

# General Updates and BPA Response to Customer Comments submitted March 7, 2014

CAISO EIM Implementation Stakeholder Meeting  
April 15, 2014



# Comments on Data Exchange

- From Powerex, Seattle City Light, Portland General:
  - BPA should establish confidentiality and use agreement on data exchange between BPA/CAISO/PAC [Powerex]
  - This is so that data would not be accessed by other market participants or be used by CAISO/PAC, without supplier consent, toward any purpose or initiatives other than efficient and reliable operation of the EIM (i.e. CAISO's FNME) [Powerex, SCL]
  - Data being provided to the EIM market operator, such as flowgate operations, must be made available to other EIM efforts and BA operations [PGE]

# BPA Response

- BPA appreciates comments from Powerex, SCL, PGE
- The BPA data to be exchanged directly with CAISO and indirectly through PEAK RC are necessary for the reliable operation of the EIM
- Operational Reliability Data that CAISO receives from BPA are protected under NERC's Confidentiality Agreement for Electric System Operation Reliability Data
- Data acquired from PEAK RC are regulated under the Universal Data Sharing Agreement (UDSA)
- Both agreements prohibit data exchanged from being used toward market/merchant functions or outside of approved purposes

# BPA Response Continued

## Data exchange between BPA, CAISO and PEAK for EIM Operation

- Bonneville to CAISO
  - Upper/Lower 5-minute delta flow limits on network flowgates (VTL)
  - Curtailment Relief Obligation
  
- CAISO to Bonneville
  - 15-minute market flows, schedules, forecasts
  - 5-minute market flows, schedules, forecasts
  - CAISO, PACW, and PACE 15 and 5-minute load forecasts and adjusted net-scheduled interchange
  
- PEAK to CAISO (Covered by Universal Data Sharing Agreement)
  - Northwest network model
  - Real-time flows and SOLs
  - Northwest (including BPA) real-time system data (line flows, breaker status, voltage, etc.)
  - Scheduled outages

# BPA Response Continued

- Some real-time data sets will be exchanged, however, no cost information is being provided
- CAISO will obtain from WECC Bonneville system topology information necessary to model the system in the Northwest in the FNME
  - The FNME is a separate and distinct effort from the operation of EIM
  - BPA and other regional entities are actively monitoring and participating in CAISO's process to make further changes to its operations and market
- BPA's view is that it is in the region's best interest to support data sharing practices that enhances regional reliability and transparency
- BPA is willing to facilitating similar data-sharing arrangements for other EIM efforts, other participants in the CAISO EIM, and individual BAs
  - Not all data may be applicable – case by case basis

# Comments on Variable Transfer Limits

- Southern Cal Edison Commented (“SCE”):
  - They continue to have concerns over the implementation of 5-minute upper/lower limits on the network for the PAC-CAISO EIM;
  - The limits will have a binding effect on the market and are unprecedented;
  - DTC is already managed on the COI through studied limits;
  - They have concerns about use of historical data for calculation of limits;
  - They respectfully request that BPA not implement 5-minute upper/lower limits.

# BPA Response

- BPA appreciates SCE's Comments;
- COI DTC scheduling limits and 5-minute upper/lower limits resolve different DTC issues;
- BPA believes the need for the limits were well established in previous customer meetings;
  - Studied Network DTC limits provide certainty that dynamic transfer limits are available for generator to follow a variable signal (such as a wind project or load)
  - The 5-minute upper/lower limits allow flexibility to accommodate EIM market flows from multiple generators that cannot be studied under the DTC methodology;

# BPA Response Continued

- BPA believes that use of historical data will provide rational limits, and BPA has plans to explore different methods of calculating the limits, as discussed in our stakeholder meetings;
- BPA also intends to implement 15-minute scheduling without any general ramp limits and thus, at this time does not believe it would be appropriate to design such a limit for the CAISO EIM. Further, such a limit may have a greater impact in terms of limiting of flexibility;
- BPA also plans to have the upper/lower limits sufficiently designed so that they can be tested in the full market simulation starting July 8, 2014;
- BPA plans to proceed with upper/lower limit implementation.

# Other Comments

- Review of DTC policies and studies
  - BPA believes that general discussion about DTC should be treated outside of the CAISO EIM Implementation stakeholder process;
  - BPA intends to discuss its approach to DTC further in the May 6 Customer Forum.

# BPA Participation in Customer Processes

- BPA has continued to participate in the CAISO and PAC customer and FERC process
- CAISO
  - BPA submitted multiple customer comments in CAISO's customer processes for the EIM
  - BPA's filings in the CAISO tariff docket are available at [FERC.gov](https://www.ferc.gov)

# BPA Participation in Customer Processes (Cont'd.)

## ■ PAC

- BPA has also participated in PAC's stakeholder process
- As discussed previously in BPA's materials and in the MOU, BPA has transfer load in PAC's balancing authorities. This has been the basis for much of BPA's participation in PAC's process
- BPA is currently developing a response in the FERC docket for PAC's recent tariff filing
- BPA continues to participate in the PAC's Business Practice development process; PAC posted portions of its draft EIM Business Practice on 4/4