



## Transmission Services

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### Generation Imbalance Service, Version 11

#### Response to Customer Comments

Posted:

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Generation Imbalance Service, Version 11 Business Practice posted for review from August 8<sup>th</sup>, 2014 through September 15<sup>th</sup>, 2014

Thank you for your comments.

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## Portland General Electric

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Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) various business practice changes to implement fifteen minute scheduling. As a Point-to-Point (PtP) transmission customer, remote generation owner, and active market participant, PGE has considerable interest in these business practices. With this document, PGE hereby provides recommendations for consideration on BPA's proposed Redispatch and Curtailment Procedures and Generation Imbalance Service.

In A.5.a, BPA indicates that generation imbalance is determined on the shortest schedule submitted for the resource. PGE would like clarification on how generation imbalance accounting occurs in a specific instance. If BPA curtails a resource schedule on the first interval of the hour but not the subsequent intervals, will BPA account for subsequent intervals individually? Alternatively, will the original scheduling interval of one hour define the generation imbalance accounting?

### Transmission Service's Response

An intra-hour schedule change will result in the settlement of Generation Imbalance on the shortest schedule interval that occurs within an hour. The cause of the schedule change is not evaluated. Using the example provided, a BPA Transmission Services curtailment for the first 15-minute interval of an hour will result in the settlement of Generation Imbalance over four 15-minute intervals for the hour.

In B.8, the business practice uses the term, "BPA schedule value" and refers the participant to the Committed Scheduling Business Practice. However, revision 5 of that business practice does not specifically define "BPA schedule value" only the "schedule value". If the two terms are synonymous, PGE requests that BPA clarify that in the business practice. . PGE suggests adding a footnote to the Generation Imbalance Service business practice that either restates the definition or provides a specific citation to the definition.

### Transmission Service's Response

Both the Generation Imbalance and Committed Scheduling business practices will be updated to use the term BPA provided schedule value. The section reference will also be added to the Generation Imbalance business practice.

In C.5 BPA states, "If BPA Transmission Services does not inform the Customer that its request for waiver is approved within the 90 day timeframe, the request is considered denied." PGE suggests BPA revise this statement to "BPA Transmission Services will inform the Customer within 30 days of receipt of a request for waiver." PGE believes that providing a response in this fashion limits uncertainty for customers regarding waiver requests and enhances

### Transmission Service's Response

BPA is unable to shorten the turn around time of 90-days for waiver requests, however, BPA will edit the business practice to provide notice of approval or denial of a waiver request.

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## Power Services

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Second paragraph - Change “15-minute schedules” to “interval schedules”

### **Transmission Service’s Response**

The use of interval within the 15-minute scheduling implementation project has created confusion with this and several other business practices. The term “schedule period” will be used through-out the business practice.

Page 2, 5. a. - Change “intra-hour” to “interval” to read “If there is an interval schedule for the generator, imbalance accounting will be on the shortest schedule period submitted during the hour.”

### **Transmission Service’s Response**

The term “interval” commonly refers to schedule periods of which there is a 1-hour schedule period. This provision is specifically referring to those schedule periods that are within 1-hour and not the 1-hour schedule period itself. BPA Transmission Services believes that intra-hour is the correct use in this context.