



Transmission Services

Committed Scheduling, Version 6

Response to Customer Comments

Posted: September 23, 2015

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Committed Scheduling, Version 6, Business Practice posted for review from July 9, 2015 through August 10, 2015.

Thank you for your comments.

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1. Tilghman Associates

A. General Comments:

The proposed revisions to the business practices are intended to implement the Intentional Deviation Penalty see forth in the Generation Inputs Settlement. Tilghman Associates recognizes that BPA has provided wind projects with an efficient mechanism to avoid exposure to intentional deviation penalties – simply by scheduling to the BPA Provided Scheduling Value that applies to its scheduling election. Wind projects seeking to avoid the risk of incurring Intentional Deviation Penalties will likely schedule to this value.

Unfortunately, the proposed business practices as currently drafted may inadvertently and unintentionally create a disincentive for wind projects to experiment with updating their schedules more frequently than required in their scheduling election.

For example, an Uncommitted Project can avoid any risk of intentional deviation penalties by scheduling to the BPA provided scheduling value. As currently drafted, if an uncommitted project elected to schedule to a “better” BPA provided scheduling value (i.e. 30/15; 40/15; or 30/60), the uncommitted project is no longer exempt from Intentional Deviation penalties. While it would be unusual for a project to incur Intentional Deviation penalties by scheduling to a “better” value; that potential risk may unnecessarily create a disincentive for projects to explore scheduling on shorter time periods.

BPA’s business practices should encourage - not discourage - wind projects to experiment and gain experience with shorter scheduling increments. BPA should consider revising the proposed business practices to enable a wind project to schedule to a “better” BPA provided value without any risk of incurring intentional deviation penalties.

[Transmission Service’s Response](#)

[BPA appreciates the general recommendation presented above. Please see below for responses to the specific recommendations for the above example.](#)

B. Specific Recommendations:

1. Add an appendix to each of the business practices exploring examples of the application of the business practices to specific scenarios. The examples relayed by BPA staff during the customer call on July 27 would be a good start.

[Transmission Service’s Response](#)

[Examples for the application of the Intentional Deviation Penalty Charge are included as an attachment to this Response to Customer Comments document.](#)

[See attached Excel file.](#)

2. Add language to the Uncommitted Scheduling business practice providing an

exemption from Intentional Deviation penalties for wind projects that voluntarily schedule to one of the BPA scheduling values set forth in the table in Section E.5 of the draft Committed Scheduling Business Practice.

Transmission Service's Response

In the event that a resource chooses to schedule to a value other than the resources elected scheduling value BPA created a performance exemption in the General Rate Schedule Provisions (GRSP) Section II.H.4. In summary it states a resource that uses a value other than their elected value must meet or beat the imbalance that would have otherwise occurred had that resource schedule to their elected value to be exempt from Intentional Deviation.

Should a resource schedule more frequently than their elected for scheduling program using one of BPA's provided scheduling values it is not likely the resource will incur the Intentional Deviation Penalty Charge under the exemption provided for in the GRSP. The cost of developing a system to evaluate which of the BPA provided values is used by a resource and the on-going cost to continuously monitor such scheduling behaviors outweighs the low likelihood of a resource incurring an Intentional Deviation Penalty Charge under the already provided exemption.

2. Portland General Electric Co. (PGE)

- A. Referring to Section C.2.a., PGE requests that BPA incorporate language regarding the Generation Imbalance Service Deviation Band 2 exemption for Committed Scheduling Resources scheduling under BPA's 30/15 service during the BP-16 rate period.

Transmission Service's Response

The suggested edit has been added even though the exemption is provided for in the Ancillary and Control Area Services Rate Schedule III.b.2.e.

- B. Section E.4.b. inadvertently references Section E.2.b., which does not exist in the current proposed version of the business practice, rather than Section E.3.b.

PGE appreciates the work that BPA puts into creating high quality business practices and the willingness to allow customers to participate in that process. PGE requests a review of the comments provided above and looks forward to BPA's clarifying remarks.

Transmission Services' Response

The reference has been corrected.