

March 11, 2019

Submitted via email to: techforum@bpa.gov

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**Re: Comments of Point-to-Point Customers to February 26 Hourly Firm
Evaluation Planning Workshop**

These comments are submitted on behalf of a sub-group of “Point-to-Point Customers” or “PTP Customers.”¹ PTP Customers appreciate the opportunity to provide comments on the Hourly Firm Evaluation Straw Plan discussion that was held on February 26, 2019. PTP Customers continue to digest Bonneville’s proposed framework of the details for the data elements and reports that Bonneville will make available to meet the analysis described in the TC-20 Settlement.

We remain committed as a customer group and are collectively willing to make every effort to collaborate with Bonneville on Bonneville’s monitoring and evaluation of the hourly firm product. We understand that the monitoring and evaluation results will be used to determine if the hourly firm status quo should be changed in the TC-22 proceeding per section 2(c) of TC-20 Settlement Agreement, which states:

Bonneville may propose a change from this status quo during the TC-22 proceeding after:

- i. Bonneville identifies hourly firm service as (1) A demonstrable adverse reliability risk, (2) A more than de minimis adverse impact to firm transmission service, or (3) In conflict with the then applicable market rules; and*
- ii. Bonneville engages in best efforts to come to a collaborative solution that mitigates the identified risks/impacts of hourly firm service with customers.*

At this point, we do not have a complete framework on how best to identify value/risks/impacts that may be attributable to hourly firm service. However, we are very motivated to ensure that the evaluation of hourly firm service is comprehensive and neutral per the TC-20 settlement. Below are PTP Customers’ comments, which are categorized by process, data, and evaluation criteria.

¹ Avangrid Renewables, LLC, Avista, Portland General Electric Company, Public Utility District No. 1 of Snohomish County, Puget Sound Energy, Sacramento Municipal Utility District, Seattle City Light, Shell Energy North America, and Transalta Energy Marketing (U.S.) Inc.

Process

PTP Customers request that Bonneville set aside additional time for collaboration because a single round of comments followed by the planned April 11th meeting is insufficient for designing and implementing an hourly firm evaluation. PTP Customers recommend two significant changes to the process. First, capitalize on the end of *ex parte* rules and adopt a workgroup to brainstorm evaluation criteria. The workgroup would be open to anyone interested in participating. It would serve to supplement the workshop/comments cycle and streamline the process by aggregating common recommendations. Forming a workgroup would not preclude parties from collaborating individually as they see fit. BPAT’s feedback on the frequency at which it can accommodate workgroup meetings will be very helpful. Ideally, the workgroup would meet one to two times per week with a progress report at least once per month but potentially as frequently as two times per month.

Second, adopt a new evaluation schedule to develop and reach consensus with customers on a plan and criteria for the evaluation, plus data needed to support the evaluation. This new schedule would start by adding an hourly firm segment to the upcoming TC-20 Implementation meeting as described in the table below.

Date	Task
January	Data collection began
February 26th	1st customer workshop to look at initial draft evaluation plan (materials sent 1 week before)
March 19	Add an hourly firm agenda item at the end of the existing TC-20 meeting so BPA and customers can discuss plans and criteria for the hourly firm evaluation plus data needed to support it.
April 11th	2nd customer workshop to review proposal and plan (materials sent 1 week before)
Early May	3rd customer workshop
Late May??	Post evaluation plan for comment
Late June ??	Post final evaluation plan
September 2019 March 2020 June 2020	Evaluation results workshops

Data

PTP Customers appreciate the effort Bonneville has already put towards gathering data necessary to properly evaluate hourly firm service. Data BPA has proposed is an excellent start, but given its large volume, PTP Customers are still evaluating and the following comments are being provided as initial and immediate reactions.

Capturing the right data is essential for an impartial, repeatable, and ultimately successful evaluation. Bonneville should expect more comments about data from PTP Customers as the process continues.

1. PTP Customers support narrowing the hourly firm analysis initially by focusing on actual curtailment events in order to help identify the magnitude of the problem BPA seeks to address. Additionally, it would be helpful to collect data on those events to truly understand problem areas where congestion and curtailment are most common.
2. For those curtailment events, the information on Slides 25 and 26 is very helpful, but presenting it graphically, by event, is essential. For example, a graph showing percentages (slide 25) and another showing products curtailed (slide 26).
3. The POR/POD-based approach is helpful. We think they can be grouped by POR/POD combination, where the path meets a specific distribution factor on problem flowgates. For example, group data by POR/POD combinations that meet a certain distribution factor threshold, on problematic flowgates, for congestion events requiring operator action. Additionally, consider POR/POD combinations grouped for NOEL, SOA, and WOCN. The number of events could be limited to congestion events that occurred both with no contingencies and with N-1/credible N-2 contingencies occurring. Lastly, events initiated by non-credible contingencies could be excluded.
4. It is also helpful to understand the product usage pattern for both NT and PTP at the time of the curtailments and the associated ATC/AFC at the time of firm curtailments. Because of the volume of data, this could be narrowed down to the subset of flowgates and POR/POD combinations as described in item 3 above.
5. Curtailment data is well-organized. Can other grid information, like outages and other extenuating circumstances, be linked to curtailment events? For example, tie narrative elements, like outage and dispatcher logs, to the curtailment data in the spreadsheet. Narrative data could include planned and unplanned outages, peak load events, and generation contingencies. These would be best added in their own sortable fields instead of combining them in a generic "Notes" field.
6. PTP Customers believe that currently unrelated initiatives, like new Reliability Coordinator services from CAISO and potential changes to the flow forecast model, could influence how curtailments are issued in the future. Bonneville should confirm with Customers whether and how such initiatives factor into hourly firm's evaluation.

Evaluation Criteria

Like the above, PTP Customer comments about evaluation criteria are based on our initial discussion since the February 26th forum and should be considered preliminary. We also note that the hourly firm evaluation is uncharted territory for Bonneville and customers alike and we are ready to collaborate on its development starting with these comments.

1. PTP Customers believe that curtailment events are objective and supported by data. Conversely, we are very concerned about subjective criteria Bonneville has

mentioned in previous workshops, like "increased efforts" required of BPA staff, which may or may not be attributable to offering hourly firm service. We request that BPA take a first step for the March 19th TC-20 Implementation meeting and explain the need for subjective evaluation criteria. What data will be used to support the evaluation?

2. For objectively evaluating curtailment events, PTP customers suggest the following method.
 - a. Study actual curtailments and the state of the system when they occurred and consider including events when flows were within 10% of System Operating Limits.
 - b. Confirm that the events impacted firm service by eliminating those where cutting non-firm schedules relieved congestion.
 - c. Confirm whether hourly firm sales did or did not exceed posted Available Transfer Capability (pre/post type analysis) and remove those events where hourly firm sales were within ATC limits.
 - d. Evaluate extenuating circumstances, such as physical grid issues beyond N-1 and studied contingencies and remove those events that were inevitable due to system configuration.
 - e. Conduct the analysis and calculate statistics based on the curtailment events that remain.
3. For any evaluation criteria that depend upon ATC data, PTP Customers are concerned that historic ATC may include default zero values that were used like transmission reliability margins, instead of actual ATC posted based on actual calculation. Proxy ATC values would have to be used in these cases, if any.

Thank you for considering our comments. We look forward to collaboratively working with you on the hourly firm evaluation.