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**Subject: TransAlta Comments on Curtailment Methodology for Dynamic Transfers**

Matt:

By its November 7, 2019 Tech Forum notice, BPA requested comment on methodologies for curtailing dynamic transfers. TransAlta Energy Marketing (U.S.) Inc. ("TEMUS") is a transmission customer impacted by modifications BPA implemented in October to reliability limits on dynamic transfers. We participated in the November 5, 2019 conference call, which clarified updates made to the curtailment methodology and curtailment calculator. During the call, staff focused on the genesis of the problem and why, from BPA's point of view, the October modification had to be made despite being an imperfect temporary solution. The short call could not include much discussion about potential alternative solutions.

TEMUS supports BPA's desire to implement an improved method for curtailing dynamic transfers. We appreciate the opportunity to provide comment, but at this time, TEMUS is not ready to answer the two questions posed in the November 7, 2019 Tech Forum request without more information about the proposed solutions and maybe other solutions that may be available.

Instead, TEMUS requests a stakeholder meeting, similar to what would be conducted for a Category B business practice modification, with BPA experts who can speak about the curtailment calculator. TEMUS wants to better understand the proposed methodologies and answer 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.

**TRANSALTA ENERGY MARKETING (US) INC.**

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