



Transmission Services

Redispatch and Curtailment Procedures, Version 10

Response to Customer Comments

Posted: 10/17/2014

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

Thank you for your comments.

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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.

Throughout the business practice revision process, BPA refers to a "managed path". Because the term is not a recognized NERC glossary term, PGE suggests that BPA provide a definition of "managed path" in the body of the business practice to provide clarity.

Transmission Service's Response

BPA has added the term "managed path" to the Business Practices Glossary. It is defined as "any network Flowgate, network path or intertie or external interconnection that is managed for reliability reasons."

In A.1.b, the business practice is silent on the number of "future intervals" BPA intends to forecast and ultimately curtail or issue redispatch orders. In the previous version of the business practice, BPA defined the forecasted interval. Because it is still unclear how widespread fifteen minute scheduling will be in the region, PGE suggests that BPA define the scope to the intervals leading to the next hour, thus limiting the uncertainty for future intervals or hours. Alternatively, BPA may provide examples to illustrate the meaning of future intervals for this practice.

Transmission Service's Response

BPA has revised the Business Practice to include more detail on which intervals will be curtailed. The following section has been inserted after Section A.1:

BPA will curtail on a forecast basis approximately 15 minutes prior to the start of each interval and will curtail only the intervals for which the e-Tag scheduling window has closed (i.e., 20 minutes prior to the start time of the interval).

BPA updates B.2.e to read, "Load Serving Entities (LSEs) must re-supply generation from sources that will not further aggravate the constrained managed path or shed load in response to curtailed e-Tags." PGE recommends removing the update. The wording 'further aggravate the constrained managed path' is ambiguous, if BPA intends for the LSE to perform specific actions; PGE suggests breaking B.2.e into a higher-level procedural element with an example.

Transmission Service's Response

BPA believes that this comment refers to C.2.e and will respond accordingly. BPA has reverted to the original language from Version 9, which reads "Load Serving Entities (LSE) must re-supply generation or shed load in response to curtailed e-Tags."

PGE believes that C.4 is unclear as written. PGE suggests a rewording similar to “BPA transmission services will curtail schedules pro-rata and on NERC Curtailment priority basis”.

Transmission Service’s Response

BPA has revised the section to read “BPA Transmission Services will curtail schedules pro-rata according to NERC Curtailment priority.” The same revision has been made in the Scheduling Business Practice for consistency.

BPA changes the term OTC to SOL in Section D of the business practice. Please provide the need and purpose for this change.

Transmission Service’s Response

System Operating Limit (SOL) is the official term used by NERC to mean the value that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. It is used throughout industry reliability standards. Hence, it is also the term used by PeakRC, WECC, NERC, FERC, and all other transmission operators. The term “OTC” is now obsolete.

Power Services

Page 3. 4. Use the same wording (if changed) as in the Scheduling Transmission Service business practice. Potential rewording suggested “Transmission schedules in excess of the Reliability Limit are subject to curtailments on a pro-rata basis, sequentially through the NERC Curtailment priority (i.e., 1-NS, 2-NH, 3-ND, 4-NW, 5-NM, 6-NN (including 6-CF), and 7-F (including 7-FN)).”

Transmission Service’s Response

BPA has revised the section to read “BPA Transmission Services will curtail schedules pro-rata according to NERC Curtailment priority.” The same revision has been made in the Scheduling Business Practice for consistency.