

Redispatch and Curtailment BP

- 1:1 Path Curtailments –

Alternative Pros and Cons

01/31/2023



Status Quo

Status Quo: Curtail by TSR Limits & E-Tags

Pro:

- Current system process (No system changes required)

Con:

- Maintains risk of uneven impact of curtailment to NT customers
- Rights based curtailment calculation in step one may not align with Tariff
 - “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.” BPA OATT 10-01-2021 13.6
 - “... Transmission Provider determines that it is necessary to curtail scheduled deliveries, the Parties shall curtail such **schedules** in accordance with the Network Operating Agreement...” OATT 10-01-2021 33.4
- Risk of Customer Dissatisfaction
- May not align with previous FERC Ruling/ Guidance pointing TP to use E-Tag (schedules) based curtailments
- Not consistent with current BPA Redispatch & Curtailment BP
- Contradicts previous messaging on implementation of TSR limits and how they will or won't be utilized
 - BPA previously advised customers that the TSR limitations would not impact NT service



Alternative 1

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
- Customer identified (1/18/2023 Customer meeting) impact to reliability limit utilization.



Alternative 2

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

Pro:

- Ensures pro rata impact from curtailments on 1:1 paths based on rights

Con:

- More complicated calculation
- May not fully alleviate risk of uneven impact
- May be inefficient as curtailments may be applied to transmission not scheduled at the time of need
 - If PTP is not fully scheduled
- May not align with previous FERC guidance
- Requires technical development and implementation of new internal systems



Alternative 3

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

Pro:

- iCRS curtails based on e-tag priority
- Treats NT and PTP the same for 1:1
- One tool that issues curtailments
- iCRS is a in house software that allows for better/quicker flexibility to make changes as BPA TS/TO deem is needed
- Allows BPA to add dynamic counter flow without manual intervention
- Allows for implementation over time limiting resource impact
 - Update La Grande and RATS 1:1 paths as these paths have NT flows while parking remaining 1:1 paths to be transitioned at a later date.

Con:

- Requires BPA Existing team resource allocations to add paths and test
- Changes TOR current process
- Disconnects BPA’s processes from OATI Curtailment manager tool and common regional industry toolset.



Alternative 4

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

Pro:

- Limits duplication of work (Changes to current curtailment logic before implementing NITS on OASIS phase 2 changes)
- Resolves potential risk area discussed in customers comments
- Migration to ICRS mitigates short term risk of TAG based OATI check impacting NT customers.
- Amendment to NT ATC impact “Scheduling Rights Module” implementation is expected to resolve root cause of risk.
- Right sized course of action
- Doesn't rely on BPA's customization approval or outside vendor

Con:

- Requires BPA Existing team resource allocations to add paths and test
- Training Required for second procedure for curtailments (Real Time Scheduling)
- Implementation of short term changes may not be utilized depending on Scheduling Rights timeline
- Short term fix mitigates risk on some 1:1 paths but does not eliminate the risk from the system.
 - Cons related to Status quo apply to other 1:1 paths



Next Steps:

- Pro and Con Detail posted 01/31/2023
- Customer Comment Period extended to 02/08/2023
- Follow up customer meeting to be scheduled after Staff review of customer comments and finalize recommendation