



Transmission Services

Failure to Comply, Version 9

Response to Customer Comments

Posted: **May 2, 2014**

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Failure to Comply, Version 9 Business Practice posted for review from April 4th, 2014 through May 2nd, 2014

Thank you for your comments.

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Portland General Electric

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) business practice "Failure to Comply Charge, Version 9". As a Point to Point (PtP) transmission customer and remote generation owner, PGE has considerable interest in this business practice. PGE provides the following recommendations for consideration.

1. PGE notes that section B.3 .a is unclear whether increasing current schedules are considered replacement schedules according to the business practice. Specifically, PGE is uncertain if the revised business practice requires increases in schedules to state the curtailed tag in the Reason field. It is PGE's belief that providing a section for replacement schedules and a separate section for increasing current schedules will provide needed clarity for generators to ensure compliance with the business practice.

Transmission Service's Response

BPA agrees that there is ambiguity in language of B.3.a. To correct it, BPA will revise to read "A replacement schedule can be a new schedule or an increase to current schedule(s) to other Points of Delivery. Each approved replacement schedule must state the curtailed e-Tag number (last 7 digits) in the Reason field."

2. PGE is concerned that section B.3 .a could be confusing with respect to a generator's ability to schedule sub-hourly according to BPA's Scheduling Transmission Service Business Practice. A slight change to the wording in B.3 .a such as "For a scheduling interval an hour when a resource, subject to a curtailed tag, has designated non-curtailed replacement scheduling, when the sum of those replacement schedules are greater than or equal to the sum of the amounts that are curtailed, then the stated curtailment will not generate an FTC Calculation"

Transmission Service's Response

Section B.3.a has been revised to replace hourly with "scheduling period." BPA is still working through how failure to comply will work with 15 minute scheduling. As the business practice is updated the revisions will be sent out for formal comment period.

PGE appreciates the work that BPA puts into creating its transmission service business practices. PGE requests a review of the suggested modifications provided above and looks forward to BP A's clarifying comments

Trans Alta

1. At Section 3.a. "approved replacement schedule[s]" are described. Does e-Tag validation include a screen for realtime curtailments so the replacement e-Tags will be non-curtailed?

Transmission Service's Response

The replacement tag will not be filtered out of future curtailments just because it is a replacement tag. However, if BPA had stopped hourly sales on the curtailed path and a

new TSR was approved on a different path, then the new TSR would be less likely to be curtailed on the original path because it would have had to have a *de minimis* impact on the curtailed flowgate when it was approved.

2. Using Example 6's graph in the BP, it shows how FTC is applied under different replacement e-Tag scenarios. If instead of submitting replacement e-Tags and keeping generation at previous levels (green line), assume the curtailed e-Tag is adjusted down accordingly, such that curtailment on that schedule is no longer necessary.

Using the pink line in the graphic, if the curtailed e-Tag is adjusted down by 8MW, first, the curtailment would no longer be necessary, and second, FTC would not apply. Correct and correct? [Assume in this example that generation would generally follow the schedule down to 32MW (and vary around there imperfectly) instead of hovering around 40MW as shown below.]

Transmission Service's Response

If BPA were to allow a market adjustment to nullify a curtailment and FTC, then there would be no incentive to reduce generation. In fact, the generator would be given credit for overgeneration or even get paid by BPA under Generation Imbalance to ignore the curtailment and maintain generation above its schedule. To avoid FTC, the generator must reduce generation or redirect the curtailed energy in a manner that does not use the curtailed path.