



April 8, 2013

Bonneville Transmission Administration
Transmission Services

Subject: Comments on Proposed Failure to Comply, Version 8, Business Practice

Northern Wasco County People's Utility District (NWCPUD) commends BPA for considering curtailment of overgeneration as the first action to mitigate the impacts of curtailments on generators in the BPA Balancing Authority Area. Generators producing more energy than scheduled amounts, as represented in the e-Tag, should be the first in line to resolve a System Operating Limit (SOL) because their contribution to the limit exceedance is clearly beyond the amounts considered in operations planning and adversely impacts customers that schedule accurately.

BPA should also consider the transmission allocation amount on the e-Tag. Unreserved use may be occurring and those customers who have purchased transmission in excess of their scheduled quantities may be unfairly curtailed under such circumstances. For example, a customer that purchases and allocates 6 MW of transmission for a generator that typically produces 5.2 MW of output may schedule 6 MW occasionally to minimize generation imbalance. This customer should not be exposed to FTC penalties when others exceed their schedules and/or reservations.

Small, unattended plants have difficulty safely implementing the 10-minute ramp window. Some consideration for exempting small, unattended generators is appropriate.

- The small, unattended generator threshold should be consistent with the NERC definition of generators subject to Generator Owner/Operator requirements.¹
- Curtailment of an e-Tag presumes that the Sink Balancing Authority Area no longer participates in the interchange transaction and therefore the shift factors/PTDFs no longer represent actual flow impacts on constrained flowgates.² Energy becomes Generation Imbalance with BPA's Balancing Authority Area

¹ NERC. Compliance Registry, Appendix 5B — Statement of Compliance Registry Criteria

² In the context of these comments, "Curtailment" means adjustment and approval by reliability entities of the e-Tag energy profile. Balancing Authority Areas that use e-Tags for Scheduled Interchange will automatically adjust AGC values to respond to such decreases in Scheduled Interchange.

generating units controlling AGC error.

- The proposal, in section B.3.a., permits submission of schedules that do not further exacerbate the SOL and comparable treatment for small unattended generators is required by the OATT. A small, unattended generator will be sinking energy to BPA as Generation Imbalance, after an e-Tag curtailment. It is quite possible that the generator is no longer contributing to the SOL based on the shift factors/PTDFs associated with sinking to BPA generators on AGC, and therefore it should be afforded the same consideration as a generator that submits schedules that no longer contribute to the SOL.
- There may be significant safety issues associated with attempting to manually control small remote generators that are unattended when curtailment actions occur, such as hours ending 23 through 07. To respond in ten-minutes is simply not safe if the operator must wake-up, dress, drive, enter a secure facility, ensure clearances are taken, and initiate a plant shutdown (many small plants cannot ramp to intermediate output levels). Our organization places safety first and will not make any exceptions to avoid financial penalties.

If BPA is unable to find a clear path to granting these recommended provisions, it should permit these entities to request waiver of the penalty charges and afford the entity a chance to explain why the penalty should be waived.

Thank you for opening up discussion of this policy and business practice for comment. NWCPUD sincerely wants to take all safe actions necessary to assist BPA's efforts to effectively manage system operating limits. Please let me know if you have any questions about these comments.

Yours truly,

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