

Portland General Electric comments for BPA Business Practice: Committed Scheduling for 2014-2015 Rate Period,

Portland General Electric Company (PGE) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) proposed Committed Scheduling for 2014-2015 Rate Period, Version 1 business practice. As a participant in the Committed Intra-Hour Pilot Program, PGE has exceptional depth of knowledge with the proposed business practice over the past year and a half.

For participants in the Committed 30/60 Scheduling there may be times when the participant has the ability and desire to schedule on a 30/30 Scheduling basis. In PGE's experience during periods of high wind plant output volatility the ability to schedule at 30 minute intervals provides prudent and worthwhile assistance to BPA and the region with regards to reserve capacity. To the extent that 30/60 scheduling participants are interested and capable of providing voluntary assistance, the business practice accuracy metrics should align for that purpose.

PGE would like to recommend that BPA revise section F. 2. as follows:

a. BPA will verify on an ongoing basis that the hourly schedule used is at least as accurate as the 30-minute persistence signal for the 60 minute interval provided through iCRS. The baseline metrics for accuracy comparison shall include a capacity, energy, and accumulated energy component. Any 30/60 Scheduling customer shall not be penalized with a deviation should they choose to schedule according to the 30 minute persistence value for 30 minute scheduling.

b. 30-Minute Persistence Signal for 60-minute Scheduling (Committed 30/60): The generator's schedule for the next schedule interval is the generator's 1-minute average of the actual generation 30 minutes prior to the hour. For example, the generator's schedule for 2:00 to 3:00 is the generator's actual average generation from 1:29 to 1:30. Through iCRS Generation Advisor, BPA will provide the average generation value that we will use for determining scheduling accuracy performance every 30 minutes. The average value will be updated within 1 minute after H-x:30 and H-x:00. BPA will measure 30/60 scheduling participants according to the H-x:30 value for metric accuracy.

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g. A Committed 30/60 Scheduling Participant scheduling to the BPA-provided 30-minute persistence value for every 60-minute schedule interval will satisfy the schedule accuracy metrics for capacity, energy, and accumulated Energy Imbalance. If a 30/60 entity submits a schedule according to the 30/30 scheduling persistence value any failure of that scheduling interval shall be automatically waived.

PGE endorses the changes to section H.3. However, given PGE's recent difficulties attempting to initiate the automated scheduling process, we suggest the following language adjustment;

3. After BPA issues two such unwaived failures of a schedule interval for a single performance metric over a 30-day period, the next notice will require the committed scheduling participant to automate scheduling to the BPA-provided persistence value in a manner consistent with applicable DOE cyber security standards. Upon receipt of a notice with this requirement, the committed scheduling participant must notify BPA of its intent to comply within ~~two~~ five Business Days, and execute the change in its scheduling systems within ~~two weeks~~ one month of receiving BPA's new signal. During the intervening period the committed scheduling participant is expected to exercise due diligence to continue to achieve the expected scheduling accuracy.

PGE appreciates the opportunity to comment on the proposed Committed Scheduling for 2014-2015 Rate Period, Version 1 Business Practice. PGE believes these proposed language changes will provide clarity to the metrics and allows participants willing to assist BPA by scheduling more accurately and improve reliability in the region to do so without the fear of failing applicable metrics. The proposed adjustment to the failure notification language will ensure that those participants either choosing to use an automated process or required to do so, have sufficient time to deploy the complex process in a reasonable timeframe. In PGE's experience the added flexibility provided to participants may provide additional operational efficiency to the proposed business practice.