

From: Dmitry Batishchev
Sent: Wednesday, February 8, 2023 11:35 AM
To: Tech Forum <techforum@bpa.gov>
Subject: [EXTERNAL] "Redispatch & Curtailment on 1:1 Paths."

To whom it may concern,

We are commenting in response to BPA staff's proposal at "Redispatch and Curtailments on 1:1 paths" meeting held on January 18, 2023 to amend BPA current OATI CM calculation and reporting to align with a schedules based curtailment calculation on 1:1 paths.

Our recommendation is to retain Status Quo: Curtail by **TSR Limits & E-Tags**.

Reasoning:

BPA's staff proposal to curtail by schedules within OATI (E-Tag) incentivizes customers to schedule without consideration of their reliability limits. This type of scheduling will increase transmission curtailments in real-time if customers do not schedule to their reliability limits and will disadvantage customers following their transmission rights' reliability limits.

Example:

Let's assume 1:1 path has 200 MW of TTC and it is sold as firm to 2 entities, 100 MW each.

On a day-ahead basis 1:1 path gets derated to 100 MW (50%) TTC.

Reliability limits for both entities are now 50 MW (50%) each.

Entity A schedules 50 MW (their reliability limit), while entity B schedules 100 MW (above their reliability limit) on a day-ahead basis.

1:1 path's TTC limit stays at 100 MW in real-time.

Below are the two different outcomes based on Status Quo (1) and BPA's staff proposal (2)

- 1) Status Quo curtailment process: entity A's 50 MW schedule does not get curtailed, while entity B schedule gets curtailed to its reliability limit of 50 MW
- 2) BPA's staff proposal process: entity A's 50 MW schedule gets curtailed to $100/150 \times 50 = 33$ MW (17 MW **below** its reliability limit), while entity B's 100 MW schedule gets curtailed to $100/150 \times 100 = 67$ MW (17 MW **above** its reliability limit)

Respectfully,

Dmitry Batishchev
Transmission Specialist

