



April 27, 2022

Via Electronic Submission

John Hairston
Administrator and Chief Executive Officer
Bonneville Power Administration
911 NE 11th Avenue
Portland, OR 97232

Re: Resource Adequacy Engagement Workshop

Dear Administrator Hairston:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback on Bonneville Power Administration’s (“BPA” or “Agency”) April 13, 2022 Resource Adequacy Engagement Workshop, during which the Agency addressed BPA planning within the Western Resource Adequacy Program (“WRAP”) and explained planning scenarios related to preference rights.

Unspecified Resource Amounts and New Large Single Loads

During the April 13th workshop there was discussion between BPA and stakeholders regarding the responsibility of unspecified resource amounts and New Large Single Loads (“NLSLs”) as it relates to the Forward Showing period for the WRAP. AWEC understands that as part of the Forward Showing data submittal, BPA is responsible for having capacity available to serve the total retail load (“TRL”) of the Agency’s load following customers, less customers' specified resources, which includes specified resources serving NLSLs. However, the unspecified resources serving NLSLs at the Forward Showing period would not be reflected at the Forward Showing because the Regional Dialogue contract unspecified resource amounts do not have a known source until the pre-schedule period, months after the Forward Showing deadline. Regional Dialogue contracts enabled this helpful resource treatment for meeting loads before the WRAP information requirements were known.

As a consequence of this Regional Dialogue contract conflict with the WRAP Forward Showing requirements, and absent other options, the NLSLs served by unspecified resource amounts would create potential capacity costs assigned by BPA to the utility serving an NLSL once the WRAP is implemented, which would then get passed to the NLSL. BPA has suggested that this might become a service provided under the NR rate schedule, which is generally seen as a cost prohibitive solution for NLSLs. Alternative solutions have been requested by AWEC and other stakeholders but have yet to be provided.

AWEC is concerned that this issue, first identified in an August 2021 workshop, has not been revisited. AWEC's questions regarding NLSLs are outstanding, as noted in BPA's external public consideration tracker Excel sheet. As such, it remains unknown at this time who will be responsible for meeting the capacity requirement (financially and physically) of NLSLs served by unspecified resource amounts in the Regional Dialogue contracts. AWEC has substantial concerns given the unknowns regarding unspecified resource amounts and NLSLs, and the projected timeline of Fall 2022 for discussion of AWEC's questions. These concerns are heightened by the January 2022 Phase 3B decision deadline and binding Forward Showing on March 31, 2023.

In order to ensure that NLSL concerns are timely considered and addressed, AWEC suggests that BPA convene a working group to address these specific issues. The working group should be comprised of the Agency, utilities that serve NLSLs, AWEC and any organization that is similarly interested in resolving these issues, as well as individual end-use consumers affected by these issues or organizations, to the extent there is interest. Engagement in this way will allow collaboration and determination of solutions for unresolved NLSL issues with a report out on possible options to the broader stakeholder group. Coordination is necessary to ensure that any solution formulated in the small working group is a viable option for the loads being served and acceptable by the broader set of stakeholders.

Additional Planning Scenarios

The planning scenarios explained by BPA that "provide a sense of how the WRAP might change BPA's current process of marketing surplus power, but continue to preserve Preference Rights for public customers"¹ are highly informative and appreciated. AWEC requests that BPA provide similar examples for utilities serving both above rate period high water mark ("RHWM") loads and NLSLs with nonfederal, unspecified resource amounts so that a broad array of customers may understand the impacts of the WRAP on BPA's current processes.

/s/ Bill Gaines
Executive Director
Alliance of Western Energy Consumers

¹ Bonneville Power Administration, Resource Adequacy Engagement Workshop, at 43 (April 13, 2022).