

COMMITTED SCHEDULING ISSUES

Background

The fundamental concept of VERBS Committed Scheduling Service is that participating entities agree to a specific approach to scheduling, which is demonstrated to be consistent with the performance of 30/30 or 30/60 persistence scheduling, and that BPA monitors scheduling accuracy performance on an ongoing basis to ensure that the expected level of scheduling accuracy actually occurs.

EDPR Proposals

1. BPA staff agrees and will recommend to management that VERBS Committed Scheduling (VERBS CS) customers that deliver their energy outside of BPA's BA may modify their POD, so long as the POD remains outside of BPA's BA. Monitoring of POD applies to Committed 30/30 scheduling (and Committed 30/15 if offered). PODs for 30/60 scheduling will not be monitored.
2. BPA staff agrees in concept with the EDPR proposal to allow VERBS CS customers sinking energy inside the BPA BA to designate a portfolio of resources instead of a single CS Balancing Resource to be used for monitoring that other resources respond to changes made on half-hour intervals. Wind plant schedules will continue to be monitored according to schedule accuracy metrics defined in the Committed Scheduling business practice. Systems development would be required to implement this portfolio concept in a way that ensures that BPA is able to ascertain that the schedule changes for the portfolio of balancing resources effectively offsets the intra-hour schedule changes of the wind resource. BPA will need to clarify how the portfolio would be established and measured before agreeing that this concept could be implemented. Customers would be required to define their resource portfolio ahead of time to enable performance tracking.
3. BPA has considered EDPR's suggestions with respect to defining performance criteria related to the accuracy of participants' balancing resource portfolio for intra-hour schedule changes. BPA has not currently established specific quantities of capacity required to ensure that the balancing resource (or portfolio) is able to respond. Instead we have planned to simply monitor that it did respond effectively so that generation imbalance is not converted to energy imbalance.
4. EDPR proposes that BPA should not require advance notice to modify the resource portfolio. BPA staff believes and will recommend to management that any balancing resources to be included in the portfolio would need to be identified in advance, and a combined signal would need to be established for monitoring purposes. With respect to specific elements EDPR proposes to include in the portfolio, such as changes in load, demand response, dispatchable resources, intra-hour purchase and sales, changes to deliveries outside the BPA BA, etc., BPA believes the core issue is finding ways to ensure monitoring is feasible and automatable. BPA does not have staff resources to implement extensive manual processes for tracking and changing portfolios on the fly. BPA believes that allowing changes in an already existing portfolio with 60 days notice is feasible for

implementation. The time frame for initial establishment of a portfolio resource is uncertain.

5. BPA staff will recommend modifying the Committed Scheduling Business Practice to clarify that both the impacted and subsequent scheduling intervals associated with transmission curtailments are excluded from the Committed Scheduling metrics. Once plant specific potential generation is available in our systems, we would anticipate using that value instead of a persistence value for the scheduling metric for hours subsequent to a transmission or DSO216 curtailment.

SCE Proposals

SCE proposes a significant number of “strikes” or metric failures to be allowed for CS participants. SCE’s proposal to allow a set number of “strikes” per month for 30/30 and 30/60 scheduling raises concerns that the capacity savings associated with this service election would not be achieved. SCE is proposing that these strikes be specifically defined as above and beyond any contingency events or curtailment events, so they would presumably be directly associated with times the scheduler does not submit a correct schedule. BPA’s process for evaluating metrics allows parties to respond to a finding of failure to meet the metric by explaining that uncontrollable forces such as equipment failures may have caused the metric to be missed, and BPA is prepared to take such events into account in evaluating performance under CS. However, the concept of Committed Scheduling is that parties direct their schedulers to ensure schedules are actually submitted according to the scheduling practice they commit to. BPA has found that for current intra-hour scheduling participants, automation is the best approach. BPA staff recommend against allowing a predefined number of strikes for failure to perform outside of contingency events.

SCE suggested elimination of scheduling submittal requirements. Given that the fundamental premise of the service is that parties commit to a specific scheduling practice, BPA is unclear on what issues SCE is attempting to address with this proposal, but staff believe that submitting adjusted schedules for each scheduling interval is a critical element of this service. We believe it would be difficult or impossible to meet the metrics and not routinely adjust schedules each half hour, for 30/30 CS, or hourly, for 30/60 CS. However, if there is no change in the persistence value or forecast being used, from one interval to the next, the schedule does not need to be changed.

SCE proposes that BPA not require participants to demonstrate the ability to meet the metrics before being enrolled as participants and receiving the discount. BPA’s experience has been that in the first few weeks of 30/30 scheduling, participants go through a fine tuning of systems and procedures. During that time, staff believes it is an important risk mitigation measure to continue to carry the capacity at the higher rate for the two weeks of testing, and therefore would recommend against offering the discount without testing.

SCE proposes that in addition to the significant number of “strikes”, entities could fail to meet accuracy metrics for up to four months before being required to shift to the next level of service. BPA staff recommends against this proposal.

BPA is proposing to retain the current persistent deviation penalty exemption for scheduling intervals that meet 30MP accuracy, as SCE suggests.

Other issues

BPA would like to better understand how the CS service, if extended to CS 30/15, would interact with the proposed CAISO 15 minute scheduling practices.

BPA has not yet reached a decision on allowing a mid-rate period election of service options.