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U.S. Department of Energy
Bonneville Power Administration
Transmission Services
P.O. Box 64019
Vancouver, WA 98666-1409

Via email: techforum@bpa.gov

RE: Comments of Puget Sound Energy, Inc. on the Committed Scheduling for the 2014-2015 Rate Period, Version 1, Business Practice

Puget Sound Energy, Inc. (“PSE”) respectfully submits these comments on the proposed Committed Scheduling for the 2014-2015 Rate Period, Version 1, Business Practice (the “Committed Scheduling Business Practice”). PSE appreciates the opportunity to comment on the Committed Scheduling Business Practice and looks forward to working with Bonneville Power Administration (“BPA”) and others in the region with respect to the two committed scheduling options available for customer election in the 2014-2015 rate period.

Section B.1.d. of the Committed Scheduling Business Practice

Section B.1.d. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

Inform BPA about the methods by which the potential participant expects to achieve scheduling accuracy that is consistent with or superior to the schedule error metrics described below in section F. BPA will apply the same performance metric regardless of the scheduling method used.

Committed Scheduling Business Practice at page 2. BPA should either waive or significantly shorten the prequalification period for potential committed scheduling participants that schedule in accordance with the BPA signal. Schedules submitted by potential committed scheduling participants that schedule in accordance with the BPA signal will, by definition, achieve scheduling accuracy that is consistent with or superior to the schedule error metrics described below in section F of the Committed Scheduling Business Practice. Therefore, a prequalification period of two weeks is unnecessary for

these participants, and BPA could use this period for other purposes, such as testing connections and protocols.

Section B.1.e. of the Committed Scheduling Business Practice

Section B.1.e. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

Prior to BPA allowing a customer to receive the applicable rate associated with Committed Scheduling, the potential participant must demonstrate for at least two calendar weeks its ability to meet the scheduling accuracy metric, regardless of whether the resource is new or existing.

Committed Scheduling Business Practice at page 2. BPA should delete the phrase “at least” from Section B.1.e. of the Committed Scheduling Business Practice, which introduces uncertainty with respect to the prequalification requirements. BPA should instead require potential participants to prequalify for a defined period (i.e., two calendar weeks) rather than an undefined period.

Section B.1.f. of the Committed Scheduling Business Practice

Section B.1.f. of the Committed Scheduling Business Practice proposes to require the following of potential committed scheduling participants:

The Uncommitted Scheduling VERBS Base Rate (Section III.E. 2 of BPA’s ACS-14 rate schedules) will apply during the period that the potential participant is providing prequalifying information to BPA and demonstrating the ability to meet the scheduling accuracy metric. If the potential participant demonstrates its scheduling ability during September of 2013 (see section G), the applicable VERBS rate from ACS-12 rate schedule will apply during that month.

Committed Scheduling Business Practice at page 2. BPA should amend section B.1.f. of the Committed Scheduling Business Practice to allow potential participants that satisfy requirements for Committed 30/30 Scheduling and Committed 30/60 Scheduling during the prequalification period to receive the Committed 30/30 Scheduling VERBS Base Rate and Committed 30/60 Scheduling VERBS Base Rate during the prequalification period. If potential participants satisfy the requirements for the reduced rates during a period, then they should pay the reduced rate for such period.

Additionally, BPA may receive many prequalification requests for September 2013, and the volume of the requests may require additional time to process. BPA should commit that prequalification periods that begin on or before September 10, 2013, will receive the VERBS rate from ACS-12 rate schedule for the duration of the prequalification period, even if the prequalification period extends beyond October 1, 2013, for reasons outside the control of the potential participants.

Sections E.1, E.3, and E.4 of the Committed Scheduling Business Practice

Sections E.1, E.3, and E.4 of the Committed Scheduling Business Practice states that, in the event of a generation limit, schedule curtailment, or iCRS system error, BPA will exclude the “subsequent scheduling interval” from scheduling accuracy metrics. The “subsequent scheduling interval” will be 60 minutes for participants in Committed 30/60 Scheduling and 30 minutes for participants in Committed 30/30 Scheduling. BPA should revise these sections to exclude the *two* subsequent scheduling intervals from scheduling accuracy metrics for participants in Committed 30/30 Scheduling. This revision would allow participants in Committed 30/30 Scheduling a full 60 minutes (the same amount of time allowed participants in Committed 30/60 Scheduling) to return to full potential generation by the time of the next persistence measurement.

Sections F.1.d, F.1.e, and F.1.f of the Committed Scheduling Business Practice

Sections F.1.d, F.1.e, and F.1.f of the Committed Scheduling Business Practice refer to persistence schedules or energy imbalance accumulations “over the last seven days.” BPA should clarify these sections by specifying that the persistence schedules or energy imbalance accumulations are over the last seven *calendar* days.

Section G.1. of the Committed Scheduling Business Practice

Section G.1. of the Committed Scheduling Business Practice states, in part, as follows:

BPA will notify a potential committed scheduling participant when the potential participant has met the pre-qualification requirements and request written acknowledgment that the terms of this Business Practice will govern participation in Committed Scheduling.

Committed Scheduling Business Practice at page 8. BPA should (i) clarify how BPA will notify a potential committed scheduling participant when the potential participant has met the pre-qualification requirements and (ii) commit to notifying a potential committed scheduling participant that it has met the pre-qualification requirements within three calendar days of such participant meeting such requirements.

Section H.1. of the Committed Scheduling Business Practice

Section H.1. of the Committed Scheduling Business Practice states, in part, as follows:

If the committed scheduling participant’s scheduling accuracy does not meet the Scheduling Accuracy Metrics, BPA will notify the committed scheduling participant within 10 Business Days by written notice. Upon receipt of such notice, the committed scheduling participant is expected to correct the scheduling accuracy within one Business Day.

Committed Scheduling Business Practice at page 8. BPA should clarify that a participant whose accuracy does not meet the metrics in the intervening period between the initial failure and the time the participant receives written notice from BPA is assessed only one failure and not multiple failures. BPA could achieve such a result by specifying that the period commencing at the time of the initial metric inaccuracy and ending one business day after receipt by the participant of the BPA notice is a single error.

Section H.3. of the Committed Scheduling Business Practice

Section H.3. of the Committed Scheduling Business Practice states, in part, as follows:

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.

Committed Scheduling Business Practice at page 8. BPA should clarify that the phrase “over a 30-day period” refers to a “rolling 30 calendar day period.”

Sections H.4. and H.5. of the Committed Scheduling Business Practice

Section H.4. of the Committed Scheduling Business Practice states as follows:

BPA may initiate moving a committed scheduling participant to a longer scheduling option as defined in VERBS Base Rate Section III.E.2 of the ACS-14 rate schedule upon failure to automate scheduling or on the third unwaived failure of performance.

Committed Scheduling Business Practice at page 8 (italics added). Section H.5. of the Committed Scheduling Business Practice states as follows:

The Participant will be billed for Uncommitted Scheduling at the start of the next billing cycle if the Participant fails to convert to automated scheduling of the BPA-provided persistence value within two weeks of receiving the new signal from BPA. Termination will take effect on the last day of the current billing cycle.

Id. These two sections appear inconsistent with each other. Section H.4. appears grant BPA the option to move a committed scheduling participant to a longer scheduling option upon a failure to automate scheduling, whereas section H.5. appears to require BPA to bill a participant for Uncommitted Scheduling if the participant fails to convert to automated scheduling within two weeks of receiving the new schedule . Thus, it appears that section H.5. requires BPA to take an action that section H.4. suggests is within BPA’s discretion. If this is true, then section H.4. (and sections H.7. and H.8., each of

which expands upon section H.4.) is superfluous. BPA should clarify this apparent inconsistency.

Conclusion

PSE respectfully requests that BPA modify the Committed Scheduling Business Practice in accordance with the edits and clarifications suggested in these comments. As stated above, PSE appreciates the opportunity to comment on the Committed Scheduling Business Practice and looks forward to working with BPA and others in the region with respect to the two committed scheduling options available for customer election in the 2014-2015 rate period.

Sincerely,
Puget Sound Energy, Inc.

By



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