

November 21, 2019

Re: Requests for Comments on Curtailment Methodology for Dynamic Transfers

Powerex appreciates the opportunity to comment on the material discussed on the conference call from Nov 5th, 2019 and the Tech Forum notice provided on Nov 7th, 2019. Powerex supports BPA implementing curtailment procedures that respect the Open Access Transmission Tariff (OATT) curtailment priorities.

Powerex does not agree with the current implementation that has the potential to limit a dynamic schedule to the energy profile depicted on the e-Tag. Dynamic e-Tags are used to support interchange schedules that vary on short notice within the operating hour (such as 5-minute EIM dispatches). While the transmission customer may provide an *estimate* of the expected dynamic transfer using the energy profile on the e-Tag, the variable nature of dynamic schedules means that the actual intra-hour dynamic transfer may be higher or lower than the estimate at any particular moment. The current approach of relying on the energy profile can result in a dynamic schedule using firm transmission being substantially and adversely limited.

BPA should modify its curtailment methodology to evaluate dynamic schedules using the transmission allocation on the e-Tags in order to determine the amount that should be limited for reliability purposes. Similar to a Capacity e-Tag, the transmission allocated to a dynamic schedule generally reflects the maximum potential dynamic transfer that may occur within the hour. In addition, the business practice for Dynamic Transfer Operating and Scheduling Requirements should be updated to clarify that the transmission profile of dynamic and capacity schedules are used for curtailment purposes, and that OATT transmission priorities are respected.

Sincerely,

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