

DOCKETED

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IEPR-21-01 Understanding Balancing Authority relationships

Additional submitted attachment is included below.

IEPR-21-01 Understanding Balancing Authority relationships

The U.S. Energy Information Administration maintains a database of energy interchanges (exports and imports) between Balancing Authorities (BAs).

This data can be used to produce hour by hour charts of interchanges and degrees of separation in the entire U.S. power grid. In charts below, California Independent System Operator (CISO) imports 2,300 MWh from Los Angeles Department of Water and Power (LDWP) and 2,000 MWh from Bonneville Power Administration (BPAT).

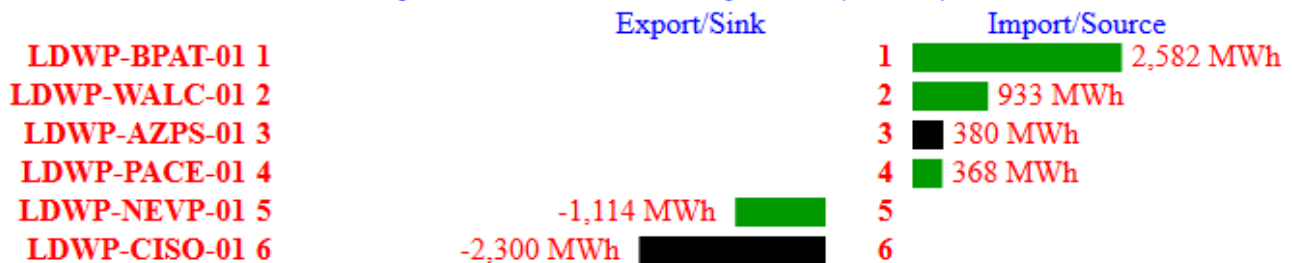
Saturday, 02/06/2021, Time of Day: 18:00 (UTC -8)



<https://wwmpd.com/e-iq/eba/ic-ciso/20210206.html>

At the same time, shown below, LDWP imports 2,582 MWh from BPAT and exports to CISO 2,300 MWh as shown above.

Saturday, 02/06/2021, Time of Day: 18:00 (UTC -8)



<https://wwmpd.com/e-iq/eba/ic-ldwp/20210206.html>

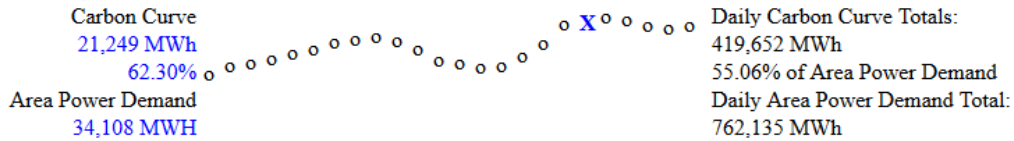
Considering both charts, is CISO actually importing from 4,300 MWh BPAT with 2,300 MWh wheeled through LDWP?

What happens if another BA such as Portland General Electric Company (PGE) requires and has contracts for additional 1,000 MWh from BPAT at time same time due to a extreme weather change and BPAT is at maximum output?

BPAT-PGE-02 41 -2,007 MWh 41

Perhaps by knowing that Southwest Power Pool (SWPP) has 1,000 MWh of uncommitted Natural Gas Power, that could be wheeled through Public Service Company of New Mexico (PNM) to Arizona Public Service Company (AZPS) and on to CISO, the power requirement could be met.

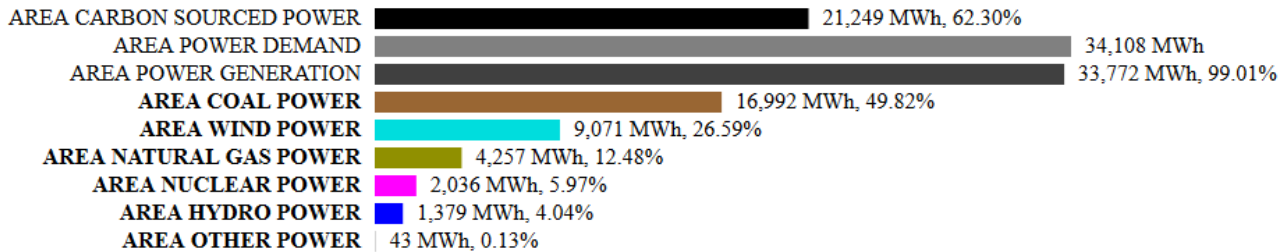
SWPP, Saturday, 02/06/2021, Southwest Power Pool



Time of Day: 18:00 (UTC -8)

Balancing Authority Area Hourly Fossil Fuel Sourced Power MWh & Percentage of Area Power Demand shown in details

play fast forward step back **step forward!** same time as now hide details



This would require power generation and transmission line capacity knowledge at the fingertips of the decision makers setting energy policy.

Data is out there, but no one system contains all data one place, in a normalized database. It is not for lack of effort, it is because entities that spend time managing QFER, RPS Online, WREGIS, and CAISO each make their on lists of power plants, with their own identification numbers and names, spending more time than is required to build and maintain a single accurate database.

I believe lack of data continuity was demonstrated mid August of 2020 with rolling power cuts in California Independent System Operator Balancing Authority area.

Pursuant to Public Resources Code - PRC 25302. (b), The integrated energy policy report shall include an assessment and forecast of system reliability and the need for resource additions, efficiency, and conservation that considers all aspects of energy industries and markets that are essential for the state economy, general welfare, public health and safety, energy diversity, and protection of the environment. This assessment shall be based on the determinations made pursuant to this chapter.

The resource planning system that would enforce the discipline in data management has existed for many years. Creating analog models that use data such as California Energy Demand (CED) do little to help in real-time, such as finding power sources when the unexpected happens.

The Energy Commission falls far short pursuant to PRC 25302(b).

I challenge the Energy Commission to produce a standardized and normalized database, with standardized identification numbers, names, and product structures.

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