metric failure will be treated as individual events. Section H.2 provides the customer the ability to request a waiver for failures outside of the control of the committed scheduling participant.

I.

Section H.3. of the Committed Scheduling Business Practice

Section H.3. of the Committed Scheduling Business Practice states, in part, as follows:

After BPA issues two such unwaived failures of a schedule interval for a single performance metric over a 30-day period, the next notice will require the committed scheduling participant to automate scheduling to the BPA-provided persistence value in a manner consistent with applicable DOE cyber security standards.

Committed Scheduling Business Practice at page 8. BPA should clarify that the phrase “over a 30-day period” refers to a “*rolling 30 calendar day period.*”

Transmission Services' Response

BPA will adopt the language proposed above.

J.

Sections H.4. and H.5. of the Committed Scheduling Business Practice

Section H.4. of the Committed Scheduling Business Practice states as follows:

BPA may initiate moving a committed scheduling participant to a longer scheduling option as defined in VERBS Base Rate Section III.E.2 of the ACS-14 rate schedule upon failure to automate scheduling or on the third unwaived failure of performance.

Committed Scheduling Business Practice at page 8 (italics added). Section H.5. of the Committed Scheduling Business Practice states as follows:

The Participant will be billed for Uncommitted Scheduling at the start of the next billing cycle if the Participant fails to convert to automated scheduling of the BPA-provided persistence value within two weeks of receiving the new signal from BPA. Termination will take effect on the last day of the current billing cycle.

Id. These two sections appear inconsistent with each other. Section H.4. appears grant BPA the option to move a committed scheduling participant to a longer scheduling option upon a failure to automate scheduling, whereas section H.5. appears to require BPA to bill a participant for Uncommitted Scheduling if the participant fails to convert to automated scheduling within two weeks of receiving the new schedule . Thus, it appears that section H.5. requires BPA to take an action that section H.4. suggests is within BPA's discretion. If this is true, then section H.4. (and sections H.7. and H.8., each of

which expands upon section H.4.) is superfluous. BPA should clarify this apparent inconsistency.

Transmission Services' Response

Section H.4 and H.5 are intended to lay the framework for the process to changing scheduling options when a resource fails to meet the scheduling accuracy requirements detailed in this BP. Section H.5 is to address the timing for changes in billing. Section H.5 will be updated to say "The Participant will be billed at the VERBS base rate for the *next longer scheduling option at...*"

Conclusion

PSE respectfully requests that BPA modify the Committed Scheduling Business Practice in accordance with the edits and clarifications suggested in these comments. As stated above, PSE appreciates the opportunity to comment on the Committed Scheduling Business Practice and looks forward to working with BPA and others in the region with respect to the two committed scheduling options available for customer election in the 2014-2015 rate period.