

From: John C. Dietz [mailto:jcd@mc-power.com]
Sent: Wednesday, April 03, 2013 9:25 AM
To: Tech Forum
Subject: FW: Comments for Failure to Comply Business Practice

McMinnville Water and Light has the following comments on the Failure to Comply Business Practice

Comment (1)

As a small utility, McMinnville has no ability to reduce its load after hours within the 10 minute window [during non-business hours](#). This may be difficult even during regular business hours. Based on the amount of load, MW&L would need to develop plans within the 10 minutes on who will be shut off and for how long. With one customer that is 40% of our load running a continuous process the economic and safety concerns for plant personnel are tremendous. Many of your personnel have visited our largest customer, and understand that an unscheduled interruption in that process is not only an economic hardship, but also a risk to equipment and safety of plant personnel.

Many of the small utilities that BPA serves would not have the ability to reduce load within the 10 minute window. The financial risks for these small utilities would be tremendous.

Comment (2)

McMinnville believes that a 10 minute ramp down to a thermal plant may cause damage to the plant. Thermal plants do not have the same ramping characteristics as a hydro or wind generator.

Comment (3)

McMinnville would like clarification on WECC, NERC and FERC language referencing penalties. Our question here is, what standard or standards is BPA referencing? Is this part of your EOP-003 Load Shedding Plan(s) or is this fall under EOP-002 Capacity and Energy Emergency Plan. We believe that there needs to be more dialogue with the region, as most small utilities will be unable to comply with this business practice [without incurring penalties](#).

[McMinnville suggests BPA Transmission services insert language to give discretion to waive penalties depending on circumstances related to the event.](#)

John C. Dietz
Engineering and Operations Manager
McMinnville Water and Light
503-472-6158
jcd@mc-power.com