



December 14, 2022

Bonneville Power Administration

PNGC is submitting the following comments regarding BPA's presentation on augmentation from December 1, 2022.

PNGC appreciates BPA staff's work and analyses in providing some back of the envelope indications of what potential system augmentation would look like in future rate constructs. PNGC does think the analysis included some significant assumptions that were very conservative in nature and produced results on the high side for VER resource integration. Of particular note, the 1:1 capacity acquisition assumption for every MW of energy added may well overstate the true cost impact since there is capacity in the federal system that could be leveraged for at least part of that resource integration.

PNGC supports and would highly encourage additional analysis that looks at the entire FCRPS system and how the existing system could be leveraged for the integration of augmentation resources. PNGC also fully recognizes there are limits to the existing FCRPS system, and there is not unlimited ability to integrate VER resources. However, we believe there is good work to be done in order to determine how much VER resources can be paired with the existing FCRPS system within some risk bounds. We recognize that BPA staff time is limited and suggest that perhaps a 3rd party could be employed to complete work if time is a barrier.

Thank you,

PNGC