

Redispatch and Curtailment BP

- 1:1 Path Curtailments -

01/18/2023



History

On April 29, 2022, BPA revised its Redispatch and Curtailment Procedures V14 Business Practice to clarify its procedures for 1:1 path curtailments, and requested customer comment.

BPA subsequently hosted a meeting on May 9, 2022 to discuss the proposed revisions. BPA received two sets of written comments on the proposed revisions.

- The proposed business practice revisions were intended to continue with BPA's commitment to provide transparency to its customers. Proposed amendments reflect the standing default implementation of OATI Curtailment Manager.



Business Practice Amendment

Category A - Clarification

Current BP Language

Redispatch and Curtailment BP V13

“ ...
 D4. BPA Transmission Services will curtail schedules pro-rata according to NERC Curtailment priority
 ... ”

V14 BP Retracted Language

Redispatch & Curtailment BP V14 (Retracted)

“ ...
 D.4 BPA Transmission Services will implement the following four-step process for Curtailments on managed 1:1 paths:
 Step 1 - TSRs receive reliability limits on the path pro rata by NERC priority until the sum of TSR rights equal the path's Operating Limit.
 Step 2 – E-Tags are reduced to the reliability limit of their enabling TSRs.
 Step 3 – Any sum of e-Tag over cut is redistributed back to e-Tags pro rata by NERC priority until the sum of e-Tags equals the path's Operating Limit.
 Step 4 – Implement E-Tag Curtailments based on the outcome of Steps 1 thru 3.
 D.5 For Curtailments on managed flow-based paths (and when managing flows on NWACI and Satsop), BPA Transmission Services will curtail schedules pro rata according to NERC Curtailment priority.
 ... ”



Business Practice Amendment (Cont.)

Comments received requested further clarity and raised concerns relating to BPA's procedures for managing curtailments on managed 1:1 paths.

BPA committed to forming a team of subject matter experts to evaluate the existing procedures to manage curtailments on these paths. This evaluation would include:

- Review of implicated policies
- Identification of possible areas of discrepancy between BPA's tariff and current curtailment procedures
- Evaluation of alternative processes for management of these paths
- An industry scan

BPA committed to holding a customer workshop no later than six months from the date of the retraction notice to share the status of the preliminary evaluation and receive customer input.

Example of the issue:

Example Details				
Curtailed to TTC	Current TSR Rights		Current Schedules	
		NT TSR	270	NT e-Tag
	PTP TSR	80	PTP e-Tag	80
330	Total	350	Total	380

Status Quo - Curtail on Transmission Rights							
Step 1 TSR Limits	Step 2 TSR Limit based curtailment		Step 3 TSR Limit Over- curtailment return	Step 4 E-Tag Curtailment	Totals		
TSR Limit	E-Tag amended Value	Curtailment	Return MW	Remaining Curtailment	Resulting Flow	Total Curtailment	Impact %
270	270	-30	NA	-15	255	-45	92%
80	80	0	NA	-4	76	-4	8%
350	350	-30		-20	330	-50	

E-Tag Based Curtailment post OATI Amendment			
Step 1 - E-Tag Curtailment	Totals		
Pro Rata Curtailment	Resulting Flow	Total Curtailment	Impact %
-39	261	-39	79%
-11	69	-11	21%
-50	330	-50	

Review of Implicated Policies

Current Redispatch and Curtailment BP:

“...D4. BPA Transmission Services will curtail schedules pro-rata according to NERC Curtailment priority...”

Network Operating Agreement:

“... Parties must request and coordinate outages in accordance with the Tariff and the Transmission Provider’s Standards and Practices...”

Scheduling Transmission Service BP:

H.5 “Demand check validations will be performed on all e-Tags unless Customers meet one of the following criteria:

- a. Retain a FPT (7-F) or NT Memorandum of Agreement (MOA) (7-FN) contract with BPA that addresses special scheduling provisions for specific Firm Transmission Demand that is not explicitly represented by Open Access Same-Time Information System (OASIS) reservations and submit Firm e-Tags with the -ND suffix appended to the Reference field of the e-Tag's transmission allocation.

NT BP:

Redispatch and curtailment are not referenced.



Tariff Review

13.6 Curtailment of Firm Transmission Service:

“...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 basis, however, Non-Firm Point-To-Point Transmission Service shall be subordinate to Firm Transmission Service...”

33.4 Curtailments of Scheduled Deliveries:

“...the Parties shall Curtail such schedules in accordance with the Network Operating Agreement...”

Previous FERC guidance:

- In response to FERC’s Notice of Proposed Rulemaking for Order 890,
 - A regional TP submitted comments to FERC proposing that FERC allow pro rata “curtailments made prior to the energy scheduling and tagging deadline (e.g., 20 minutes before the operating hour) to be **based on reservation rather than schedule**.”
 - This proposal was rejected by FERC noting “pro-rating curtailments based on reservations would have the potential to impair reliability since the amount of capacity actually curtailed using this approach would **not address actual power flows** and, therefore, may be less than required to relieve the overloaded facility.”



Industry Scan

BPA staff coordinated with other OATI implementation SMEs within the region to understand how others have dealt with this nuance of OATI Curtailment Manager (CM)

- All other transmission providers queried have implemented the base configuration of OATI CM

BPA Staff also reviewed the similarities and differences in its positioning within the region

- BPA's implementation is unique and is unlikely to align with other TP's situations
- Implementation among some transmission providers of NITS on OASIS - Scheduling Rights is recognized to limit schedules up to their "rights"
 - BPA has prioritized implementation within the NITS on OASIS Phase II project
- BPA's number of NT customers with diverse needs and situations increases overall complexity
- Other complexities include TPs who differentiate processes for real time curtailments from planned curtailments

BPA staff determined that other assessment criteria may better serve to evaluate the alternatives

- Policy Review
- Tariff FERC guidance alignment
- Applied impacts of BPA's current practices
- Positioning for upcoming NITS Phase 2 implementation



Alternative Review

Status Quo: Curtail by TSR Limits & E-Tags

Alternative 1: Curtailed by schedules within OATI (E-Tag)

- Amend BPA current OATI CM calculation and reporting to align with a schedules-based curtailment calculation on 1:1 paths

Alternative 2: Curtailing based on current OATI logic while introducing logic to amend NT TSR Limits to match the sum of their schedules in real time

- Update NT TSR MW level to scheduled MW level in real time. This may be another implementation that has the same result as a change to the calculation to look at PTP TSR limits and NT Schedules

Alternative Review (Cont.)

Alternative 3: Transition to “one” internal (iCRS) curtailment tool for all paths

- Similar to flow-based paths, add 1:1 to iCRS (BPA’s internal curtailment tool) thus BPAT utilizing “one” curtailment tool. OATI CM is still needed to apply Conditional Firm priority to the E-tag

Alternative 4: Status Quo + (ICRS for congested 1:1 paths - Short Term Fix/ Scheduling Rights - Long Term Solution)

- Transition La Grande, RATS and WOG W>E lines to ICRS curtailment pending implementation of Scheduling Rights where the root cause of scheduling above TSR Limit may be systematically addressed

Summary of Recommendation

BPA Staff recommends implementation of **Alternative 1**:

“Amend BPA current OATI CM calculation and reporting to align with a schedules-based curtailment calculation on 1:1 paths.”

Pro:

- Ensures pro rata impact from curtailments on 1:1 paths
- Ensures alignment with BPA OATT
- Amendment to this calculation would align with the current BPA R&C BP
- Retains use of OATI tools, including integration with CCO and OASIS posting functionality

Con:

- Requires technical implementation.
 - The scope of this work is currently under investigation. It could range from simple configuration changes to requiring a Change Order to modify the curtailment tool functionality.
 - Testing required to develop PTP CFS curtailment priority assignment logic within a schedules only calculation environment



Next Steps

- BPA will pursue OATI CM amendment to address risk of unequal impact
- Curtailment Manager amendment options are under discussion with OATI
 - *Change in configuration vs change request to amend program*
- Other Identified Topics
 - *Implementation of Scheduling Rights and the NITS on OASIS Phase 2 recommendations*

Questions?

Please submit comments by 02/01/2023 to techforum@bpa.gov (CC: your Transmission Account Executive) – *please note “1:1 Path Curtailments” in the subject line*

