

Portland General Electric Company (PGE) appreciates the opportunity to comment on BPA’s revision to the Failure to Comply Business Practice version 7. Please accept our comments below.

**Reliability limit not clearly noted on OATI eTags**

The Failure to Comply Business Practice version 7 requires generation to be maintained within the sum of the approved , non-curtailed e-Tag(s) and the reliability level of curtailed e-Tag(s). Reliability limits are clearly identified in OASIS under a specific transmission service request (TSR) in OASIS Reductions but are not explicitly identified on an OATI eTag. Based on BPA’s Bulletin – *Reliability Limits and Outages Information, v.4, Section A – Next Hour Reservation Reliability Limits:*

- 3. *Despite a Reliability Limit, Customers may schedule up to the full TSR transmission demand.*
  - a. *Firm Transmission schedules, in excess of the Reliability Limit are subject to pro-rata reliability reductions in Real-Time for next hour.*
  - b. *Non-Firm Transmission schedules in excess of the Reliability Limit are subject to reliability reductions based on OASIS Queue time of the corresponding TSR (Last In First Out (LIFO)).*

When a transmission provider sets a reliability limit on a transmission path they are not implementing a curtailment; and as such the transmission customer has the ability to schedule energy up to the transmission profile limit. When an eTag curtailment occurs in Real Time, the transmission profile is kept whole on OATI eTags and the reliability limit is only a suggested value and labeled under the energy profile instead of the transmission profile.

In addition, OATI eTags display a graphical view of a reliability limit but this does not provide clear and concise information of the exact limit value. The graph below is an example of a CISO unscheduled flow (USF) curtailment. The orange line indicates the reliability limit set on the transmission path which was originally eTagged at 25mw but a reliability limit was set at 21mw. To ensure accuracy, one should not have to refer to a graph display to obtain the reliability data. PGE suggests that any restrictions on transmission should be reflected in the transmission profile and that the reliability level of the e-tag should not be the basis for determining FTC penalties.



**Dead band limit for Variable Energy Resources**

Under BPA's DSO Strike Assessment guideline, if a dispatch standing order directive is issued and a generation limit target is set, Variable Energy Resources (VERs) within BPA's Balancing Authority (BA) are given a dead band limit of:

The dead band will consist of the greater of: (1) 3% of the greater of the capacity in MW of the VERBS BPA TS Billing Factor or nameplate (number of turbines multiplied by turbine rating); or (2) 4 MW, using standard rounding rules (i.e. 0.5 or greater is rounded to 1 MW).

BPA should consider adding this dead band limit to their Failure to Comply business practice when multiple eTags are designated out of a VERs and only one of the multiple eTags has been issued a reliability limit. Limiting generation on VERs to specific narrow parameters can be a challenging task due to issues surrounding blade pitch controls, network communication delays and creep issues, etc. If the generator complies to the reliability curtailment, the 'sum' of all non-curtailed eTags and reliability limits on curtailed eTags should include this dead band limit on VERs schedules, specific to the generation limit on non-curtailed eTags.

#### **Generation imbalance**

The Failure to Comply Business Practice version 7 proposes to sum the total of non-curtailed eTags with the reliability limit on curtailed eTags and requires customers to lock in generation to the sum of these values. BPA is contractually obligated under its LGIAs to provide Generation Imbalance Service when there is a difference between scheduled and actual energy delivered from generation resources in the BPA Control Area during a schedule hour. BPA's customers pay for this service. There is nothing in the LGIAs which excuse BPA from continuing to provide Generation Imbalance Service if a path is not impacted by a curtailment or operational constraint. BPA should continue to provide the Generation Imbalance Service, and not assess FTC penalties on paths that are not constrained.