SCL Comments Regarding BPA Curtailment Methodology for Dynamic Transfers

Introduction

SCL appreciates BPA's transparency regarding its current curtailment methodology for dynamic transfers, effective October 17, and willingness to consider alternative methodologies. SCL views the curtailment methodology from two aspects (1) performing curtailment of transmission schedules in accordance with BPA OATT, Business Practices, and industry standards; and (2) accurately calculating expected flow relief. Aspect (1) determines which schedules are curtailed and by what quantities, namely pro rata, while aspect (2) determines the overall magnitude of schedule curtailments necessary to achieve the necessary reduction in flow on the overscheduled or congested path.

Aspect (1) – performing curtailment in accordance with BPA OATT, Business Practices, and industry standards

SCL suggests that all transmission schedules regardless of schedule type be curtailed pro rata based on transmission profile, rather than energy profile. This is an equitable approach, 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.

Aspect (2) – accurately calculating expected flow relief

SCL understands that presently BPA calculates pre-curtailment flow impacts for internal paths based on the energy profile multiplied by the Power Transfer Distribution Factor (PTDF) of the e-Tag source and sink for the applicable path, while the flow relief is modeled as a corresponding increase in generation from the sink BA responding to the curtailment. This group of generation that responds to curtailments is defined by BPA and may be customized based on BAA input to list those generators that typically respond to such events for a given BAA, namely regulating and/or flexible resources. For SCL, the group of generators that respond to all curtailments should be modeled as SCL Ross and SCL Diablo generation. The effective flow relief is calculated as the difference between the pre-curtailment flow impacts and the increased generation responding to the curtailment.

SCL suggests that BPA solicit BAA input on the calculation of pre-curtailment flow impacts, such that the flow of various transmission schedules is more accurately modeled. For example, if a pseudo-tie schedule is delivering a generator output dynamically to a BAA while that same generator is participating in the EIM, the corresponding dynamic schedule EIM transfers for the BAA may transfer some of that same generator output from the BAA to the greater EIM footprint. Such an example is becoming common in the BPA transmission system and impacts the effective flow relief calculations, as e-Tag source and sink pairs do not necessarily indicate the ultimate generating source and load sink.

Additionally, SCL suggests that BPA utilize dynamic signals associated with pseudo-tie and dynamic schedule type e-Tags for calculating pre-curtailment energy rather than the energy profile, as these dynamic signals accurately indicate the real-time generator output, EIM transfer dispatch, or any other transfer value impacting the source and sink BA control equations. Meanwhile, the energy profile of static and capacity e-Tags could continue to be the basis for calculated pre-curtailment energy.

Conclusion

These suggested modifications will greatly enhance BPA's curtailment methodology and more equitable treatment of transmission customer schedules. An enhanced curtailment methodology will increase the accuracy of modeled flow relief and more accurately address emerging transmission utilization such as market schedules.