



Transmission Services

Redispatch & Curtailment, Version 9

Response to Customer Comments

Posted: May 21, 2013

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Redispatch & Curtailment, Version 9, Business Practice posted for review from December 3, 2012 through December 31, 2012.

Thank you for your comments.

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1. Powerex

A. Powerex is supportive of any BPA initiative to mitigate unscheduled flows on the transmission system and the associated adverse impacts they can have on BPA's transmission customers. However, it is important that, in addition to these mitigation steps, BPA also investigates the root causes of the unscheduled flows. In particular unscheduled flows on the California-Oregon Intertie (COI) and associated transmission curtailments to BPA firm customers have dramatically risen in 2012. For this reason, it is imperative that BPA act immediately by initiating a customer forum to investigate causes and outline potential solutions which will alleviate the impacts of unscheduled flow on COI to BPA's transmission customers.

Transmission Service's Response

BPA, in a concerted effort with other WECC members, is participating in the WECC's Unscheduled Flow Administrative Subcommittee to investigate why there has been an increase in the amount of Path 66 unscheduled flow curtailment events. BPA believes this is a regional issue that should continue to be addressed by the WECC.

B. Powerex would point out that WECC is presently conducting the Reliability-based Control (RBC) Field Trial, which allows BPA and the other participating BAs to operate with very large Area Control Errors (ACE) while the system frequency is stable. There is growing evidence that these large ACEs may be causing an unprecedented amount of unscheduled flow on the COI, and causing harm to BPA's transmission customers on that path via tag curtailments arising from the WECC Unscheduled Flow Procedures. BPA should act immediately and work with WECC to investigate and resolve this matter in order to reduce unscheduled flow curtailments to firm customers on COI and ensure that the unscheduled flows associated with the RBC Field Trial do not cause further harm to BPA's transmission customers.

Transmission Service's Response

BPA has been operating with RBC as the control standard under the WECC field trial since March, 2010. BPA is going to continue to participate in the field trial in order to insure that the WECC Performance Work Group (PWG) has as much data as possible when evaluating the RBC field trial. BPA does not agree that there is growing evidence that RBC may be causing an unprecedented amount of flow on COI, the studies run so far have been inconclusive. BPA believes any concern with the RBC is a regional issue for WECC to study and resolve.