Transmission Services

Customer Comments on the Network Open Season Cluster Study & Redirects

Comments Received from
Portland General Electric
April 29, 2010

Posted May 10, 2010

From: John Jamieson
Sent: Thursday, April 29, 2010 9:07 AM
To: Tech Forum
Subject: Response to Cluster Study Assumptions

PGE response to Issue #1: PGE agrees with BPA's recognition that continued reliance on reducing eastside hydro is unstatainable. In fact, we are concerned that the 2008/2009 NOS reliance on reducing eastside hydro to accommodate new transmission requests has already allowed firm transmission sales that do not reflect actual use of the system. For example, the 2008/2009 NOS assumed reduction of eastside hydro to accommodate new resources when in fact it is more economic to displace the highest heat rate plants, which are generally located on the west side. Any reduction in Westside generation results in increased flows Cross Cascades thereby increasing the risk of curtailment of to current firm transmission holders.

With regard to issue #1, PGE believes it is unrealistic to require the LSE or almost anyone else to pre-specify precisely which plants will be displaced. Instead, the analysis should recognize that a capacity market will develop in the northwest and BPA's analysis should be designed to reflect that market. We believe an economic dispatch model (merit order) which recognizes general plant constraints such as ramp rates should be used.

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Customer Comments on the Network Open Season Cluster Study & Redirects

Comments Received from
Portland General Electric
May 7, 2010

Posted May 10, 2010

From: James Eden
Sent: Friday, May 07, 2010 12:01 PM
To: Tech Forum
Subject: Comments on Alternatives for Cluster Study Assumptions

Portland General Electric appreciates the opportunity to provide comments to BPA regarding the Alternatives for Cluster Study Assumptions.

The Cluster Study process needs to consider several assumptions relative to providing transmission service for non-dispatchable renewable resources like wind, especially in light of the volume of requests to BPA for this service. Currently, BPA looks at a single seasonal "snapshot" with all wind on and the redispatch assumption includes displacement on the FCRPS. I believe additional redispatch scenarios should be considered. In PGE's case, we have secured transmission service from PGE's Biglow Wind Farm (450 MW) to PGE's service territory. If the wind forecast is for high wind output, PGE will redispatch its resource portfolio and contract options to meet load-resource balance. This may include reducing higher cost thermal plants which are primarily located on the west side of the Cascade Mountains near our load center. This later condition is but one option PGE might exercise. This condition may be replicated in the PNW by other utilities that have higher cost thermal plants on the west side while accessing their wind resources on the east side. A scenario that considers this should be included in the cluster studies.

The current REBA analysis should influence the redispatch assumptions, however, I do not believe that a PNW capacity market is modeled in the REBA effort. In the 2009 REBA analysis, much of the redispatch occurs external to the PNW region and may not be consistent with the associated transmission requests. As I discussed above, I believe that much of the redispatch due to in-region wind will involve higher cost thermal units in the PNW.

Jim Eden
Consulting Transmission Engineer
Portland General Electric