Transmission Curtailment Posting Enhancements

FERC Request (Order 890)

We agree with suggestions for the posting of additional curtailment information on OASIS and, therefore, require transmission providers, working through NAESB, to **develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments.** Transmission providers need not implement this new OASIS functionality and any related business practices until NAESB develops appropriate standards. These postings must include **all circumstances and events contributing to the need for a firm service curtailment, specific services and customers curtailed (including the transmission provider’s own retail loads), and the duration of the curtailment.** This information is in addition to the Commission’s existing requirements:

Do the NAESB standards have this provision currently?

Generally speaking the OASIS templates already provide the data elements to address FERC’s request. WEQ-002 2.4.3 ¶2 states ‘…The following OASIS Templates define the Data Elements in fixed number and sequence which must be provided for all data transfers to and from the OASIS Nodes. The definitions of the Data Elements are listed in Business Practice Standard WEQ-003. TSIPs must provide a more detailed supplemental definition of the list of Sellers, Posted Paths, POR, POD, capacity types, ancillary service types and OASIS Templates online, clarifying how the terms are being used (see Business Practice Standard WEQ 002-4.3.5.1, ***list***)… Additionally, the TP has the tools today via the OASIS templates to publish curtailment and interruption events using:

* ***‘security’*** to post reliability events that may impact scheduling capability without delay; and,
* ***‘schedule\_detail’*** where *the TC can query (WEQ 002.4.3)* information about transactions impacted by the event after-the-fact (e.g., 7 days later).

Transmission Collection and Posting of Curtailment Data – Solution Option 1: Use the existing OASIS ***‘security’*** template (e.g., use existing tools)

Transmission Providers use various forms of software to collect and post curtailment data.

Transmission Provider’s using generic curtailment data collection software can translate the necessary transmission curtailment data fields from the generic TP curtailment data collector to the OASIS ***‘security’*** template with enhancements needed for existing OASIS data elements including expanded query thereby providing a standardized/consistent approach to transmission curtailment data postings.

Example using the ***‘security’*** template:

 TC Query Generic Curtailment Data OASIS Security Template

Collection Data Elements

|  |  |  |
| --- | --- | --- |
|  | ScheduleDay | **\*\*\*** |
|  | HourEnding | **\*\*\*** |
|  | **\*** | INITIATING\_PARTY**\*** |
|  | CurtailmentID | RESPONSIBLE\_PARTY |
|  | CurtailmentStartTime | START\_TIME |
|  | CurtailmentStopTime | STOP\_TIME |
|  | Category | SECURITY\_TYPE**\*\*** |
|  | CurtailmentReason | ANNOTATION **\*\*\*** |
|  | FlowGateName | FACILITY\_NAME |
|  |  | EVENT\_ID**\*\*\*** |
|  | Category | PROVIDER\_ACTION**\*\*** |

Modifications to OASIS Data Element Definitions in the ***‘security’*** template:

START\_TIME and STOP\_TIME reflect the period of time encompassed by the particular security event posted. In cases where a security procedure is invoked and then progresses through various levels or stages, there shall be separate postings for each of those stages declared by RESPONSIBLE\_PARTY with START\_TIME and STOP\_TIME reflecting the period of time each specific level of the procedure was in effect. Recommend no change.

The RESPONSIBLE\_PARTY is the company code of the entity responsible for administering a transmission security procedure. Recommend no change.

INITIATING\_PARTY is a Company code for company responsible for initiating execution of a transmission security procedure. \*For local network the default should be set to the host TP.

SECURITY\_TYPE – An optional TP entry that identifies the type of information posted for the event; restricted values are:

* OUTAGE – for postings reflecting the state of critical transmission facilities
* LIMIT – for postings reflecting the implementation of security procedures to limit or reduce scheduled transactions.

**\*\***The SECURITY\_TYPE data field should be mandatory. In addition, add PROVIDER\_ACTION to the ‘security’ template as a mandatory entry for the TP to complete.

FACILITY\_NAME is the name of facility, such as name of Posted Path or name of the flowgate. Recommend no change.

**\*\*\***Recommend to create or modify the existing data elements to fit both Eastern and Western interconnections (IRO-6 is specific to the Regional Reliability areas and the Western Interconnection does not use this field today). Require as mandatory for the TP to fill in and post.

After-the-Fact

After-the-Fact market data (e.g., transaction data or e-tags) should remain at the 7-day posting to address market sensitivities. Because the ***‘security’*** template does not include transaction data it can continue to be posted without delay as is done today. The OASIS ***‘schedule\_detail’*** template data is automatically posted after a 7-day period and includes the ‘security’ template data (e.g., SECURITY\_REF) as well as the transactions (e.g., e-tags) impacted by the curtailment. However, the event cannot be queried to return the associated impacted transaction(s) (i.e., the transaction information is only available through query of the START\_TIME and/or STOP\_TIME data elements). An after-the-fact query of and ***‘event’*** template should return all of the impacted e-tags.

Lastly, native load (e.g., retail load) transactions are not tagged but can be market sensitive and should not be translated to the ***‘security’*** template but should be included in a response to a query of the EVENT\_ID on an after-the-fact basis.

Solution Option #2: Create a new ***‘event’*** template that would associate the transactions with the event (e.g., create new OASIS tool).

Should the standards be expanded to address BA and/or Reliability Coordinator curtailment event posting requirements?

FERC’s direction is to NAESB is to address the Transmission Provider (e.g., not the Reliability Coordinator or Balancing Authority) for the immediate assignment. Careful review the NERC IRO-06 standards is needed to recognize to the variance of functional entities responsibilities by region (e.g., Eastern, Western, ERCOT, etc…) for curtailment and interruption events and, if OASIS postings are deemed necessary, this activity should be completed under a different NAESB assignment.

Consideration of Solution Option #1 and #2 - PROS and CONS

Solution Option #1 - Using Existing Templates with Enhancements

Pros

* May have a quicker start up
* Currently existing data elements could be utilized
* Modification of existing template structures may be easier and less costly to implement than starting from scratch

Cons

* Would have to redefine certain data elements to make them usable between eastern and western interconnection
* Security template not really designed to handle the transaction data along with the overall event data
* If the curtailment is issued from a 3rd party system there might not be a unique identifier associated with all affected transactions
* Retrieval of event data and all the subsequent actions performed may be difficult
* Significant modifications may be required to handle Native Load transactions

Solution Option #2 - Create New Event Template

Pros

* Can be designed to handle both eTag transactions and Native Load transactions
* Can be designed to better fit both eastern and western interconnection congestion management processes
* Not bound by existing template structures
* Could be designed to be automated to some extent for exporting data to the Event Template
* Posting could be automated

Cons

* Greater initial effort up front to design the templates, data elements, and processes
* Development cost is likely to be higher
* Overall time from design to implementation may take longer