



## Transmission Services

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### Committed Intra-Hour Scheduling, V2

#### Response to Customer Comments

Posted: December 20, 2011

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Committed Intra-Hour Scheduling, V2, Business Practice posted for review from December 1, 2011 through December 16, 2011.

Thank you for your comments.

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## 1. Portland General Electric (PGEM)

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1. PGEM requests further clarification in *Part E, Section 3 on transmission curtailments* with respect to complying and limiting generation to not exceed the 'sum of remaining approved eTags'. BPA should ensure that these transmission curtailments are solely applied to reliability and transmission curtailments within BPA's network. Further, BPA should ensure that their restriction of generation to approved eTags includes capacity resources (ancillary services) that are contracted and accessible on demand which may or may not be eTagged. A CIH Pilot resource, who may also be participating in the BPA/CAISO dynamic pilot program, may be restricted by the pilot's scheduling guideline and the timing of transmission curtailments on the intertie.

### Transmission Service's Response

There are no additional or special requirements related to complying with curtailments and limiting generation to the sum of remaining approved e-Tags for CIH Pilot Participants. The requirements for generators in BPA's Balancing Authority Area to limit generation during hours when an e-Tag is curtailed can be found in the *Redispatch and Curtailment* and the *Failure to Comply Business Practices*.

2. In *Part F, Section 2 on the iCRS Generation Advisor*, PGEM suggest using a regionally acceptable sample rate, time delay and error band to enhance the 'gold standard' value that BPA expects to impose on potential CIH Pilot Resources. PGEM requests that BPA's gold standard is transparent and auditable by all CIH Participants and that BPA makes data readily available for historical analysis or easily retrievable via the iCRS tool.

### Transmission Service's Response

The average power generation values BPA provides through iCRS is the value BPA will use for assessing whether CIH participants are meeting the scheduling accuracy metrics for the CIH Pilot and are advisory in nature. CIH Pilot participants can make advance arrangements with BPA to receive the historical raw sub-minute Supervisory Control And Data Acquisition (SCADA) values that are integrated into one-minute values at the bottom and top of the hour for iCRS.

3. In *Part F, Section 3 on ramp duration*, PGEM requests clarification as recent DSO modifications will allow BPA to trigger limits and curtailments during the last ten minutes of the ramp. How will the 20-minute ramp duration from the second half of the hour schedule to the first half of the hour schedule be handled should a DSO event be triggered at the top of the hour?

### Transmission Service's Response

As stated in the revisions to the Business Practice, Section F, BPA will exclude the subsequent scheduling interval from scheduling accuracy metrics when there is a DSO-216 limit generation event. If the limit event is triggered at the top of the hour during the ramp and the DSO216 is for the entire hour, the scheduling interval beginning at the top of the subsequent hour is excluded from scheduling accuracy metrics.

4. In *Part F, Section 4 on the capacity component*, will BPA provide sub-minute generation and schedule data on the 1-minute average station control error? Additionally, how did BPA compute the logic for the capacity component deadband of 'the greater of 1mw or 2% of the largest absolute value of the 1-minute averaged station control error'? PGEM is concerned that a fixed deadband would be unfair to a CIH Pilot resource of larger nameplate capacity compared to another CIH resource with a much lower rated capacity. The same question is asked on the component deadband referenced in *Part F, Section 5 on the energy component*. How did BPA derive this deadband of 'the greater of 50MWh or two percent of the sum of the absolute value of the integrated imbalance'?

#### Transmission Service's Response

As stated in our response to question 2, CIH Pilot Participant can make arrangements with BPA to receive historic sub-minute SCADA values. BPA developed the Deadbands in recognition that there will be data acquisition differences and rounding error if a CIH participant is relying on their own data acquisition systems to inform a forecast for schedules instead of scheduling consistent with the average power values provided through iCRS. Our assessment of likely differences between our 2-second data acquisition rate and Customer's sample rate and timing indicated that the deadband should be adequate. Participants that schedule consistent with the iCRS values will not fail the metrics.

5. In *Part H, Section 2*, PGEM requests a more defined waiver process and suggests extending the waiver process to include challenges to accuracy metrics, policies, penalties or billing disputes.

#### Transmission Service's Response

The accuracy metrics and policies for CIH participation are set forth in this Business Practice, Section H. Customers retain all rights related to resolution of Billing Disputes under BPA's rates.

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## 2. Southern California Edison

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1. **Section B.1.d.** SCE does not think that a sink for the entire nameplate capacity is needed. There can be other ways to ensure compliance with accuracy metrics. SCE would like to strike "0 to nameplate" as written in the Section B.1.d.

#### Transmission Service's Response

BPA will retain this provision because BPA needs some assurance that under normal conditions the sink BA will accept the schedule change.

2. **Section E. #4** Given FERC's recent order, as follow should be removed from the Business Process.

During Environmental Redispatch, customers should follow the ER Business Practice to limit generation to communicated levels and continue to submit schedules consistent with their best estimate of what the plant would normally generate in the absence of the ER event. BPA will exclude hours where the CIH Pilot Resource is limited by ER and will also exclude the subsequent hour from scheduling accuracy metrics.

### Transmission Service's Response

BPA has removed Section E.4., but retain the right to reinsert a similar reference when issues related to the future requirements for ER are resolved.

#### 3. Section E. 4 SCE recommends replacing with following language.

E. Committed Intra-Hour Pilot Resource Scheduling for DSO216, Curtailments, Environmental Redispatch, and iCRS System Failure

4. During an iCRS Generation Advisor System Failure whereby iCRS ceases to produce the average generation value that we will use for determining scheduling accuracy performance (as explained further in Section F below), the Customer should schedule the subsequent scheduling interval as accurately as possible. In recognition that inaccuracy could result from unavailability of the average generation value, BPA will exclude the subsequent schedule interval from scheduling accuracy metrics.

### Transmission Service's Response

BPA will accept the revision.

#### 4. Section F. 2.

a. SCE requests the functionality of iCRS Gen Advisor providing the 30 minute persistency value not be limited to CIH participants. This value is also used to determine whether a facility is eligible for a waiver of Persistent Deviation, just as it is for determining scheduling accuracy for the pilot.

b. There are couple of typos which should be corrected.

2. 30-Minute Persistence Scheduling: The generator's schedule for the next schedule interval is the generator's 1-minute average of the actual generation 30 minutes prior. For example, the generator's schedule for 2:00 to 2:30 is the generator's actual average generation from 1:29 to 1:30 and the generator's schedule for 2:30 to 3:00 is the generator's actual average generation from 1:59 to 2:00. Through iCRS Generation Advisor, BPA will provide the average generation value that we will use for determining scheduling accuracy performance. The average value will be updated within 1 minute after H-x:30 and N-x:00.

### Transmission Services' Response

BPA is considering adding the 30 minute persistency value to iCRS Gen Advisor for all Wind generators in a future release.