

June 25, 2019

Via email:

techforum@bpa.gov

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

Re: Comments of Avista Corporation, PacifiCorp, Portland General Electric Company, and Puget Sound Energy, Inc. Regarding BPA Draft Available Transfer Capability (ATC) Methodologies for the Planning Time Period, Version 15 Business Practice

Avista Corporation, PacifiCorp, Portland General Electric Company, and Puget Sound Energy, Inc. (“Commenting Parties”) submit the following comments on the BPA draft Available Transfer Capability (ATC) Methodologies for the Planning Time Period, Version 15 Business Practice (“Draft”).¹

A. Reference to Specific Rate Schedules for Definitions

The Draft proposes the following change in the first sentence of section 2:

Unless otherwise defined herein, capitalized terms are defined in BPA’s Open Access Transmission Tariff (OATT), ~~current~~ 2012 Transmission & Ancillary Service Rate Schedules ~~or successor rate schedules~~ (Rate Schedules), the Business Practices, Federal Energy Regulatory Commission (FERC) Standards and Communication Protocols for OASIS, and/or the North American Electric Reliability Corporation (NERC) Glossary of Terms.

It is our understanding from the discussion at the June 13, 2019 BPA TC-20 Settlement Customer Workshop that BPA is proposing this change to specify (2012) rate schedules to ensure accuracy as to the definition of terms defined by reference to definitions in rate schedules. This desire for accuracy is understandable, but BPA should consider whether there are rate schedules more recent than 2012 that contain the definitions to be defined by reference and that can be specified.

B. Punctuation Change to Distinguish Between OATT Services and Grandfathered Services

In section 3.1 of the Draft, a comma should be added as follows after the word “other” in order to avoid an inference that OATT services are considered “grandfathered services”:

¹ Available at <https://www.bpa.gov/transmission/Doing%20Business/bp/Redlines/Redline-ATC-Methodologies-Planning-Period-V15.pdf> .

BPA owns the Federal Columbia River Transmission System (FCRTS). Transmission Services provides Transmission Service over the FCRTS under its OATT and other grandfathered contracts.

C. Treatment of Counterflows in ATC Methodology

The treatment of counterflows in the Draft should be clarified and should be consistent with the treatment with the ATC methodology specified in the BPA OATT. In this regard, Attachment C (Methodology To Assess Available Transfer Capability) of the TC-20 BPA settlement OATT² includes the following:

The Transmission Provider uses a Rated System Path (contract path) methodology to calculate ATC on external interconnections, interties and some paths internal to Bonneville's network. Under this methodology, Firm ATC = $TTC - ETC_{Firm} - TRM - CBM + \text{Postbacks} + \text{Counterflows}$. Non-Firm ATC = $TTC - ETC_{Firm} - ETC_{NonFirm} - TRM - CBM + \text{Postbacks} + \text{Counterflows}$. This methodology and a list of the paths for which ATC is calculated are described in the Transmission Provider's ATC methodology documents.

The Transmission Provider uses a Flowgate methodology on the network flowgates. Under this methodology as well, Firm AFC = $TFC - ETC_{Firm} - TRM - CBM + \text{Postbacks} + \text{Counterflows}$. Non-Firm AFC = $TFC - ETC_{Firm} - ETC_{NonFirm} - TRM - CBM + \text{Postbacks} + \text{Counterflows}$. This methodology and a list of the network flowgates are described in the Transmission Provider's AFC methodology documents.

The first sentence of section 4 of the Draft reads as follows:

The algorithm Transmission Services uses for its firm ATC determinations for Interties, External Interconnections, and Network Paths during the Planning Time Period is listed below, along with descriptions of each of the elements in the algorithm:

$$ATC_{Firm} = TTC - ETC_{Firm} - TRM$$

The first sentence of section 5 of the Draft reads as follows:

The algorithm Transmission Services uses for its firm ATC determinations for Network Flowgates during the Planning Time Period is listed below, along with descriptions of each of the elements in the algorithm:

$$ATC_{Firm} = TTC - ETC_{Firm} - \text{uncertainty margin}$$

² See https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/TC-20%20Settlement/Attachment%20to%20the%20TC-20%20Settlement%20Agreement%20Tariff%2011_08_18.pdf. The language of the BPA's current OATT is substantively the same.

Neither of these algorithms in the Draft explicitly references nor explains how counterflows are taken into account in the determination of ATC_{Firm} . The Draft should be clarified to reflect how counterflows are taken into account in the determination of ATC_{Firm} and $ATC_{NonFirm}$. The Draft proposes to add the following as a new section 4.2.6: “BPA does not include counterflows in ETC calculations for External Interconnections, Interties and Network Paths.” However, this does not explain where and how BPA takes counterflows into account in determining ATC .³

D. “Balancing Logic Method”

Section 5.2.8.3 should be revised as follows, to clarify what is meant by “Balancing Logic Method”:

Wind generators identified as PORs in PTP contracts and that require transmission service on the Federal transmission system are set at the greater of the following:

- (i) Modeled on at 100 percent of the contract demand for the wind generator;
or
- (ii) Modeled off and replaced by the “Balancing Logic Method” described in section 5.2.8.6.

E. “Uncertainty Margin”

As indicated above, the first sentence of section 5 of the Draft reads as follows:

The algorithm Transmission Services uses for its firm ATC determinations for Network Flowgates during the Planning Time Period is listed below, along with descriptions of each of the elements in the algorithm:

$$ATC_{Firm} = TTC - ETC_{Firm} - \text{uncertainty margin}$$

It is unclear how the Draft’s “uncertainty margin” is consistent with the ATC_{Firm} description--quoted above--from BPA’s Attachment C (Methodology To Assess Available Transfer Capability) of the TC-20 BPA settlement OATT, which does not reference or include an “uncertainty margin.” BPA should explain how use of an “uncertainty margin” is consistent with BPA’s OATT language or revise the Draft to remove the uncertainty margin.

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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

³ The Draft proposes to add the following as a new section 5.2.2: “Power flow analysis [in Existing Transmission Commitments (ETC) calculations] inherently includes counterflows.” This may address the treatment of counterflows in the determination of firm ATC for Network Flowgates during the Planning Time Period--but the treatment should be clarified.

recommendations contained herein. By return e-mail, please confirm BPA's receipt of these comments.