# Response to Comments – Redispatch and Curtailment Procedures

### **BPA Transmission Business Practice**

Version 14
Posted 6/28/2024

## Response to Comments – Redispatch and Curtailment Procedures

#### Version 14

This document contains comments and BPA responses regarding Version 14 of the Redispatch and Curtailment Procedures Business Practice posted for comment from May 3, 2024, through June 11, 2024.

This is Bonneville's final agency action regarding this version of the business practice.

For more information on business practices out for comment, visit the BPA <u>Proposed Business</u> Practices webpage.

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#### Comments on BPA Redispatch and Curtailment v14

Seattle City Light (City Light) appreciates BPA's efforts to actively engage on business practice changes and be responsive to customers regarding concerns. City Light would like to offer the following comments for BPA's consideration regarding the BPA Redispatch and Curtailment v14 business practice.

#### Reservation Based Approach to Curtailment

City Light supports BPA following industry standard and basing curtailments on reservations. City Light encourages BPA to adopt this method for all BPA Paths. This would be equitable treatment of customers, following industry standard, and be the least expensive to maintain in the long term.

City Light thanks BPA for consideration of these comments.

#### **BPA Response**

Bonneville would like to clarify that the curtailment process for managed 1:1 paths described in Section D.4 of the Redispatch and Curtailment Procedures Business Practice is an industry best practice for those using OATI's curtailment tool rather than an industry standard.

Bonneville chooses to continue to align the management of flow-based paths with FERC guidance to accomplish pro-rata curtailment of schedules according to curtailment priority – rather than being based on reservations.