

November 21, 2019

Via Email

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

**Re: Comments of Avangrid Renewables, LLC on the Curtailment Methodology
for Dynamic Transfers**

Avangrid Renewables, LLC, (“Avangrid”) hereby submits comments to the Bonneville Power Administration (“Bonneville”) concerning recent changes to the curtailment methodology and curtailment calculator. Avangrid respectfully requests Bonneville allow additional process for stakeholder collaboration before proposing any additional business practice (“BP”) changes.

Bonneville provided notice via Tech Forum on October 24, 2019 (the “Notice”) that the agency had updated its curtailment calculator on October 17, 2019 (the “Modification”) to better account for dynamic transfers. The Notice explained that prior to the Modification, a reliability limit was not placed on e-Tags where the energy profile was zero. According to the notice, dynamic transfer e-Tags with an energy priority of zero now have a reliability limit of zero, meaning the e-Tag is curtailed to zero. The Notice urged customers to populate the energy profile before the scheduling interval with an accurate estimate of the transfer that will be seen in the interval.

On November 1, 2019, a separate Tech Forum email announced a November 5, 2019 conference call to provide additional clarification about the Modification (the “Call”). On the Call, Bonneville explained that prior to the Modification an e-Tag for a dynamic transfer with an energy profile of zero was not getting a reliability limit, which could have allowed non-firm dynamic transfers to have priority over firm transmission schedules. Bonneville also explained that this issue arose after its September 2019 BP revisions allowing dynamic transfers to use non-firm transmission service. After discussing the Modification with customers, Bonneville decided to allow an additional two-week comment period to allow customers to suggest further improvements to the curtailment methodology that Bonneville could incorporate into a BP proposal.

On November 7, 2019, Bonneville sent an additional Tech Forum notice summarizing the issues surrounding the Modification and asking for comment on two specific issues: 1) whether Bonneville should base curtailments of dynamic transfers on the transmission profile, the energy profile, the dynamic transfer return signal, or some other method; and 2) how Bonneville should ensure that non-firm dynamic transfers are curtailed before firm dynamic transfers. The November 7 notice indicated that Bonneville intended to revise section D.5 of its Dynamic

Transfer Operating and Scheduling Requirements BP and that, “[d]epending on the method selected” Bonneville might also revise its Redispatch and Curtailment procedures BP or other BPs.

Avangrid appreciates Bonneville’s willingness to engage with customers about its curtailment methodology for dynamic transfers. The issues discussed on the Call are significant and warrant careful consideration beyond the two-week comment period. Additional process, including at least one workshop, would allow stakeholders to better vet the options provided by Bonneville. As such, Avangrid asks Bonneville hold off proposing any changes to its BPs at this time.

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Avangrid appreciates the opportunity to submit these comments and looks forward to working with Bonneville on this issue. By return e-mail, please confirm Bonneville’s receipt of these comments.