

Comments of Southern California Edison: BPA's Dynamic Transfer Capability Business Practice

Please find Southern California Edison (SCE) suggestions on Bonneville Power Authority's (BPA's) Business Practice *Dynamic Transfer Capability: Requesting and Awarding Access - Pilot, Version 4* (BP). SCE supports the direction that BPA's modifications take the Dynamic Transfer Capability (DTC) process but recommends some changes to add clarity and utility to the BP.

BPA should provide adequate time for firm transmission procurement by allowing the showing of firm transmission up to two weeks before DTC awards.

Section A.1.a requires an applicant to hold an appropriate Transmission Service Agreement to be eligible for awards. Considering the procurement time frame imposed by the BPA schedule, SCE believes that the requirement to hold firm transmission is unnecessary and will unnecessarily limit participation from entities that do not currently hold appropriate firm transmission. To allow full subscription of DTC, in the available timeframe, SCE suggests a two tier priority approach. The Tier 1 (the highest tier) would consist of requestors that show appropriate firm transmission at least two weeks prior to the DTC awards. Tier 2 would consist of all other requestors. While Tier 1 requestors can be awarded DTC upon announcement of the respective DTC award, Tier 2 requestors, to be eligible for award of unawarded DTC, would be required to show appropriate transmission no more than two weeks after DTC awards. This strategy avoids the queuing of requests, allows BPA additional ability to subscribe the full DTC available and gives requestors adequate time to acquire firm transmission.

BPA should allow resources to split their installed capacity between BPA and the Attaining BA.

The BP does not speak to the question of splitting a unit's capacity between DTC exports and static schedules. The BP should clearly delineate that DTC requests and awards are allowed for a portion of the respective plant's installed capacity.

SCE believes that the capability to split an installation's output provides substantial benefits for the resource in that it would provide a vehicle to better match output with available transmission given the scarcity of the latter.

Furthermore, BPA benefits by enabling better utilization of available DTC during awards. As an example, if a 150MW resource could only obtain 100MW of DTC it could still dynamically export up to 100MW and then submit static schedules for the balance of the capacity. By doing so, BPA would benefit by only needing balancing reserves sufficient to cover the 50MW

Section B.5.j should be changed to specifically include designation of system resources for balancing.

Although not part of the proposed changes, Section B.5.j could benefit from some clarification. In its current draft, the BP can be read to say that balancing resources must be unit specific. SCE believes that "system resources" should be specifically included in the requirement to avoid any ambiguity. The section would benefit from language similar to the following:

If the Applicant intends to use the Dynamic Transfer Capability awarded pursuant to this request to remove a resource from BPA's Balancing Authority Area, the Applicant must identify either the resource(s) or the BAA system that will be used to balance the Dynamic Transfer.

Section B should be modified to clearly state the different requirements for import and export DTC.

SCE believes that some clarity should be provided within section B and its subsections regarding the application of the requirements specific to imports of balancing energy, exports of power, and removal from the BAA. It would be helpful if these three cases were clearly identified and the application rules specific to those cases were gathered in separate sections. The particular sections that would be separated by case would be e,i,j,k,l, and m.

Closing

SCE believes that the above changes to the BP will provide certainty to the DTC process and better accommodate the smooth operation of the awards process. If you have any questions, please contact: John Zoida, Manager of Renewable of Resource Integration, (626)302-3336, john.zoida@sce.com