



# Export and Load Scheduling

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# General Principle of Practice Regarding Firm Exports

- Two distinct scenarios on why a BAA/TSP may initiate a curtailment:
  - 1) Insufficient Supply
  - 2) Insufficient Transmission
- Energy priority (e.g., Firm Energy) is **separate** from transmission priority



# General Principle of Practice Regarding Firm Exports

- A general principle with respect to historic inter-BA practice is that one BA does not propagate its supply deficiency to another BA by cutting firm energy exports:
  - Export transactions (Off-System Sales) by the transmission provider's merchant arm are only done based on calculated surplus energy
  - Third-party exports are not interruptible for supply deficiencies
    - As such, firm exports are not cut by the native BA transmission provider, even to the possible detriment of native load
  - Abandoning this concept is a slippery slope and jeopardizes inter-BA comity and interconnected reliability



## OATT Rules of Load Service

- All transmission capacity is allocated under the OATT rules of open access.
- Under OATT, LSEs in BA must designate network resources to use firm network service for load service.
- If resource is not designated, LSE must request and be granted point-to-point transmission or secondary network transmission (non-firm).



# Sales of Designated Resources

- Resources designated as network resources **MUST** be undesignated prior to a firm sale to a third party.
  - This is the indication to the TSP that the transmission is not needed for load service by that network customer.
  - Point-to Point transmission is procured under the OATT for the sale separate from network transmission for the sale



# Idaho Power Load Service

- All load service is backed by physical assets.
  - Either owned or contracted generation or market purchases.
  - Market purchases are e-tagged.
- Energy Priority is NOT tied to transmission priority.
- The transmission provider does not curtail transmission transactions based on energy needs of a BA.



## Sales from Idaho Power's BA –

### IPC Owned Resources

- IRP process determines RA obligations
- Internal Risk Management committee reviews up to 18 months out to determine resources needed for load and reserve obligations.
- Day ahead group determines what physical resources are available to serve load and reserve obligations and ensures there are enough physical resource to meet the obligations.
- If surplus resources are identified, resources are undesignated and offered for sale by the merchant to the bi-lateral market.



## Sales from Idaho Power's BA – IPC Owned Resources

- Once that sale is made on a FIRM basis, it is now viewed as an obligation to serve along with load.
- Idaho Power does NOT cut these firm energy sales in favor of its load.
  - Reputation Risk
  - Pushing reliability issue onto other entities which can create a cascading effect.
- The key to this working is that we ensure the sales are ONLY from identified physical surplus supply to avoid the issue.





## Sales from Idaho Power's BA – IPC Owned Resources

- There is the option to sell non-firm energy from the IPC resource.
- This occurs if we think we may have surplus but are not sure. This non-firm energy can be recalled for any reason but is sold as non-firm and the purchaser understands what they are buying.



## Third Party Generation in IPC BA

- If a third-party generator located in IPC's BA is not contracted to sale the generation output to Idaho Power, we CANNOT curtail the export schedule if the BA is energy deficient.
- If a third-party generator schedules an export that is not supported by its resource output, that customer is subject to curtailment
  - Export curtailment/load shedding is pursuant to their network operating agreement
  - Exception: real-time unit outages are typically covered by contingency reserves for first hour



# Resource Insufficiency vs. Transmission Curtailment

- Firm transmission must be procured pursuant to a competitive open access process
- Transmission Curtailment is a reduction in firm or non-firm **transmission** service in response to a transfer capability shortage as a result of system reliability conditions
  - Non-firm schedules cut first
  - If transmission de-rate makes it impossible to accommodate all firm schedules, pro rata reduction
- TSPs **do not** curtail transmission service of its customers to address supply shortfalls in the BAA