

**Portland General Electric Comments  
Submitted November 21, 2019**

Portland General Electric Company (PGE) appreciates the opportunity to provide comments on Bonneville Power Administration's (BPA) Modification to the Curtailment Methodology that took effect on October 17, 2019. BPA's recent modification to the curtailment calculator to better account for dynamic transfers on their system was required to ensure that firm dynamic schedules were not given a lower curtailment priority than non-firm schedules. These comments focus on principles or approaches that BPA should follow in curtailing dynamic transfers, in part because PGE does not have a clear understating of all the moving parts within the curtailment calculator and how it is implemented, nor the technical hurdles BPA must overcome to modify the methodology for curtailing dynamic transfers.

**1. Request for Clarification**

PGE would like clarification on the method BPA uses for any curtailments prior to the operating hour. Specifically, what is the basis (transmission profile, energy profile, reliability profile or a combination) for determination of the amount of curtailment for each type of e-Tag (static, capacity, dynamic, or pseudo tie)?

**2. Curtailments should be performed in accordance with the BPA OATT, Business Practices and industry standards.**

BPA curtailment methodology should be non-discriminatory and consistent with BPA's OATT,<sup>1</sup> specifically Section 13.6, which states:

. . . .Curtailments will be made on a non-discriminatory basis to the transaction(s) that effectively relieve the constraint. . . . If multiple transactions require Curtailment, to the extent practicable and consistent with Good Utility Practice, the Transmission Provider will curtail service to Network Customers and Transmission Customers taking Firm Point-To-Point Transmission Service on a basis comparable to the curtailment of service to the Transmission Provider's Native Load Customers. All Curtailments will be made on a non-discriminatory basis, however, Non-Firm Point-To-Point Transmission Service shall be subordinate to Firm Transmission Service. Long-Term Firm Point-To-Point Service subject to conditions described in Section 15.4 [Obligation to Provide Transmission Service that Requires Expansion or Modification of the Transmission System, Redispatch or Conditional Curtailment] shall be curtailed with secondary service in cases where the conditions apply, but otherwise will be curtailed on a pro rata basis with other Firm Transmission Service. . . . .

(Emphasis added.) Non-firm transmission should be curtailed prior to firm transmission and firm transmission should be curtailed pro rata, regardless of schedule type. PTP dynamic transfers should be curtailed on a pro rata basis with other firm PTP whether on a static, capacity, dynamic, or pseudo-tie type e-tag.

---

<sup>1</sup> Available at <https://www.bpa.gov/transmission/Doing%20Business/Tariff/Documents/bpa-oatt-TC-20-settlement-tariff-100119.pdf>

However, BPA's current methodology utilizes the energy profile for dynamic schedules when calculating the reliability limit, which can result in discriminatory treatment of dynamic schedules. Moreover, use of the energy profile incentivizes customers to submit inflated energy profiles to avoid/minimize curtailment, contrary to BPA's request that customers submit an accurate estimate of the expected transfer during the scheduling interval.

For determination of real-time (*i.e.*, within hour) pro-rata curtailments, BPA should use the real-time dynamic transfer return signal (or other real-time equivalent information), as the return signal accurately represents the real-time generator output, EIM transfer dispatch, or any other transfer value impacting the source and sink BA control equations. In contrast, the energy profile associated with dynamic transfers is the transmission contract holder's *discretionary estimate* of the energy transfer for the scheduling interval, and likely will not equate to the actual energy transfer during the scheduling interval. Meanwhile, the energy profile of the static and capacity e-Tags could continue to be the basis for calculated

For determination of pro-rata curtailments prior to the real-time operating hour, BPA should use the transmission profile, rather than the energy profile, for all transmission schedules regardless of schedule type. This approach is equitable, as the tagged transmission rights indicate the requested amount of transmission capacity for utilization, whether on a static, capacity, dynamic or pseudo-tie type e-Tag.

### **3. Request for additional stakeholder engagement.**

BPA's transmission plays a vital and central role in the region, and it is important that BPA curtailments of dynamic transfers are non-discriminatory and facilitate the efficient use of BPA's system. These suggested modifications are intended to increase accuracy of modeled flow relief and result in more equitable treatment of transmission customer e-Tag types. However, these are technical and complicated issues ill-suited for resolution solely through written comments. Accordingly, PGE requests that BPA host an additional workshop(s) or customer call to discuss these and other comments received on this issue, so that customers can assist BPA in arriving at a just and reasonable dynamic transfer curtailment methodology consistent with the BPA's OATT.