# Response to Customer Comments – Curtailment Methodology for Dynamic Transfers

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# Response to Customer Comments – Response to Customer Comments – Curtailment Methodology for Dynamic Transfers

On Nov. 7, 2019, BPA requested comments from customers on its curtailment methodology for dynamic transfers. The comment period closed on Nov. 21, 2019. BPA's responses are below.

## A. Avangrid

Avangrid would like the comment period expanded with another workshop prior to starting Business Practice (BP) change process.

**BPA Response**
Thank you for your comments. With the benefit of your input, BPA believes it is in an improved position to propose a revised business practice. BPA will draft a revised business practice, release it for comment, and hold an additional customer meeting as part of the business practice process. This will balance the opportunity for additional customer input with the need to move forward with a solution.

## B. Idaho Power Company and PacifiCorp

Idaho and PAC requested another customer call or stakeholder workshop.

**BPA Response**
Thank you for your comments. With the benefit of your input, BPA believes it is in an improved position to propose a revised business practice. BPA will draft a revised business practice, release it for comment, and hold an additional customer meeting as part of the business practice process. This will balance the opportunity for additional customer input with the need to move forward with a solution.

There were questions on which profiles are used for each type of tag for normal hour-ahead schedule curtailments. Also, what kind of tags are flowing in the opposite direction? They recommend using energy profile of normal e-Tags and not use dynamic pseudo-tie or capacity.

**BPA Response**
For hour-ahead curtailments on internal flow-based paths, the energy profile is used. E-Tags providing counterflow are not curtailed; however, the energy profile of these tags is used when creating the flow forecast. BPA feels that since these curtailments are to keep total forecasted flow below an operational limit, the energy profile for all e-Tags is the input to the flow forecast.

The 1:1 paths (scheduled path) curtailments prior to the hour are based on transmission profiles relative to the new TTC.

There were comments on curtailing to a net path limit rather than figuring out the amount to curtail by. They also recommend incorporating the real time signals for all dynamic transfers across the flowgate in order to incorporate those values into the curtailment in order to understand the relief. They do not recommend what the input should be for the curtailment itself (transmission profile, energy profile, real-time dynamic signal).

**BPA Response**
Before the hour curtailments do curtail to the net path limit because they are only to bring the total flows down to the limit. For real-time curtailments, the amount to be curtailed is the key

because these curtailments are to lower the flow across the transmission path so the only input to the curtailment calculator is the amount of reduction needed.

BPA should explore the relationship between the curtailment methodology and the coordinated transmission agreement.

**BPA Response**
BPA agrees to look into the relationship between the curtailment methodology and the coordinated transmission agreement.

## C. Powerex

Powerex recommends that the transmission profile be utilized to determine the curtailment amount for reliability purposes for dynamic and capacity schedules.

**BPA Response**
Thank you for your comments. BPA will explore using the transmission profile for dynamic transfer and capacity schedule curtailments.

## D. Puget Sound Energy and Avista

Puget and Avista recommends BPA explore using real time dynamic transfer return signals (or other real-time equivalent information) as a basis for determining pro-rata transmission curtailments.

**BPA Response**
Thank you for your comments. BPA will explore using the real time dynamic transfer return signals or other real-time equivalent information as the basis for determining pro-rata transmission curtailments.

BPA should explore the relationship between the curtailment methodology and the coordinated transmission agreement.

**BPA Response**
BPA agrees to look into the relationship between the curtailment methodology and the coordinated transmission agreement.

## E. TransAlta

TransAlta requests a stakeholder meeting similar to what would be conducted for a Category B BP modification with BPA experts who can speak about the curtailment calculator.

**BPA Response**
Thank you for your comments. With the benefit of your input, BPA believes it is in an improved position to propose a revised business practice. BPA will draft a revised business practice, release it for comment, and hold an additional customer meeting as part of the business practice process. This will balance the opportunity for additional customer input with the need to move forward with a solution.

TransAlta asked the following questions:

1. Are there technical or system limitations that should be considered in addition to the potential solutions?
2. The proposed solutions would be equally capable of issuing curtailment on a non-discriminatory and pro rata basis, correct?
3. TEMUS presumes that utilizing the dynamic transfer return signal is feasible for real-time curtailments only. Is it true that another method would have to be employed for future-

hour curtailments?

4. Regarding question number two, how does the method for curtailing dynamic firm and non-firm transfers differ from standard e-Tags? It is unclear why dynamic e-Tags cannot be similarly ranked by NERC priority and curtailed non-firm first, followed by firm, as necessary, if further relief is needed.

**BPA Response**

Answers:

1. Most solutions will be technically feasible; however, the more intricate the solution the longer it will take to program it.
2. Yes
3. Yes, the real-time return signal is feasible for real-time curtailments only. A different input will be needed for future-hour curtailments
4. BPA does rank dynamic e-Tags similarly as standard e-Tags and does curtail non-firm first followed by firm if necessary.

## F. Seattle City Light

Seattle recommends that all transmission schedules be curtailed pro rata based on transmission profile. For dynamic transfers, they recommend BPA utilize the dynamic signals for calculating pre-curtailment energy.

**BPA Response**

Thank you for your comments. BPA will explore using transmission profiles for all schedules with the calculated relief for dynamic transfers utilizing the dynamic signals.

## G. Portland General Electric

Portland requests another customer call or stakeholder workshop.

**BPA Response**

Thank you for your comments. With the benefit of your input, BPA believes it is in an improved position to propose a revised business practice. BPA will draft a revised business practice, release it for comment, and hold an additional customer meeting as part of the business practice process. This will balance the opportunity for additional customer input with the need to move forward with a solution.

They questioned the basis for determining the amount of curtailment for each type of e-Tag (transmission profile, energy profile, reliability profile or combination).

**BPA Response**

BPA curtails all e-Tags based on the energy profile or reliability profile, whichever is less.

They recommend BPA utilize the real-time dynamic transfer return signal (or other real-time equivalent information) for real-time (within hour) pro rata curtailments and the transmission profile for all schedules for curtailments prior to the operating hour.

**BPA Response**

BPA will explore utilizing the real-time signal for in-hour curtailment for dynamic transfers and transmission profile for curtailments prior to the operating hour.