

NIPPC comments on 1:1 Path Curtailments
By e-mail to: techforum@bpa.gov

Thank you for the opportunity to submit comments on this proposed business practice.¹

NIPPC has concerns regarding the proposal to curtail schedules by E-tag without reference to customers' underlying transmission service reservations. While the ease and speed with which operators can issue curtailments is an important factor, BPA should also consider the implications for customers who submit schedules (E-tags) at or below a temporary reliability scheduling limit on a path. Under the proposal, customers who respect a reliability scheduling limit and submit an E-tag for a MW quantity below the full value of their transmission service reservation will bear a larger share of the curtailment than a customer who submits an E-tag for its full reservation rights despite notice of a reliability scheduling limit. When operators act to curtail schedules pro rata, the customer who voluntarily scheduled service within the reliability scheduling limit is harmed vis a vis the customer who scheduled its full rights. NIPPC suggests that BPA should consider these implications in establishing its business practices.

If BPA were to proceed with adopting the preferred alternative, the likely result would be that all customers would seek to maximize their post-curtailment service by ignoring the reliability scheduling limit and instead scheduling the full quantity of their scheduling rights. Is this the behavior BPA seeks to encourage? If not, BPA should reconsider its preferred alternative.

NIPPC suggests that the status quo – which takes into account both the MW quantity of a customer's transmission service reservation as well as the scheduled E-tags – is the correct methodology. In the event curtailments are required on a 1:1 path, customers (including NT customers) who have submitted schedules in excess of the reliability scheduling limit are curtailed first down to their pro rata share of that limit. Only then would all schedules be curtailed pro rata.

¹ The example cited in the chart on page 5 of the 1/18/23 presentation appears to show that NT customers have submitted schedules in excess of their transmission service reservation rights. Is this a typographical error in the example? Why would that customer not be curtailed to its transmission service reservation quantity and charged unauthorized increase penalties? Or is this a responsibility of BPA's transmission planning function and represent a failure to plan and ensure adequate service for Network Service customers consistent with their 10 year load and resource forecasts?