Idaho Power comments BPS for Recommendation 2015 WEQ Annual Plan Items 1.e / R14002:

Idaho Power would like to thank the BPS for their diligent work on this standard. We would like to provide the following question/comment. With regards to the following:

XXX-1.4.1 Each Transmission Service Provider shall limit the Interchange Schedule (both Firm and non-Firm) of the reservations on an ATC path into and out of Transmission Service Provider’s BA on an interface with another BA such that the net Interchange Schedule does not exceed the sum of the Facility Ratings of Tie Facilities (to which Transmission Service Provider has the right to use) with such other BA.

There does not appear to be a measurement time involved in determining the point of which the overschedule must be mitigated. For example, in the WECC, schedules come in 20 minutes before the scheduling interval and curtailments are made prior to the top of the hour or prior to the next 15 minute scheduling horizon if overscheduled on the path (for example, curtailments usually occur between xx:40 and xx:50 for schedules that start at the top of the hour). Adding some type of language regarding a measuring point would be helpful to comply. The way it reads today, it can be interpreted that the very next schedule that send the interface negative would be denied to avoid exceeding. However, if the next schedule submitted is a firm schedule that would interrupt any non-firm schedules, you would want to take that. I am not sure how you comply with this without some measurement point. Perhaps the following:

XXX-1.4.1 Each Transmission Service Provider shall limit the Interchange Schedule (both Firm and non-Firm) of the reservations on an ATC path into and out of Transmission Service Provider’s BA on an interface with another BA such that when implementing the real-time schedules the net Interchange Schedule does not exceed the sum of the Facility Ratings of Tie Facilities (to which Transmission Service Provider has the right to use) with such other BA.

Something like this might make it understandable that you can’t be overscheduled when you start ramping in your schedules for the next ramping horizon. It would give a measurement point in time, thus allowing the TSP to accept all schedules up to their specified OATT time (or regional approved time) and then issue curtailments before the next horizon that is overscheduled is ramped.

Thank you again for the opportunity to comment.

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