

November 21, 2019

Via email:

techforum@bpa.gov

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

**Re: Comments of Puget Sound Energy, Inc. and Avista Corporation Regarding
BPA Curtailment Methodology for Dynamic Transfers**

Puget Sound Energy, Inc. and Avista Corporation (“Commenting Parties”) submit the following comments on BPA’s curtailment methodology for dynamic transfers, in response to BPA’s November 7, 2019 email from Tech Forum (“Request for Comments”) requesting such comments.

1. Introduction

These comments focus primarily on principles or approaches that BPA should follow in curtailing dynamic transfers, in part because Commenting Parties do not at this time have a detailed understanding of the system and technical hurdles that BPA must overcome in developing an improved methodology for curtailing dynamic transfers that is non-discriminatory and consistent with BPA’s OATT.

With regard to the specifics of revising BPA’s curtailment methodology, the comments being submitted today by PacifiCorp with others lay out an approach that merits consideration, and Commenting Parties urge BPA to do so.

**2. BPA Should Curtail on a Non-Discriminatory Basis and Consistent with its
Tariff: Non-Firm Transmission Should Be Curtailed Before Firm
Transmission and Firm PTP Dynamic Transfers Should Be Curtailed Along
With Other Firm PTP on a Pro Rata Basis**

BPA’s curtailment methodology should be non-discriminatory and consistent with BPA’s Tariff. BPA’s Tariff¹ Section 13.6 includes the following:

. . . . Curtailments will be made on a non-discriminatory basis to the transaction(s) that effectively relieve the constraint. . . . If multiple transactions require Curtailment, to the extent practicable and consistent with Good Utility Practice, the Transmission Provider will curtail service to Network Customers and Transmission Customers taking Firm Point-To-Point Transmission Service on a basis comparable to the curtailment of service to the Transmission Provider’s Native Load Customers. All Curtailments will be made on a non-discriminatory

¹ Available at <https://www.bpa.gov/transmission/Doing%20Business/Tariff/Documents/bpa-oatt-TC-20-settlement-tariff-100119.pdf>.

basis, however, Non-Firm Point-To-Point Transmission Service shall be subordinate to Firm Transmission Service. Long-Term Firm Point-To-Point Service subject to conditions described in Section 15.4 [Obligation to Provide Transmission Service that Requires Expansion or Modification of the Transmission System, Redispatch or Conditional Curtailment] shall be curtailed with secondary service in cases where the conditions apply, but otherwise will be curtailed on a pro rata basis with other Firm Transmission Service. . . .

(Emphasis added.) In short, BPA should curtail non-firm transmission before firm transmission and should curtail on a non-discriminatory basis; BPA's firm PTP dynamic transfers should be curtailed along with other firm PTP on a pro rata basis and should not be subject to curtailment before other firm PTP.

BPA's current methodology improperly uses the dynamic transfer energy profile in setting the reliability limit for the dynamic transfer and sets the reliability limit on dynamic transfers to zero if the energy profile is zero. BPA's current methodology discriminates against dynamic transfers, and BPA is to be commended for commencing a process to review its curtailment methodology. BPA's transmission plays a vital and central role in the region, and it is important that BPA curtailments of dynamic transfers are non-discriminatory and consistent with BPA's Tariff.

3. BPA Should Ensure that Non-Firm Transmission (Including Dynamic Transfers) Is Curtailed Before Firm Transmission (Including Dynamic Transfers) by Developing Curtailment Systems and Software that (i) Identify Transmission Schedules as Firm or Non-Firm and (ii) Allow for a Different Curtailment Priority for Firm and Non-Firm Transmission

In response to question 2 in the Request for Comments, BPA should ensure that non-firm transmission (including dynamic transfers) is curtailed before firm transmission (including dynamic transfers) by developing curtailment systems and software that (i) identify transmission schedules as firm or non-firm and (ii) allow for a different curtailment priority for firm and non-firm transmission. This should facilitate curtailments that are consistent with BPA's Tariff and are non-discriminatory.

4. BPA Should Explore Using Real Time Dynamic Transfer Return Signals (or other Real-Time Equivalent Information) as a Basis for Determining Pro-Rata Transmission Curtailments

BPA should explore using real time dynamic transfer return signals (or other real-time equivalent information) as a basis for determining pro-rata transmission curtailments. In any event, BPA's objective should be to quickly and effectively reduce net schedules to within the necessary limits in a fair and unbiased manner taking into account tag priorities and curtailing based on standard metrics. Commenting Parties look forward to further discussions with BPA on this important topic.

If BPA believes curtailment for future hours is required,² BPA should explore with its customers the circumstances and specifics of any such requirement and the appropriate curtailment metric for calculating such curtailments.

5. BPA Should Explore the Relationship between its Curtailment Methodology and the Coordinated Transmission Agreement

The relationship between BPA's curtailment methodology and the Coordinated Transmission Agreement is unclear, and BPA should explore this relationship with its customers.

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Nothing contained in these comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or provided under BPA's Tariff or otherwise under contract. Commenting Parties appreciate BPA's review of these comments and consideration of the recommendations contained herein. By return e-mail, please confirm BPA's receipt of these comments.

² For future hours, TLR avoidance should help reduce potential congestion.