Transmission Services

# Dynamic Transfer Operating and Scheduling Requirements, Version 5

## Response to Customer Comments

Posted: September 30, 2015

This document contains the Transmission Customer comments and Transmission Services' response to those comments for Dynamic Transfer Operating and Scheduling Requirements, Version 5, posted for review from August 27, 2015 through September 23, 2015.

Thank you for your comments.

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## Powerex

Powerex has reviewed the "Proposed Changes to COI DTC" presentation, and has some concerns regarding BPA's proposal to freeze the real-time dynamic upper limit when high COI flows occur. Although Powerex understands and strongly supports BPA's need to ensure the reliability of its transmission system, Powerex believes that BPA should protect the priority rights of its Long Term Firm Point-to-Point (LTF PTP) customers in accordance with OATT principles.

In this regard, Powerex believes that when high COI flow conditions occur that may jeopardize reliability, BPA should first take proactive steps to stop sales and/or curtail schedules of non-firm transmission until BPA is in a position where it can accommodate all reservations of firm transmission, including those that may involve as yet undeployed dynamic transfers.

Powerex does not believe it is appropriate to limit the amount of dynamic transfers by customers that have purchased firm transmission on BPA's system at times when non-firm transmission is flowing. Customers that have invested in BPA's transmission system by purchasing LTF PTP transmission should be given the priority afforded to them under the OATT. Needless to say, however, if BPA still has reliability concerns even after it has curtailed all non-firm transmission on the COI, then BPA must take further steps such as reducing firm schedules on a pro rata basis, etc.

Powerex hopes that BPA will re-consider its decision to freeze a customer's real-time dynamic upper limit to their current output during high COI flows, and instead will consider curtailing non-firm schedules prior to the hour to ensure dynamic schedules can be dispatched within the full range reserved, consistent with OATT principles.

Thank you for the opportunity to provide comments.

### Transmission Service's Response

Thank you for your comments. BPA has considered a similar approach but plans to move forward with the proposal as described in the Dynamic Transfer Operating and Scheduling Requirements, Version 5. BPA will track the frequency of use and magnitude of the real-time controls.

BPA believes the proposed approach is the appropriate course of action at this time because dynamic schedules are unique in creating the need for this particular control for reliability. The controls are not needed for traditional congestion management, but rather to control for impacts of unpredictable variability. During these specific system operation conditions the voltage is particularly sensitive to *unexpected* increases in flow. Dynamic (as opposed to normal) schedules are unique in their ability to trigger this sensitivity. In fact, it may be possible to reliably accommodate *more* static flow (if is scheduled and with prior notice) while still needing to protect against the change in flow that is possible with dynamic schedules. These controls are in addition to normal congestion management measures that protect for the System

Operating Limit (SOL). However, there are conditions where the proposed controls may be necessary while there is no serious concern about the SOL.

Further, as is the prevailing practice in WECC, the sink Balancing Authority (BA) is responsible for congestion management (i.e., curtailments) in real time. Therefore, when this specific operating condition occurs in a north to south direction, the Path Operator on the southern end (CAISO) curtails in the amount agreed to by both parties. Because high flows frequently occur in this direction the proposal has mitigated solvency because BPA is not always responsible for implementing curtailments. In addition, BPA is not the only Transmission Provider on the northern portion of the COI that has dynamic schedules, and thus a change in our curtailment or transmission sales practices would not impact all schedules on the COI. Further, these conditions can occur when curtailments would not otherwise be needed to protect for the SOL.

That being said, BPA is very interested in monitoring any impacts of this control and discussing them with customers and regional stakeholders. If further changes in commercial practices are warranted in the future we will be glad to discuss them with customers. We will also continue to study the nature of this constraint and other COI DTC issues.

## Portland General Electric

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) various business practice changes. As a Point-to-Point (PTP) transmission customer, remote generation owner, and active market participant, PGE has considerable interest in these business practices. With this document, PGE hereby provides recommendations for consideration and comment on the following proposed revisions to BPA's business practices: Dynamic Transfer Operating and Scheduling Requirements, Version 5.

1) PGE supports BPA's proposed increase of the COI DTC heavy load limit from 200 MW to 400 MW and would like to thank BPA for its participation and effort put forth in advancing the regional COI DTC study managed by ColumbiaGrid.

2) PGE is concerned, however, that BPA's proposal to lower the COI DTC light load limit from 550 MW to 400 MW may be based more on historical information rather than reliability constraints. As regional markets develop and variable energy and flexible generation continue to grow, more light load COI DTC will be essential in facilitating efficient and economic operations throughout the region. PGE believes that historical information may not accurately reflect future needs.

3) PGE encourages BPA to develop a process for consistent and periodic reviews and/or studies of COI operating conditions and the impacts to COI DTC. Establishing a clearly defined process for reviewing and updating the COI DTC limits aligns with BPA's practices of transparency and stakeholder input regarding business practice updates or modifications.

PGE appreciates the work that BPA puts into creating high quality business practices and the willingness to allow customers to participate in that process. PGE requests a review of the comments provided above and looks forward to BPA's clarifying remarks.

### Transmission Service's Response

Thank you for your comments. The proposed COI DTC limits are based on reliability studies, not historical data. Thus, BPA believes reduced light load limitations are necessary to manage COI reliability prudently. Also, proposed limits are the result of a well-supported regional study process that included Portland General Electric. Though BPA referenced in our materials that the 550MW limit has never historically been reached, that was not meant to imply that the new numbers are based on anything other than the above study.

BPA expects to continue to monitor COI DTC use and impacts and to periodically discuss the results and any proposals that may result with stakeholders, in addition to the same regional group that worked on this study. BPA also intends to continue to support efforts for continued DTC innovation.

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PacifiCorp

PacifiCorp (PAC) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) proposed revisions to BPA's business practices: Dynamic Transfer Operating and Scheduling Requirements, Version 5.

1) PAC supports and appreciates BPA's proposed increase of the COI DTC heavy load limit from 200 MW to 400 MW and recognizes the effort undertaken by all involved to update these limits. PAC understands the reasoning behind lowering the COI DTC light load limit from 550 MW to 400 MW. That being said, PAC encourages BPA to continue to update the COI DTC limits through studies and set the limits based on reliability constraints as opposed to using historical data.

### Transmission Service's Response

Thank you for your comments. As stated above, the proposed limits are the result of a well-supported regional study process that included PacifiCorp. Though BPA referenced in our materials that the 550MW limit has never historically been reached, that was not meant to imply that the new numbers are based on anything other than the above study.

BPA expects to continue to monitor COI DTC use and impacts and to periodically discuss the results and any proposals that may result with stakeholders, in addition to the same regional group that worked on this study. BPA also intends to continue to support efforts for continued DTC innovation.