



## Transmission Services

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### **Intra-Hour Scheduling Pilot - Phase 3, V4**

#### **Response to Customer Comments**

Posted: September 26, 2011

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Intra-Hour Scheduling Pilot - Phase 3, V4, Business Practice posted for review from August 26, 2011 through September 23, 2011.

Thank you for your comments.

### **Requesting Transmission Service, V8**

#### **Response to Customer Comments**

Posted: September 26, 2011

The Requesting Transmission Service, V8, Business Practice was posted for review from August 26, 2011 through September 23, 2011.

No comments were received on this Business Practice.

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## 1. Puget Sound Energy, Inc.

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- A. By this letter, Puget Sound Energy, Inc. (“PSE”) comments on the draft Version 4 of the Intra-Hour Scheduling Pilot Program (Phase III) Business Practice, posted by Bonneville Power Administration (“BPA”) for comment (the “Draft Business Practice”). As an initial matter, PSE notes that BPA has requested comments on ten business practices, including the Draft Business Practice, within a very tight timeframe. PSE understands the desire to have the business practices in place prior to the October 1, 2011, start of the fiscal year, but the timeframes allowed by BPA do not allow sufficient time to analyze, discuss, or comment on the proposed business practices. Therefore, if BPA proceeds to implement any of these business practices, BPA should commit to reopen each of these business practices—after a few months of experience—and take comments and revise them as appropriate. PSE appreciates BPA’s efforts in drafting the Draft Business Practice and thanks BPA for the opportunity to comment and work cooperatively with BPA on these matters.

### Transmission Services’ Response

BPA appreciates that the volume of business practices out for current comment is unusually large at this time. BPA makes every effort to manage the volume of business practices to a reasonable number with appropriate timeliness. BPA has had to make changes to an unusually large number of business practices as well as create new business practices by October 1, 2011 to reflect agreements and commitments reached in our recent rate case filing and regional wind forums. BPA, as always, is willing to continue to take comments and questions on these and other business practices and considers revisions as appropriate.

BPA expects to provide updates on implementation of these business practices at upcoming Customer Forums and may schedule additional customer calls to discuss implementation and answer remaining questions.

## B. Definitions

1. **Missing Paragraph?** The redlined version of the Draft Business Practice posted to the BPA website shows the following paragraph as an insertion, but such paragraph is missing from the clean version of the Draft Business Practice posted to the BPA website:

Unless otherwise defined herein, capitalized terms are defined by Transmission Services in its Open Access Transmission Tariff (OATT) and the 2010 Transmission & Ancillary Service Rate Schedules (Rate Schedules), Federal Energy Regulatory Commission (FERC) in its Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), North American Electric Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), or their successors.

Draft Business Practice at 1-2 (redlined version). If BPA intends to insert the above paragraph into the Draft Business Practice, it should do so in the clean version as well.

### Transmission Services’ Response

Thank you for your comment. The paragraph will be inserted in the final version.

2. **Intra-Change Transaction.** The Draft Business Practice defines the term “Schedule Request” as a “request received via e-Tag to create or modify an interchange or *intra-change transaction*.” Draft Business Practice at 1 (emphasis added). PSE is unfamiliar with the term “intra-change transaction” and does not recognize it as a term commonly used in the industry. BPA should define the term “intra-change transaction” and describe how an “intra-change transaction” differs from an interchange transaction.

#### Transmission Services’ Response

Thank you for your comment. BPA will change the language as suggested.

#### C. Eligibility and Applicability Criteria

Section B.2. of the Draft Business Practice states that “[n]othing in this business practice is intended to convey rights to submit Intra-Hour Schedule Requests *if a customer does not otherwise have such rights by contract*.” Draft Business Practice at 1 (emphasis added). To what contract does section B.2. of the Draft Business Practice refer?

#### Transmission Services’ Response

Thank you for your comment. Slice customers do not have the right to submit intra-hourly schedules. The intent of Section B.2 is to indicate that this business practice does not confer any rights to submit intra-hourly schedules, if a customer’s underlying agreement with BPA does not allow such schedules.

#### D. Procedures for Submitting Intra-Hour Schedules

Section B.5. of the Draft Business Practice states that BPA will, at certain times and in response to certain system conditions or operational actions, deny Intra-Hour Schedule Requests:

BPA Transmission Services will deny Intra-Hour Schedule Requests at certain times and in response to certain system conditions or operational actions, including but not limited to the following:

- a. When the net schedules on an Intertie or External Interconnection are expected to exceed the System Operating Limit (SOL).
- b. When actual flows on a Network Flowgate have exceeded or are expected to exceed the Flowgate SOL.
- c. Following a Puget Sound Area Northern Intertie (PSANI) Operational Support Generation (OSG) procedure or a PSANI Curtailment,, Schedule Request will be denied if:
  - i. The POD is one of the points listed below and the Schedule Request is for an increase
  - ii. The POR is one of the points listed below and the Schedule Request is for a decrease
  - iii. If the POR and POD are points listed below, the schedule may be allowed.
    - Alcoalntalco
    - BC.US.Border

- BPAT.PSEI
- BPAT.SCL (Zone 2 and 3 only)
- BeverlyPark
- Snohomish

Draft Business Practice at 2-3. PSE offers the following comments with respect to section B.5. of the Draft Business Practice:

1. The introductory sentence of section B.5. of the Draft Business Practice states that BPA will, at certain times and in response to certain system conditions or operational actions, deny Intra-Hour Schedule Requests. What is meant by the phrase “at certain times”? How will BPA exercise its discretion to deny Intra-Hour Schedule Requests at certain times but not others? What standards will BPA use to decide whether to deny Intra-Hour Schedule Requests?

#### Transmission Services’ Response

During the pilot, BPA reserves the right to deny intra-hour response the listed system conditions or other unknown conditions in which system reliability would be jeopardized by intra-hour schedules.

2. Should the word “following” in section B.5.c. of the Draft Business Practice above be “during”? The word “following” suggests that a Schedule Request will be denied after but not during a PSANI OSG procedure or a PSANI Curtailment.

#### Transmission Services’ Response

Thank you for your comment. BPA will change the word “following” to “during.”

3. Should the word “may” in section B.5.c.iii. of the Draft Business Practice above be “will” or “shall”? If both the POR and the POD are within the “PSANI bubble,” under what circumstances would BPA deny an Intra-Hour Schedule Request during a PSANI OSG procedure or a PSANI Curtailment?

#### Transmission Services’ Response

Thank you for your comment. BPA will change the word “may” to “will.” Schedules affected in section B.5.iii will be allowed during PSANI OSG and PSANI Curtailments.

4. If BPA were to deny Intra-Hour Schedule Requests from generating resources in response to certain system conditions or operational actions, BPA should waive both Generation Imbalance accounting and Persistent Deviation Penalties for Generation Imbalance for such generating resources for the second half of the hour in which the Intra-Hour Schedule Request would have applied. Customers should not be subject to Generation Imbalance accounting or Persistent Deviation Penalties for Generation Imbalance for any period of time during which Intra-Hour Schedule Requests would have applied if such requests were not denied by BPA.

#### Transmission Services’ Response

Thank you for your comment. Customers that are not able to submit intra-hour schedule changes due to BPA or any other approval entity continue to receive Generation Imbalance service and remain subject to Generation Imbalance accounting and Persistent Deviation Penalties.

## Requesting Transmission Service, V8

No comments were received to proposed revisions to BPA's Requesting Transmission Service Business Practice.