

February 8, 2023

Via email:
techforum@bpa.gov

U.S. Department of Energy
 Bonneville Power Administration
 Transmission Services

Re: Comments of Puget Sound Energy, Inc. Regarding 1:1 Path Curtailments

Puget Sound Energy, Inc. (“PSE”) submits the following comments on the BPA January 18, 2023 presentation on Redispatch and Curtailment BP 1:1 Path Curtailments.¹

BPA has requested comments by February 8, 2023. However it is still unclear how BPA would implement 1:1 curtailments under various circumstances. Therefore, --

- (i) BPA should provide more examples that describe how BPA would implement 1:1 curtailments under various circumstances, including varying combinations of NT and PTP customers; and varying combinations of firm and non-firm reservation priorities. The BPA-provided scenario involving a NT and PTP customer in the January 18 Presentation seems to have an inequitable outcome under the proposed Alternative 1 implementation, where the PTP customer is disproportionately curtailed based on the NT customer’s over-scheduling decision.
- (ii) BPA should comment on and address an additional customer-provided example that includes four customers with differing tagging decisions under the proposed Alternative 1 implementation when a path is derated for a given hour in day ahead, resulting in the following inequitable outcome:

E-Tag Based Curtailment post OATI Amendment Example #2: generic 1:1 path, assume ALIS rating of 400MW, outage curtailed to 200MW, shared by four customers							
Step 1	Step 2	Step 3	Step 4	Totals			
TSR Limits	TSR Reliability Limit (non-binding)	E-Tag Creation	E-Tag Curtailment	Resulting Flow	Total Curtailment	Impact %	
TSR Limit	Day-Ahead Advisory	Day-Ahead Submission	Real-Time Curtailment				
Customer 1 (Firm PTP)	100	50	50	-10	40	-60	30%
Customer 2 (Firm PTP)	100	50	100	-20	80	-20	10%
Customer 3 (Firm PTP)	100	50	50	-10	40	-60	30%
Customer 4 (Firm NT)	100	50	50	-10	40	-60	30%
Total	400	200	250	-50	200	-200	100%

¹ Available at <https://www.bpa.gov/-/media/Aep/transmission/nt-service/rand-cbp-1-1path-customer-meeting.pdf> (“January 18 Presentation”).

- (iii) BPA should allow two weeks for further comments after BPA provides the requested additional examples and comments on the above-described customer-provided example. In addition, BPA should host a collaborative workshop with PTP and NT customers to discuss alternative approaches and solutions for 1:1 path curtailments.
- (iv) Based on the information provided to date, BPA should not implement Alternative 1 and should consider other mechanisms to address the following issue: Alternative 1 results in disproportionate and unequitable curtailments to a customer when another customer overschedules contractual transmission rights, as BPA demonstrated in the example discussed at the January 18 meeting.
- (v) Further, PSE would recommend keeping Status Quo in place and eliminating the ability of a transmission customer with applicable contracts (*i.e.*, NT or other) to use No Demand (ND) Scheduling Validations on any 1:1 interties.
- (vi) If BPA is going to implement changes to its Redispatch and Curtailment procedures, PSE encourages BPA to adhere to the FERC approved pro-forma OATT principles and implement curtailments on a fair, pro-rata basis, in alignment with how other Transmission Providers in the West manage curtailments.

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PSE appreciates BPA's review of these comments. By return e-mail, please confirm BPA's receipt of these comments.

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