

Via Email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

## Shell Energy comments to BPA's Concurrent Loss Return Customer Workshop

Shell Energy North America (US), L.P. (Shell Energy) appreciates the opportunity to provide comments and feedback to BPA's Concurrent Loss Return Customer Workshop held 8 December 2021. We have concerns regarding a truly "concurrent" service and the difficulty of returning losses without incurring EIM charges, given the tight scheduling timeframes. Shell Energy requests BPA also develop a one hour delayed loss return to account for these timelines.

### **1. How BPA's proposed tagging policy will impact scheduling/tagging procedures:**

- a. A loss calculation prior to each flow hour will create a significant burden on scheduling (especially VERs)
  - i. If Losses are to be returned from BPA BA source, then the loss tag will need to be created by T- 57 to avoid EIM imbalance charges
  - ii. In order to give time for BPA to calculate the aggregate loss value each hour, all hourly tags would need to be created no later than T - 60
    1. This would leave 3 minutes for BPA's loss calculation to occur, be communicated to customers, and for the customer to tag the loss return.
      - a. This timeline is untenably short
  - iii. VER forecasts are published by BPA at approximately T - 72
  - iv. Using the scenario above, this would leave only 12 minutes (or less if the forecast is late) to tag the VER schedule.
- b. A loss calculation prior to each flow hour will alter the overall tagging deadline once BPA is in the EIM
  - i. EIM tagging deadline without incurring imbalance charges is T - 57
  - ii. If losses are to be calculated prior to each flow hour, ALL tags would need to be created by at least T - 60 (same as the scenario above)
  - iii. This creates an artificial deadline that differs from the industry standard

### **2. Hourly carry forward of KW remainders/loss return imbalance**

- a. Shell Energy has no specific feedback for calculating remainders and imbalance with concurrent loss return

### **3. Shell Energy Recommendations**

- a. Offer a delayed loss return service of one hour in addition to the truly concurrent option
  - i. Alleviates the timing issues noted in bullet #1
  - ii. Allows for rolling in any accumulated KW remainders
  - iii. Accurately reflects losses based on final flow rather than estimated (e.g. final flows may differ from estimated given the nature of curtailments, in-hour tag changes, dynamic schedules, pseudo-ties, etc.)

- iv. Improves time for final loss calculation by BPA to be communicated to customers
- v. Gives more time for participants to procure loss-return transmission and tag aggregated loss tag

Respectfully submitted,

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