

Failure to Comply, Version 910

Effective: 05/19/2014TBD

The Failure to Comply Business Practice addresses the consequences of non-compliance with Dispatch Orders and how the Failure to Comply Penalty is determined.

Version 10 of the Failure to Comply Business Practice has been revised to implement the assessment of the Failure to Comply penalty charge for 15-minute scheduling.

~~Version 9, Section B.3.a of the Failure to Comply Business Practice has been revised to establish a methodology for generators to submit replacement schedules for curtailed schedules in order to avoid incurring FTC penalty charges. Specifically, when resources submit new schedules or increase existing schedules in amounts that are greater than or equal to the curtailed amount of another concurrent schedule, then the resource will not be subject to FTC penalty charges for that scheduling interval. All new schedules or requested schedule increases must be approved prior to the close of the corresponding schedule window. This is intended to allow resources to re-market or otherwise schedule output in a manner that avoids curtailed transmission paths and avoids incurring FTC penalty charges for generation that exceeds approved schedules. Example 6 has been revised to demonstrate this situation.~~

A. General Criteria

1. Generators within the BPA Balancing Authority Area or which directly interconnect to the FCRTS (e.g., through an Interconnection Agreement, or a Balancing Authority Area Service Agreement) are subject to a Failure to Comply Penalty.
2. Failure to shed load or modify generator output in response to a Dispatch Order will result in a Failure to Comply Penalty charge, except as provided in the following criteria.
3. The shortest schedule interval submitted for the hour will be used to determine the number of intervals within an hour. For example if one 15-minute schedule is submitted within an hour then all of the scheduling intervals for the hour will be broken into 15 minute schedule periodsinterval. Likewise, if a 30 minute schedule is submitted within the hour then the hour will be broken into two 30 minute scheduling periodsintervals.
~~Parties will be assessed for for the Failure to Comply charge when:~~
 - ~~a. The start time of the Dispatch Order is at the start of a scheduling interval, parties have until the later of the end of the scheduling interval ramp or 10 minutes from the Effective Time to shed load or modify generation as directed. Or;~~
 - ~~b. The start time of the Dispatch Order is not at the start of a scheduling interval, parties have 10 minutes from the Effective Time to shed load or modify generation as directed.~~
3. ~~After a Dispatch Order is issued, parties have 10 minutes to shed load or modify generation as directed before becoming subject to a Failure to Comply Penalty.~~
~~For Dispatch Orders issued prior to the start of the hourschedule interval, parties have to the end of the ramp 10 minutes after the start of thetountil the end of the~~

~~ramp for that hour interval to shed load or modify generation as directed before becoming subject to a Failure to Comply Penalty.~~

4. To establish the sum of schedules during ramping periods between scheduling intervals, the higher of the current interval FTC Level or the next interval FTC Level will be extended for the ramp time during the ramp when assessing the application of the Failure to Comply penalty charge. When the next schedule interval's FTC Level, as described in Section B.5.b for generation and Section C.2 for load, is lower than the current interval (a down ramp) the resource must be operating at or below the FTC Level of the next period for 1 minute following the end of the response time or ramp to that interval to avoid the application of the FTC penalty (the "touch line" rule).
- 4.5. Any generator or Customer that is unable to comply with a Dispatch Order due to a *Force Majeure* may not be subject to a Failure to Comply penalty provided that the said generator or Customer notifies BPA Transmission Services Dispatch of the situation immediately (within the 10-minute ramp window) upon the occurrence of the *Force Majeure*.
- 5.6. BPA Transmission Services may request documentation in support of the generators or Customer's assertion of a *Force Majeure*, and the generator or Customer shall provide such documentation within 30 days of BPA Transmission Services' request.
- 6.7. After notifying BPA Transmission Services Dispatch of a *Force Majeure* on their system, the generator or Customer must use best efforts to comply with the Dispatch Order as soon as practicable.
- 7.8. Information to support BPA Transmission Services' determination of a Failure to Comply penalty will be made available, upon request, for up to one year, to a generator or Customer subject to a Failure to Comply penalty.

B. Assessing Generator Penalty for a Failure to Modify Generation Output

1. ~~Generators have 10 minutes after the issuance of a Dispatch Order, except as noted in step 2 below, to fully respond by modifying generation as directed. The start timeEffective Time of theDO a Dispatch Order10-minute window is specified below (rounded up to the next minute).~~
 - a. Dispatch Orders communicated by phone, such as orders to redispatch generation up or down, will include a statement from the BPA Transmission Services dispatcher specifying the time of the Dispatch Order.
 - b. Dispatch Orders communicated by electronic signal, such as direct telemetry or web applications, to limit generation shall use the time stamp of the signal to start the 10-minute window.
 - c. Dispatch Orders communicated by NERC e-Tagging system, such as curtailments of transmission schedules and generation using those schedules, shall use the later of the Start-Time of the Energy Profile of the curtailment or the time stamp of when the curtailment achieves its final state and is APPROVED by all approval parties. An example of an e-Tag's profile and approval history are shown in the screen shots below.
 - i. If the start time of the Dispatch Order is at the start of a scheduling interval, parties have until the later of the end of the scheduling interval ramp or 10 minutes from the the time stamp of when the curtailment achieves its final state and is APPROVED by all parties to shed load or modify generation as directed. Or;
 - ii. If the start time of the Dispatch Order is not at the start of a scheduling interval, parties have 10 minutes from the time stamp of when the curtailment achieves its final state and is APPROVED by all parties to shed load or modify generation as derected.

Examples of FTC evaluation start time

<u>Issue Time of Directive</u>	<u>Start Time of Directive</u>	<u>APPROVED Time of Directive</u>	<u>Begin Time of FTC Evaluation</u>	<u>FTC Rule</u>
<u>:40</u>	<u>:00</u>	<u>:45</u>	<u>:10</u>	<u>Section B.1.c.i - End of Ramp</u>
<u>:55</u>	<u>:15</u>	<u>:00</u>	<u>:20</u>	<u>Section B.1.c.i - End of Ramp</u>
<u>:38</u>	<u>:45</u>	<u>:40</u>	<u>:50</u>	<u>Section B.1.c.i - 10 Minute Window</u>
<u>:12</u>	<u>:12</u>	<u>:13</u>	<u>:23</u>	<u>Section B.1.c.ii - 10 Minute Window</u>
<u>:24</u>	<u>:24</u>	<u>:29</u>	<u>:39</u>	<u>Section B.1.c.ii - 10 Minute Window</u>

Screen Shots of e-Tag profiles

Energy and Transmission Profiles
MW (out of)

	Energy	Transmission	
Start Time	2009-09-03 00:00	2009-09-03 00:00	<input checked="" type="checkbox"/> MW <input checked="" type="checkbox"/> Reservation <input checked="" type="checkbox"/> Trans Total
Stop Time	2009-09-04 00:00	2009-09-04 00:00	<input type="button" value="Enter"/>

Date	Start	Stop	Gen	BPAT			MW
			MW	Trans	10710		
9/03	00:00	15:12	65	65	65	65	
9/03	15:12	15:27	53	65	65	53	
9/03	15:27	16:00	37	65	65	37	
9/03	16:00	00:00	65	65	65	65	
Display MWH Total:			1542	1560	1560	1542	

Approval Status History

Req ID	Request	Company	Type	Origin	Action	Action Time (PDT)	User
1	Curtailment	BPAT	CA	INT	CREATE	2009-09-03 15:12:55	WD-OATI
1	Curtailment	BPAT	CA	INT	APPROVE	2009-09-03 15:12:56	WD-OATI
1	Curtailment				APPROVED	2009-09-03 15:12:56	

2. ~~For a Dispatch Order issued prior to the start of the hourschedule interval, generators have 10 minutes until the end of the ramp after the start of the hour interval in which the curtailment is to become effective to fully respond by modifying generation as directed.~~
- a. ~~If the Dispatch Order issued prior to the start of the hour interval spans consecutive hoursintervals, the 10-minute ramp period after the start of the hour interval does not apply for the consecutive hours.~~
- b.a. ~~Dispatch Orders issued prior to the start of the hour are communicated in accordance with step 1 above.~~

2. In the event that multiple Dispatch Orders are in effect simultaneously (for example, a DSO 216 limit and a Dispatch Order to reduce output), Failure to Comply will be based on the lowest Dispatch Order.

~~2.3.~~ Under circumstances where a wind turbine generating facility is under-generating and BPA Transmission Services curtails that facility's e-Tags under issues a DSO 216 signal to curtail e-Tags due to exhausted balancing reserves, the generator will not be charged a Failure to Comply Penalty if it generates above the sum of the approved e-Tags for the remainder of the interval, unless there are multiple Dispatch Orders (See Section B.2).

~~3.4.~~ Curtailments

- a. In the event of a curtailment, the generator may submit additional schedules (i.e. replacement schedules) or increase current schedules to other Points of Delivery.
 - i. Each approved replacement schedule must state the curtailed e-Tag number (last 7 digits) in the Reason field.
 - ii. The replacement schedules and increases will be processed in accordance with the Scheduling Transmission Service Business Practice.
 - iii. The stated curtailment will not generate an FTC for an hour interval when a resource

1. is, subject to a curtailed tag, and;

2. has designated non-curtailed replacement schedules, and;

~~4.3.~~ when the sum of those replacement schedules are greater than or equal to the sum of the amounts that were curtailed, then the stated curtailment will not generate an FTC calculation.

b. E-Tag curtailments initiated by other Balancing Authorities and approved by BPA Transmission Services are curtailment Dispatch Orders subject to the Failure to Comply Penalty. For more information on curtailments, please refer to the Redispatch and Curtailment Business Practice.

~~b. hour~~

5. Calculating the Failure to Comply Billing Factor

a. Average G_{generation} data for FTC is collected at 1-minute intervals (unless that granularity is not available, in which case the data that is available will be used).

~~†The most granular level provided (typically at two-second intervals).~~

~~a-b.~~ After the 10-minute window until the top of the next hour interval, for each interval, the actual generation will be compared with the FTC Level. The FTC Level for generation is:

- i. the sum of the approved, non-curtailed e-Tag(s) and the reliability level of curtailed e-Tag(s), or,
- ii. In the case of DSO 216 events, the generator limit for that interval.
- iii. In the case of congestion management procedures, the generator limit for that interval.

b. With the exception of instances where a resource submits replacement schedules pursuant to section B.~~34~~.a above, any power generated in excess of the generator limit or in excess of the total -approved, non-curtailed e-Tag(s) and the reliability level of curtailed e-Tag(s) after 10 minutes will be converted to kWh (by summing the excess kW for each scheduling interval and dividing by the applicable number of scheduling intervals per hour) and that power will be the billing factor for the Failure to Comply penalty ~~except as provided in Examples of Failure to Modify Generation Output below.~~

c. The billing factor for a generator's failure to generate the amount specified in a redispatch order after 10 minutes will be converted to kWh by summing the deficit kW for each interval and dividing by the applicable number of intervals per hour.

- d. If a generator's billing factor for any ~~hour interval~~ is less than or equal to 100-kWh, then that generator will be deemed to have fully complied with the Dispatch Order and will not be subject to the Failure to Comply Penalty for that ~~hour interval~~.
- e. For examples relating to this section, please refer to ~~the~~ examples ~~in Section E.4--6 below~~.

C. Customer's Failure to Shed Load

1. ~~Customers have 10 minutes after the issuance of a Dispatch Order to fully respond by shedding load as directed.~~ The start time of the 10-minute window is the ~~E~~ffective ~~T~~ime of ~~the the Dispatch e~~Order (rounded up to the next minute).
 - a. Load Shedding Dispatch Orders are communicated by phone and will include a statement from the BPA Transmission Services dispatcher specifying the time of the Dispatch Order.
2. Load data is collected at the most granular level provided (typically at two-second intervals). After the ~~Effective T~~ime of the ~~DD~~Dispatch Order, ~~10-minute window~~ until the top of the next ~~hour interval~~, for each interval, the actual load will be compared with the ~~FTC Level. The FTC Level for load is the~~ modified schedule or limit for that interval.
3. ~~-~~Any load in excess of the curtailed or limited schedule after 10 minutes will be converted to kWh (by summing the excess kW for each interval and dividing by the most granular level provided (typically at two-second intervals) and that energy will be the billing factor for the Failure to Comply Penalty.

D. Assessment of Reliability Penalty and Other Costs

1. A generator's or Customer's Failure to Comply with a Dispatch Order from BPA Transmission Services may cause BPA Transmission Services, as the Registered Entity responsible for compliance, to violate certain Reliability Standards. If the Regional Reliability Organization (currently the Western Electricity Coordinating Council, or WECC), Electric Reliability Organization (currently the North American Electric Reliability Corporation, or NERC), or FERC assesses a monetary penalty against BPA Transmission Services as the registered Entity for a violation of a Reliability Standard, and a generator's or Customer's Failure to Comply contributed to or caused the Reliability Standard violation at issue, then BPA Transmission Services will directly assign such penalty amount or a portion thereof to such generator or Customer based on the extent of its contribution. In order to directly assign costs associated with a monetary penalty to a generator or Customer, BPA Transmission Services shall use by the following procedures:
 - a. If BPA Transmission Services determines that any Reliability Standards have been violated, and that a generator's or Customer's Failure to Comply caused or contributed to the violation(s), BPA Transmission Services will self-report the violation(s) pursuant to WECC's Compliance Monitoring and Enforcement Program (CMEP). Within thirty (30) calendar days of such self-report, BPA Transmission Services will provide notice to the generator or Customer that BPA Transmission Services intends to directly assign all or a portion of the potential monetary penalty to the generator or Customer and set forth the factual basis supporting BPA Transmission Services' determination that the generator's or Customer's Failure to Comply caused or contributed to the Reliability Standard violation(s).
 - b. BPA Transmission Services will notify the generator or Customer when a Notice of Alleged Violation is issued pursuant to the CMEP, and the penalty amount proposed.

- c. BPA Transmission Services will not oppose any attempts by the generator or Customer to intervene in the CMEP proceedings conducted by WECC, NERC, or FERC. Failure by the generator or Customer to successfully intervene in the CMEP proceedings will not prevent BPA Transmission Services from directly assigning costs associated with a monetary penalty to that generator or Customer.
 - d. BPA Transmission Services shall have the sole discretion to decide whether to proceed through the Settlement Process or the Hearing Process under the CMEP. Regardless of whether BPA Transmission Services chooses to proceed through the Settlement Process or Hearing Process, BPA Transmission Services will present to WECC, NERC, or FERC the factual basis supporting BPA Transmission Services' determination that the generator's or Customer's failure to comply caused or contributed to the Reliability Standard violation(s).
 - e. Regardless of BPA Transmission Services' determination that a generator or Customer caused or contributed to the Reliability Standard violation(s), BPA shall be bound by the findings of WECC, NERC, or FERC regarding whether the generator or Customer caused or contributed to the Reliability Standard violation(s).
 - f. Based on the findings of WECC, NERC, or FERC, BPA Transmission Services will directly assign the appropriate amount of the monetary penalty to the generator or Customer. In the case where the generator's or Customer's Failure to Comply only contributed to the Reliability Standard violation(s), and the findings of WECC, NERC, or FERC do not allocate a specific percentage of contribution, BPA Transmission Services shall determine the appropriate contribution percentage. Should the generator or Customer disagree with BPA Transmission Services' determination of the appropriate contribution percentage in such a situation, BPA Transmission Services and the generator or Customer shall resolve the dispute in accordance with the Internal Dispute Resolution and External Arbitration Procedures set forth in Section 12 of [BPA Transmission Services' OATT](#).
2. The costs of any alternative measures taken by BPA Transmission Services to maintain the reliability of the Federal Columbia River Transmission System (FCRTS) as a result of a generator's or Customer's Failure to Comply will be assessed to the noncompliant generator or Customer.
- a. BPA Transmission Services will notify the Customer within 30 calendar days if BPA Transmission Services determines that the generator's or Customer's Failure to Comply resulted in BPA Transmission Services' incurrence of costs of alternative measures to maintain the reliability of the FCRTS.
 - b. Information to support BPA Transmission Services' determination will be available to the affected generator or Customer, upon request, for up to one year after the date the generator or Customer received notice under step 2.a above.
 - c. Any dispute regarding BPA Transmission Services' determination will be resolved in accordance with the Internal Dispute Resolution and External Arbitration Procedures set forth in Section 12 of BPA Transmission Services' OATT.

E. Examples of Failure to Modify Generation Output

~~Note: The OATI system screenshots included in this document are proprietary and not to be used outside the context of this document. Do not distribute without specific authorization from OATI.~~

1. In the following examples:

~~a. The next hour's schedule is can be any of the FTC Levels as described in Section B.5.b for generation and Section C.2 for load.~~

~~b. Each interval is curtailed to the FTC Level.~~

~~c. The schedule submitted to BPA Transmission Services is flat for the interval at the same level as the FTC Level~~

~~d. The Schedule with Ramp is the ramp basepoints for the schedule submitted to BPA Transmission Services for the interval.~~

~~e. The thin dashed red line represents the applicable "higher of" schedule for establishing the sum of schedules to determine the application of the Failure to Comply penalty charge during a ramp.~~

~~assumed to be the same as the modified schedule in the current hour, except as specifically noted.~~

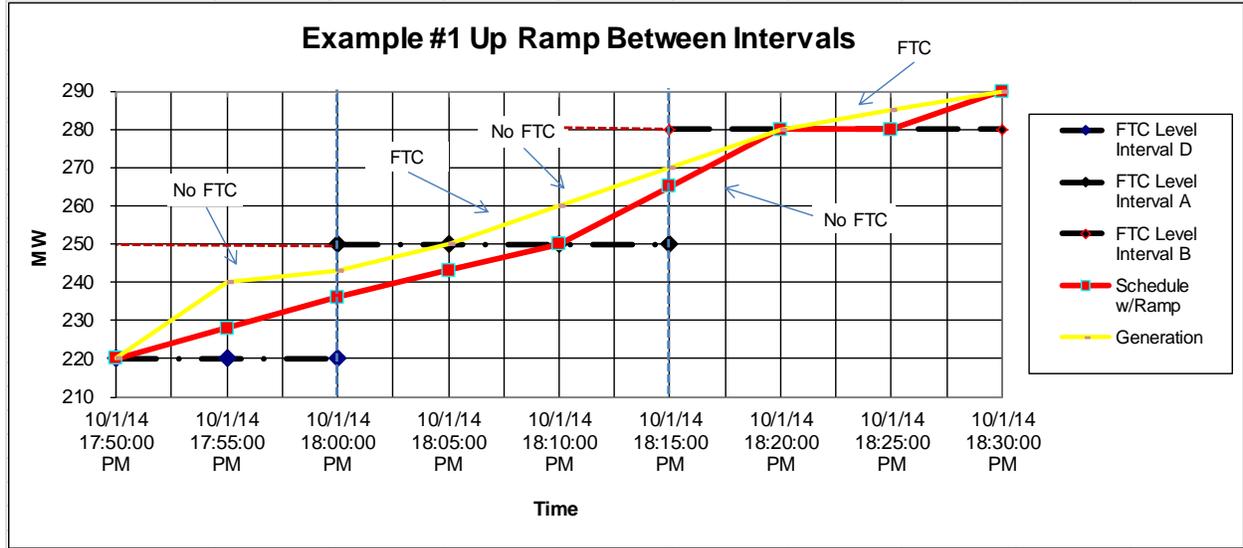
~~1.2. In practice, the next hour's schedule will not always be the same as the modified schedule in the current hour. If a generator's next hour schedule is higher than the modified schedule, the Failure to Comply assessment during the last 10 minutes of the hour will be based on the ramp to that next hour schedule. If a generator's next hour schedule is lower than the modified schedule, the Failure to Comply assessment during the last 10 minutes of the hour will be based on the modified schedule and not the ramp to that next hour schedule. The treatment is the same when the Dispatch Order is based on Limit Targets.~~

~~2.3. Example 1 - Curtailment via e-Tag Energy Profile Reduction at 25 minutes into the hour. Ramping Up Across Intervals~~

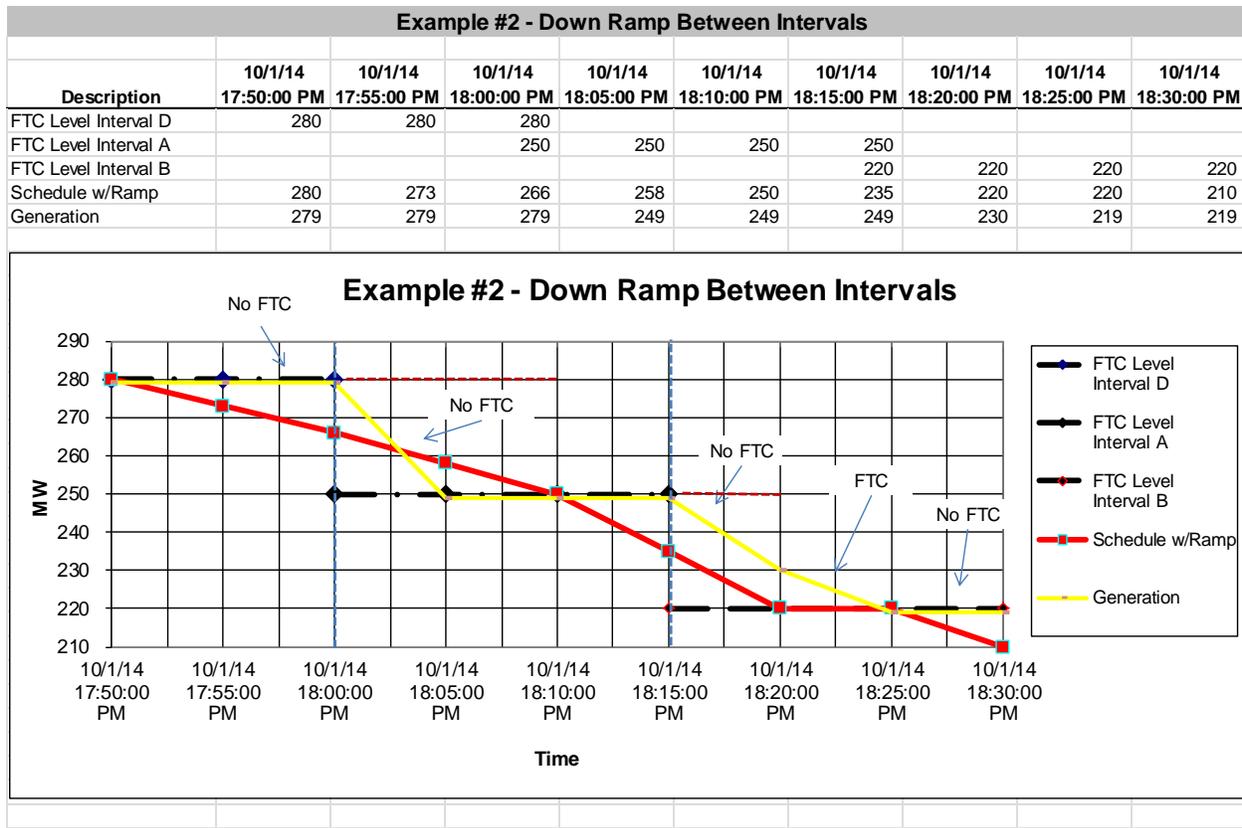
~~a. Example 1 shows a curtailment order being issued at 25-40 minutes into the hour to start at 40 minutes into the hour. There is then a 10-minute period, from the time the curtailment order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the curtailment. In an up ramp the resource must be below the next intervals FTC Level during the portion of the ramp period that is in the current interval to not be assessed the Failure to Comply penalty charge. In this example X, Y, and Z are all charged with a Failure to Comply at some point after 35 minutes into the hour (denoted by the vertical dashed line). W shows a generator that is generating below the curtailed schedule before the curtailment order is issued. Generator W did not need to modify generation output because the output prior to the curtailment was less than the curtailed schedule.~~

~~b. In the table below Example 1 shows the megawatts that are above the curtailed schedule and the duration it is exceeding the curtailed schedule. The output for Generator W is less than the curtailed schedule so there is no Failure to Comply.~~

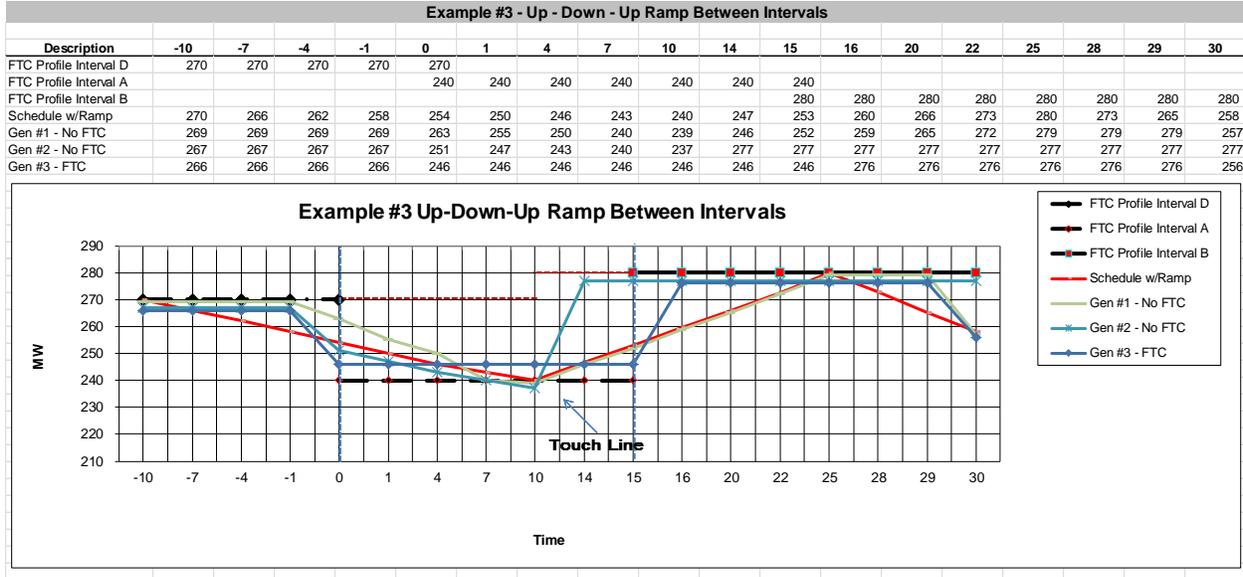
Example #1 Up Ramp Between Intervals									
Description	10/1/14 17:50:00 PM	10/1/14 17:55:00 PM	10/1/14 18:00:00 PM	10/1/14 18:05:00 PM	10/1/14 18:10:00 PM	10/1/14 18:15:00 PM	10/1/14 18:20:00 PM	10/1/14 18:25:00 PM	10/1/14 18:30:00 PM
FTC Level Interval D	220	220	220						
FTC Level Interval A			250	250	250	250			
FTC Level Interval B						280	280	280	280
Schedule w/Ramp	220	228	236	243	250	265	280	280	290
Generation	220	240	243	250	260	270	280	285	290



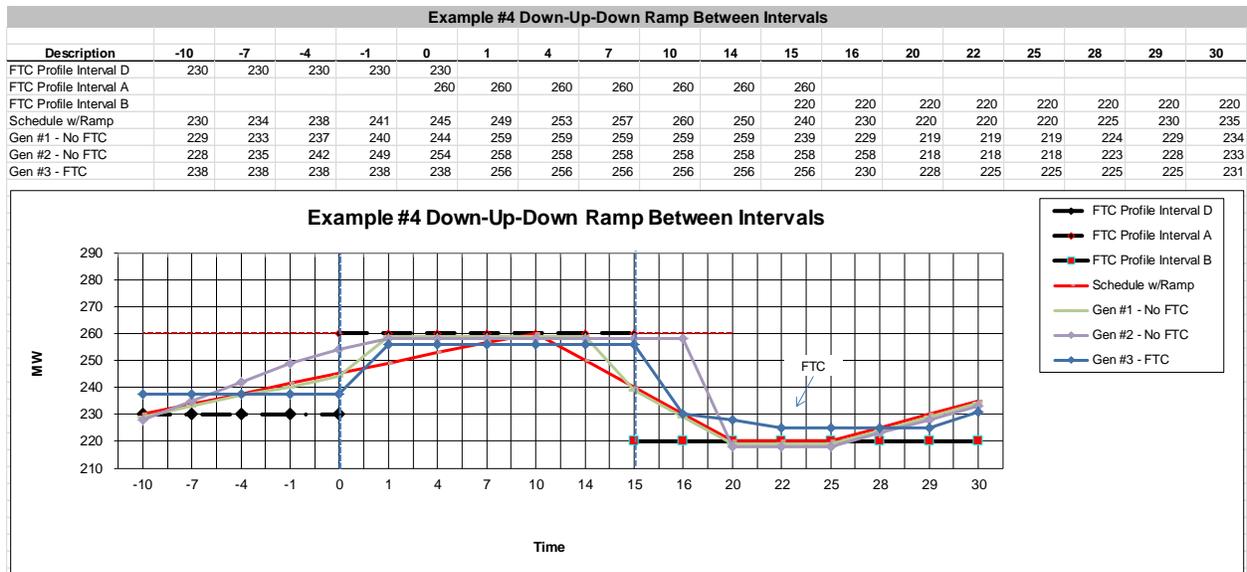
4. Example 2 - Limit to schedule order given by BPA Transmission Services at 25 minutes into the hour Ramping Down Across Intervals-
- a. Example 2 shows a curtailment order being issued at 40 minutes into the hour to start at 40 minutes into the hour. There is then a 10-minute period, from the time the curtailment order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the curtailment. In a down ramp the resource must be below the current interval's FTC Level during the portion of the ramp period that is in the next interval to not be assessed the Failure to Comply penalty charge. This example shows a limit generation to schedule order being issued at 25 minutes into the hour. There is then a 10 minute period, from the time the limit generation to schedule order was issued, for a generator to comply. After the 10 minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the limit generation to schedule order. In this example both B and D will be charged a Failure to Comply after 35 minutes into the hour, denoted by the vertical dashed line.



5. Example 3 - DSO-216 Wind Limit plus allotment of reserves given by BPA Transmission Services at 25 minutes into the hour. Up then Down then Up Ramping Between Intervals
 - a. Example 3 shows a curtailment order being issued at 40 minutes into the hour to start at 40 minutes into the hour. There is then a 10-minute period, from the time the curtailment order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the curtailment. This example shows the generation of three generators. Generator #3 is assessed Failure to Comply for not operating at or below the FTC Level of the next period for 1 minute following the end of the response time or ramp to that interval ("touch line"). This example shows a DSO-216 Wind Limit being issued at 25 minutes into the hour. A 5 MW reserves allotment has been added to the schedule. Schedule, plus allotment is the Target schedule. Generators will not be charged for being between the original schedule and Target schedule. Any Failures to Comply Penalty will be calculated using the Target schedule as the maximum generation allowed. There is then a 10-minute period, from the time the DSO-216 Wind Limit order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the DSO-216 Wind Limit order (generator output exceeds the sum of the approved e-Tags for that hour). In this example both B and D will be charged a Failure to Comply Penalty after 35 minutes into the hour.



6. Example 4 - Down then Up then Down Ramping Between Intervals ~~Redispatch order given by BPA Transmission Services at 25 minutes into the hour.~~
 - a. Example 4 shows a curtailment order being issued at 40 minutes into the hour to start at 40 minutes into the hour. There is then a 10-minute period, from the time the curtailment order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the curtailment. This example shows the generation of three generators. Generator #3 is assessed Failure to Comply for not operating at or below the FTC Level during the non-ramp period for the interval starting at xx:15. This example shows a redispatch order being issued at 25 minutes into the hour. There is then a 10-minute period, from the time the redispatch order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if a generator has not complied with the redispatch order. In this example both B and D will be charged a Failure to Comply after 35 minutes into the hour.



7. ~~Example 5- Curtailment Dispatch Order issued by BPA Transmission Services 10 minutes prior to the start of the hour, to become effective at the start of the next hour.~~
 - a. ~~This example shows a curtailment order issued by BPA Transmission Services at 10 minutes prior to the start of the hour. In this particular case, generators must reduce generation by the end of the 10-minute ramp for the next hour, in accordance with step 2 in the Assessing Generator Penalty for a Failure to Modify Generation Output section above. After the end of the ramp, the Failure to Comply Penalty will be assessed if the generator output exceeds the sum of the approved, non-curtailed e-Tag(s) and the reliability level of curtailed e-Tag(s) for that hour. In this example, B, C and D will be charged a Failure to Comply Penalty.~~
8. ~~Example 6- Curtailment Dispatch Order issued by BPA Transmission Services prior to the start of the hour, to become effective at the start of the next hour, with replacement schedule.~~
 - a. ~~This example shows a curtailment Dispatch Order issued by BPA Transmission Services prior to the start of the hour with submittal of a replacement schedule. In this particular case, a 40 MW e-Tag for HE12 was curtailed by 8 MW at 10:05 AM. The graph shows results of four possible alternative schedule changes made by the customer at 10:15 AM: A) the customer submits a 6 MW replacement schedule for HE12; B) the customer submits an 8 MW replacement schedule; C) the customer submits a 9 MW replacement schedule; D) the customer does not submit a replacement schedule. If the sum of the e-Tags (schedule) including the replacement schedules is greater than or equal to 40 MW then FTC will not be assessed. If not, then after the end of the hourly ramp for HE 12, the Failure to Comply Penalty will be assessed if the generator output exceeds the sum of the approved, non-curtailed e-Tag(s) and the reliability level of curtailed e-Tag(s) for that hour. In this example, A and D will be charged a Failure to Comply Penalty. B and C are not charged a Failure to Comply Penalty.~~

- ~~9. Example 7 – DSO 216 Wind Limit plus allotment of reserves given by BPA Transmission Services at 25 minutes into the hour, but the schedule for next hour is lower than the current hour’s schedule.~~
- ~~a. This example shows a DSO 216 Wind Limit being issued at 25 minutes into the hour. A 5 MW allotment has been made to the schedule. Schedule, plus allotment is the Target schedule. Generators will not be charged for being between the original schedule and Target schedule. Any Failures to Comply will be calculated using the Target schedule as the maximum generation allowed. There is then a 10-minute period, from the time the DSO 216 Wind Limit order was issued, for a generator to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if the generator output exceeds the sum of the approved e-Tags plus allotment for that hour. In this example, the original schedule reduces, but the FTC Target schedule does not reduce at the end of the hour as the schedule ramps to the next-hour schedule. D will be charged a Failure to Comply penalty while C will not, because its DSO 216 violation was less than or equal to 100-kWh.~~
- ~~10. Under circumstances where a wind turbine generating facility is under-generating and BPA Transmission Services issues a DSO 216 signal to curtail e-Tags due to exhausted balancing reserves, the generator will not be charged a Failure to Comply Penalty if it generates above the sum of the approved e-Tags for the remainder of the hour.~~
- ~~11. Example 8 – Generation Limit related to congestion management issued by BPA Transmission Services at 20 minutes into the hour.~~
- ~~a. This example shows BPA issuing a generation limit related to congestion management at 20 minutes into the hour. Any Failure to Comply violations will be calculated using each resource’s scheduled output as the maximum generation allowed. The resources’ scheduled output is the FTC Target schedule. Once BPA issues the generation limit, there is a 10-minute period for generators to comply. After the 10-minute period, the Failure to Comply penalty will be assessed if the generator output exceeds its scheduled output for the duration of the generation limit. The point at which FTC begins is denoted by the vertical dashed line at time 11:30. In this example, each resource has an approved schedule of 30 MW for the hour. Generator A complies with the generation limit while Generator B is issued a Failure to Comply penalty for not reducing output to its schedule.~~

F. Additional Information
Policy Reference

- [Transmission & Ancillary Service Rate Schedules : Section II.B](#)

Related Business Practices

- Redispatch & Curtailment Procedures

Version 10	10/1/2014 Version 10 of the Failure to Comply Business Practice has been revised to implement the assessment of the Failure to Comply penalty charge for 15-minute scheduling.
---------------	--

Version 9	05/19/2014 Version 9 of the Failure to Comply Business Practice has been revised to establish a methodology for generators to submit replacement schedules for curtailed schedules in order to avoid incurring FTC Penalty charges. Amended Example 6 to reflect replacement schedule policy in step B.3.a.
Version 8	08/28/13 Version 8 of the Failure to Comply Business Practice revises the calculation of the FTC Penalty billing factor to include generation limits related to congestion management events. Specifically, if resources are overgenerating relative to scheduled output, and such overgeneration is contributing to an SOL concern, BPA-TS will issue a generator limit(s) for the resource(s) impacting the SOL to reduce output to schedule prior to initiating pro rata curtailments. This is intended to reduce the instances or magnitude of pro rata curtailment events related to SOL concerns. FTC Penalty charges will apply to resources that exceed the generation limit target under these circumstances. A new example has been added to demonstrate this situation. Further, all other example graphs have been clarified for readability. Additionally, section B.4.a has been revised to calculate FTC using one-minute intervals as opposed to two-second intervals.
Version 7	10/4/12 Version 7 of the Failure to Comply Business Practice revises the calculation of the FTC Penalty billing factor to consider reliability limits, as opposed to the sum of approved schedules only. Specifically, the FTC Penalty billing factor will be calculated by comparing the actual generation to the sum of approved, non-curtailed e-Tags and the reliability level of curtailed e-Tag(s).. This revision will prevent the application of FTC Penalty charges to generation in excess of schedules that are below a reliability limit.
Version 6	03/23/12 Version 6 of the Failure to Comply Business Practice refines the methodology for determining the billing factor for FTC Penalties by utilizing the most granular meter data available from resources, and clarifies that if two Dispatch Orders are simultaneously in effect, Failure to Comply will be based on the lowest Dispatch Order.
Version 5	12/05/11 Version 5 added clarification to example 7, in step E.10.a, including "plus allotment; "reduces, but the FTC"; "does not"; and "while C wil not, because its DSO 216 violation was less than or equal to 100-k-Wh and detected "C and" from example 7. The example 7 chart titled "DSO 216 Wind Limit with Lower next-Hour Schedule" was revised and replaced.
Version 4	11/23/11 Version 4 of the Failure to Comply Business Practice has been amended to clarify that a generator that accrues a billing factor for an hour that is equal to or less than 100-kWh will be deemed to have fully complied with the Dispatch Order, and Failure to Comply will not apply for that hour in step B.4.d. • Language added to clarify that if a generator’s next hour schedule is lower than the modified schedule, the Failure to Comply assessment during the last 10 minutes of the hour will be based on the modified schedule and not the ramp to that next hour schedule in step E.2. • Amended Example 7 to reflect revised End-of-Hour ramp policy in step E.10.a.
Version 3.B	06/01/10 Version 3.B of the Failure to Comply Business Practice has been amended to clarify that the Failure to Comply penalty applies to all Dispatch Orders, including Dispatch Orders issued before the start of the hour. In particular, steps 7.7 and 7.8 include Example 5 and 6 to illustrate a curtailment Dispatch Order issued prior to

	<p>the start of the hour. Example 7 illustrates a DSO 216 Wind Limit being issued, where the schedule for the next hour is lower than the current hour's schedule. In these situations, the Failure to Comply penalty applies. Version 3.B of this business practice includes the following revisions: • Added language to the Dispatch Order definition in step 2.1 to include “orders or directives prior to the start of the hour or within the hour.” • Added step 3.1 to clarify the scope of the Failure to Comply Penalty. • Added step 3.3.1 to clarify the start time for the application of a Failure to Comply Penalty for Dispatch Orders issued prior to the start of the hour. • Added “except as noted in step 4.2” to step 4.1. • Added step 4.2 - 4.2.2 to clarify the start time for application of a Failure to Comply Penalty for Dispatch Orders issued prior to the start of the hour. • Added step 4.3 - 4.3.2 to address the treatment of curtailment Dispatch Orders. • Added step 4.5 to list the examples pertaining to step 4. • Added step 5.1.1 to specify communication of Load Shedding Dispatch Orders. • Added “except as specifically note” to step 7.1. • Added Example 5 in step 7.7 - 7.7.1, Example 6 in step 7.8 - 7.8.1, and Example 7 in step 7.9 - 7.9.1, including charts and tables. • Moved step 7.5.2 to step 7.10. Failure to Comply penalties on non-network paths will become effective beginning June 1, 2010. Changes to the version 3.B redline incorporate verbal and written customer comments.</p>
Version 2	<p>01/19/10 Version 2 of this business practice includes the following revisions: Step 2.2 Customer definition expanded to include non-Tariff transmission service. Step 3.3 “Will” changed to may, as the Bonneville Power Administration determines if the event qualifies as Force Majeure.</p>
Version 1	<p>10/01/09 The Failure to Comply business practice is the result of updating the General Rate Schedule Provision (GRSP) Section II.B. The purpose of updating the GRSP Section II.B is to allow Transmission Services to develop and implement a management method that allows for a more reliable transmission system.</p>