



# Public Rate Design Methodology (PRDM)

## Workshop #6

Chapters 9 & 10, Risk Mitigation and Other Rate Design

Continuation of Chapter 5 Core Design Discussion

**Meeting 9 a.m. – 4 p.m.**

May 28, 2024

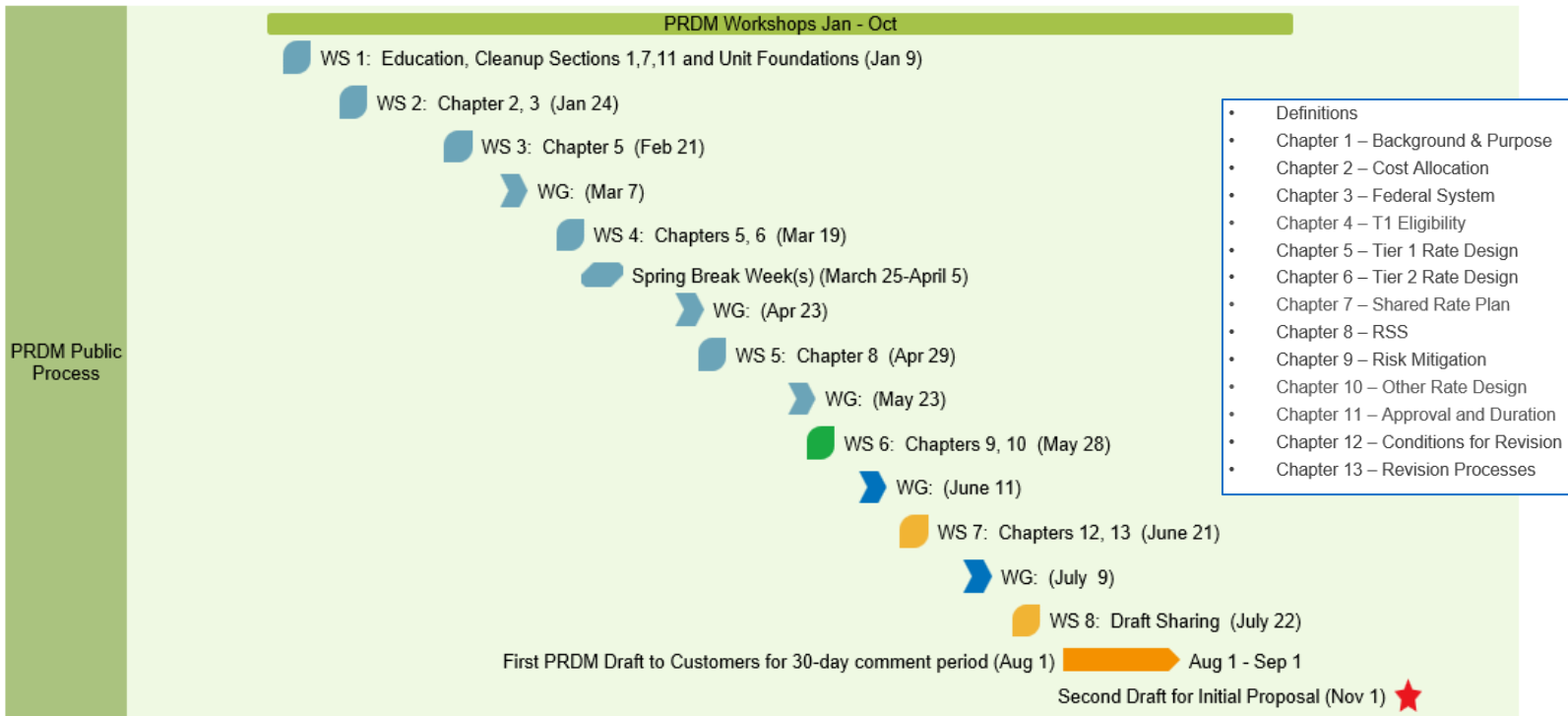


# Agenda

Time Start	Time End	Topic	Presenter(s)
9 a.m.	9:15	Welcome, Introduction, Agenda, and Housekeeping	Scott Reed
9:15	10:30	Workgroup report out and discussion	Scott Reed
10:30	10:40	<b>B R E A K</b>	
10:40	12:00	Chapter 9 Risk Mitigation	Mitch Green, Neal Gschwend, Daniel Fisher
12:00	1:00	<b>L U N C H B R E A K</b>	
1:00	2:30	Chapter 10, Other Rate Design (LDD, IRD)	Garth Beavon, Pontip Kruse, Mike Normandeau
2:30	2:40	<b>B R E A K</b>	
2:40	3:45	Core design elements and rates discussion	Daniel Fisher, Garth Beavon, Scott Reed, Peter Stiffler
3:45	4:00	Conclusion and next steps	Scott Reed

Note: times are approximate

# Timeline



# Housekeeping

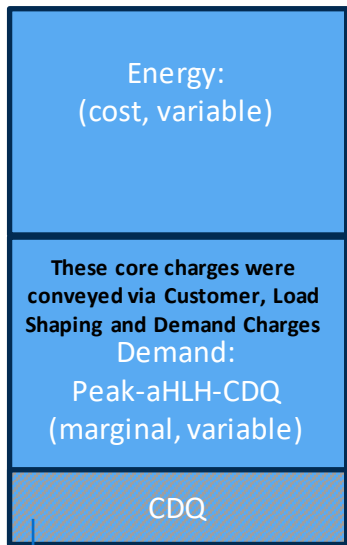
- Model and data inputs and updates – inputs have been scrubbed and updated with preliminary RIC:
  - Fixes: NSLSs, Load forecasts, LDD/IRD updates for some customers
  - Updates: RIC added, all load following added
- Coalescing around Alternative #1 – summarize customer feedback

# Workgroup Report Out

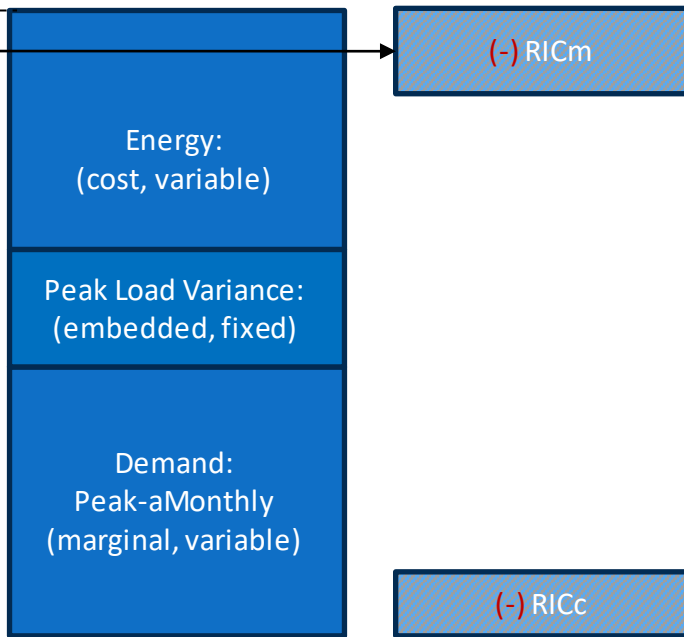
- **Summary**
  - Attendance
  - Topics
    - RDC Proposal
    - RICc – capacity credit
    - RICm – rate design change mitigation (TRM design to PRDM design)
    - Peak Load Variance Charge (PLVC)
    - RICc and JOE
- **Summarize discussion & feedback**

# Core designs before and after

## TRM Core Design Regional Dialogue (2012-2028)



## PRDM Core Design Provider of Choice (2029-2044)



\$ Credit: Per-customer net rate difference solely attributed to core design change from TRM to PRDM. 100% mitigation tapering to 0% for contract period.  
**(Iterates until all customers zero out)**

Net Rate Impact  
**A: view in BP 29**  
**B: view in BP 42**

\$ Credit: Per-customer effective rate at Marginal Demand Rate v. Embedded Demand Rate. Fixed amount for contract period (**all eligible**)

→ Fixed amount embedded within billing determinant



# RICc

RICc – the *capacity* RIC that balances the rate design to Bonneville’s embedded cost of capacity and is applicable for the term of the contract.

- This is a “capacity credit” that extends to customers the value of the embedded cost of capacity of the federal generation system. The RICc would be set by customer using BP-29 data and would remain static throughout the duration of the contract with the exception of certain annexations and formation of new publics.
- The RICc would be a \$/MWh credit for Bonneville’s embedded cost of capacity.
- The embedded cost of the federal system capacity (\$5.92 kW/mo) is lower than our current marginal demand rate (\$9.54 kW/mo). The RICc would be calculated as the difference in the forecast Tier 1 effective rate for a customer resulting from the use of a marginal demand rate rather than embedded demand rate.
- Each customer’s RICc will be calculated based on BP-29 forecast billing. The RICc somewhat captures value in the TRM’s Contract Demand Quantity (CDQ) as that sunsets, and helps mitigate the change of the billing determinant from aHLH to average monthly power use. It can be thought of as a proxy for “tiering capacity” via a monetized value.

# RICm

**RICm** – the *mitigation* RIC that tempers any remaining rate impact of the PRDM core charges relative to the TRM and is phased out over the term of the contract.

- Aimed at tempering rate changes that result from the TRM-to-PRDM core design change – and will not include the impact of other mitigation choices (IRD and LDD) nor any non-rate design impacts.
- RICm is a per-customer \$/MWh credit needed to mitigate the PRDM to TRM positive rate change to be zero in BP29. Our intent is that no customer will experience an immediate rate increase flowing from the change in the core design from TRM to PRDM.
- It would be calculated in combination with the RICc, so that the rate impact would be zero after the combination of both the RICm and RICc are applied.
- This amount would be phased out across the contract duration in six equal proportions. During the first rate period under POC, the RICm would completely mitigate the rate design change. During the final rate period, the RICm will have completely sunset, leaving a pure rate design.
- The cost of the RICc and the RICm would be charged to the Composite Cost Pool (similar to the IRD and the LDD, which reflects a shared allocation of the benefits and costs of power service). This would be a change from TRM, where the CDQ affected the Non-Slice Cost Pool only.



# Alternative RICc

## RICc *alternative* concept – embedded cost and a coincidence factor

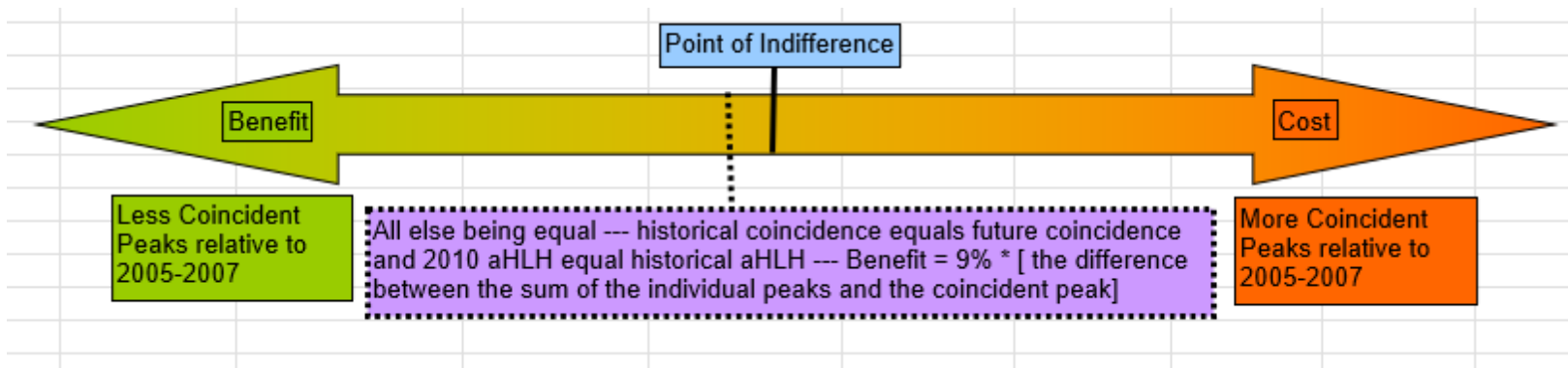
- This alternative RICc construct was created to try to be responsive to requests from some stakeholders that are concerned with tail and other-related risk sharing among non-Slice products. **Bonneville staff does not recommend this approach but is open to it.**
- We believe that if the future exploration of tail and other operational-related risks could lead to the creation of additional core charges or a material shift in risk sharing across non-slice products, then that future opener needs to be considered and traded for concessions in other core charges. We believe this is a “or” situation and not an “and” situation.
  - No load diversity factored in RICc and no potential future tail-event surcharge. **OR**
  - Diversity adjusted RICc and the potential of a different risk sharing across non-Slice products, such as a future tail-event surcharge applicable to only certain product choices.
- Alternative RICc would be designed to capture a diversity benefit not otherwise captured in a Customer System Peak (CSP) based billing determinant. This would effectively increase the size of a customers RICc for the term of the contract.
- Our approach could take the shape of using a coincidence factor ( $GSP/\sum CSP$ ) multiplied by the embedded cost to determine a diversity-adjusted embedded rate (e.g.,  $\$5.92 * 0.80 = \$4.73$  kW/mo.) that would be leveraged for the RICc calculation mentioned previously.

# RICc and Joint Operating Entity (JOE)

- JOE members' Contract Demand Quantity (CDQ)'s today are 'tuned down' to reflect a planned diversified demand signal. CDQ's are going away, and we need to consider how best to approach the RICc for JOE members.
- Proposal:
  - Each JOE member would be billed on their own CSP and the full RICc would be applied for each JOE's individual member consistent across all customers. These would remain intact and consistent for POC contract duration.
    - Unlike CDQs, no need to recalculate PNGC's RICc any time a customer joins or leaves PNGC.
    - Increases likelihood that Demand Side Management decided at the local level would provide 1:1 economic benefit to that utility.
    - Removes PNGC member risk of not being able to predict PNGC's peak (the same rationale for moving from GSP to CSP for all other utilities).
    - Removes diversity risk for PNGC members (see next slide) – as full RICc provided regardless of changes in PNGC member actual peak diversity.
    - Aligns with the greater PRDM package in that load diversity is either applied to all utilities or no utilities as a function of other rate design choices (see previous Alternative RICc slide).

# JOE's CDQ Math – Dusting Off 2008 Analysis

If nothing changed from the historical year to the 2010 year to the year that you bill, the JOE would see a slightly decreased billing determinant as a result of moving to a JOE coincident billing factor. This is simply due to the nature of the CDQ methodology and how it puts 9% of the historical peak on the margin. Putting 9% of a 100 MW load on the margin and then doing it again for another 100 MW load is effectively like putting a 200 MW load 9% on the margin. However, the JOEs peak load is only 190 MW and the methodology puts 9% of that peak on the margin. The **expected** benefit to the JOE then becomes 9% times the difference between the sum of the individual peaks (200 in this example) and the coincident peak (190 in this example). Benefit could be calculated as  $(190 - 200) * 9\% = -0.9$ . The actual benefit would be different and could either be a better or worse depending on the actual coincidence factor relative to the historical coincidence factor.



# Demand Rate & RICc

- Marginal prices in PRDM effectively do two things: allocate revenue-requirement across customers and send price signals to incent conservation and non-federal resource development. Both aims are held in balance, along with our interest in rate stability over time.
- RICc will be based on our planned, demand rate – and we have a choice to make there.
- Marginal rates apply to demand charges for LF and planned products. Here are our proposed approaches in PRDM:
  - Alternative 1: PRDM Fixed marginal price on par with today's pricing logic until capacity-based acquisition is made, with up only changes to that new marginal rate restricted by a governor.
  - Alternative 2: Marginal price to be determined each rate period, on par with today's pricing logic, with a governor restricting rate increases in PRDM. Workgroup seemed to be leaning in this direction with a fixed PRDM-defined seasonal shape.
  - Alternative 3: Upper-end marginal demand rate fixed for the term of the PRDM.
    - Ensures RICc is calibrated consistent with the PRDM's intent.
    - Sends a stronger and consistent price signal for capacity during the term of the PRDM.
    - Would make all capacity-based services more expensive – for example, RSS and ESS.

# Capacity and Pricing Structure Summary to Date

**PRDM Capacity Structure as of May 10 (in development)**

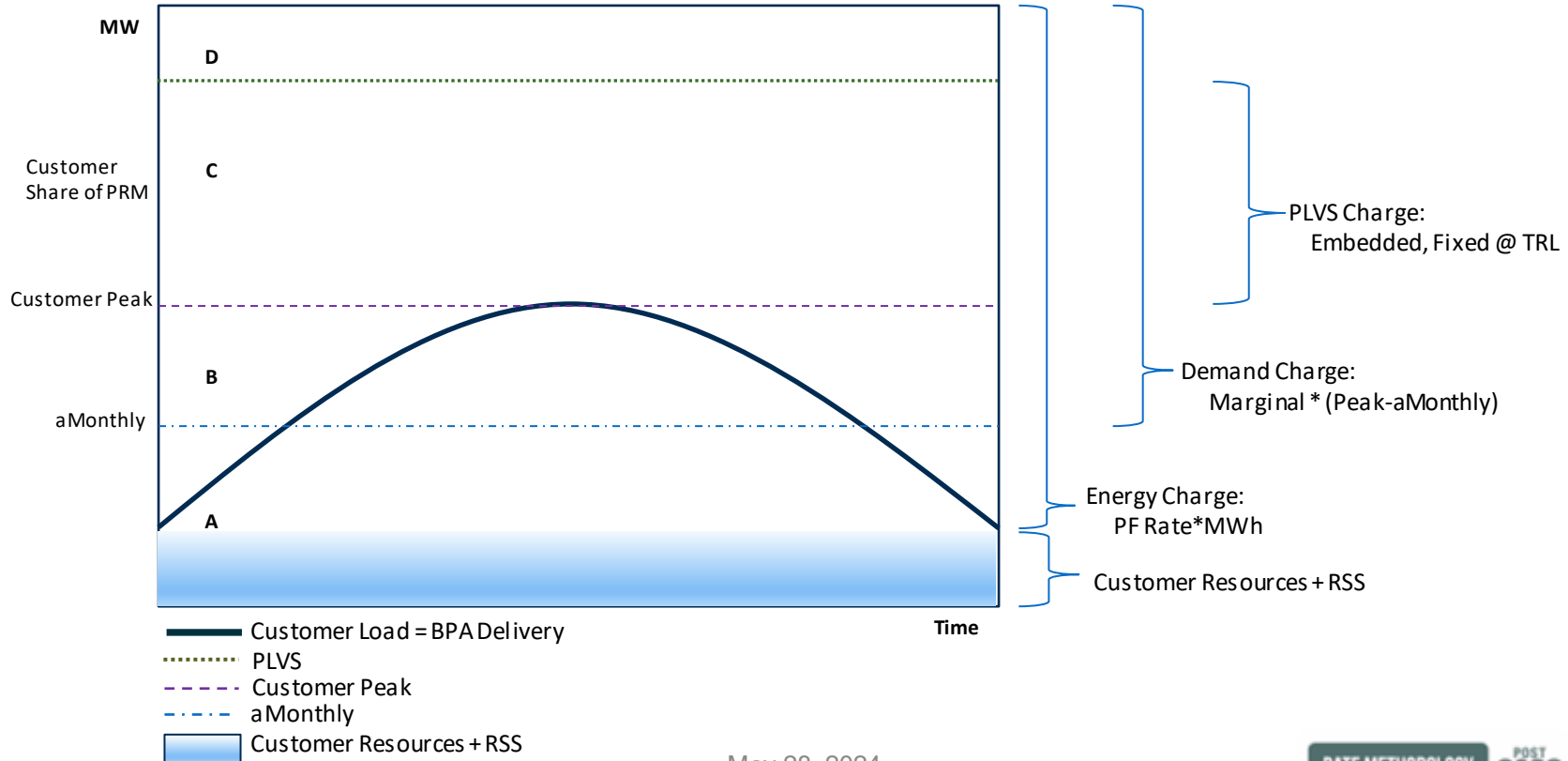
		A		B		C		D	
		Power (capacity & energy)		Shaping Capacity		Peak Capacity		Unplanned Capacity	
		LF	BWS	LF	BWS	LF	BWS	LF	BWS
<b>Element</b>	<i>Planned</i>					PLVS		n/a	
	<i>Actual</i>	Power + RICc		Actual Demand	Contract Demand	Demand + Energy	Energy	Demand + Energy	n/a
<b>Determinant</b>	<i>Planned</i>					Fixed PLVS		n/a	
	<i>Actual</i>	MWh		MW		MW & MWh	MWh	MW & MWh	n/a
<b>Rate</b>	<i>Planned</i>					Embedded		n/a	
	<i>Actual</i>	Tier 1 shaped to Mkt Forecast		Marginal		Marginal Capacity + Market Forecast Energy	Actual Market Energy	Marginal Capacity + Mkt Forecast Energy	n/a
<b>Access</b>		restricted to actual load	restricted to contract amount	*	*	restricted to actual load	restricted to defined amounts and events	restricted to actual load	n/a
<b>NF Resources</b>		contract amounts applies to load + RSS	unrestricted	*	*	*	*	*	*

**PRDM Pricing Structure as of May 10 (in development)**

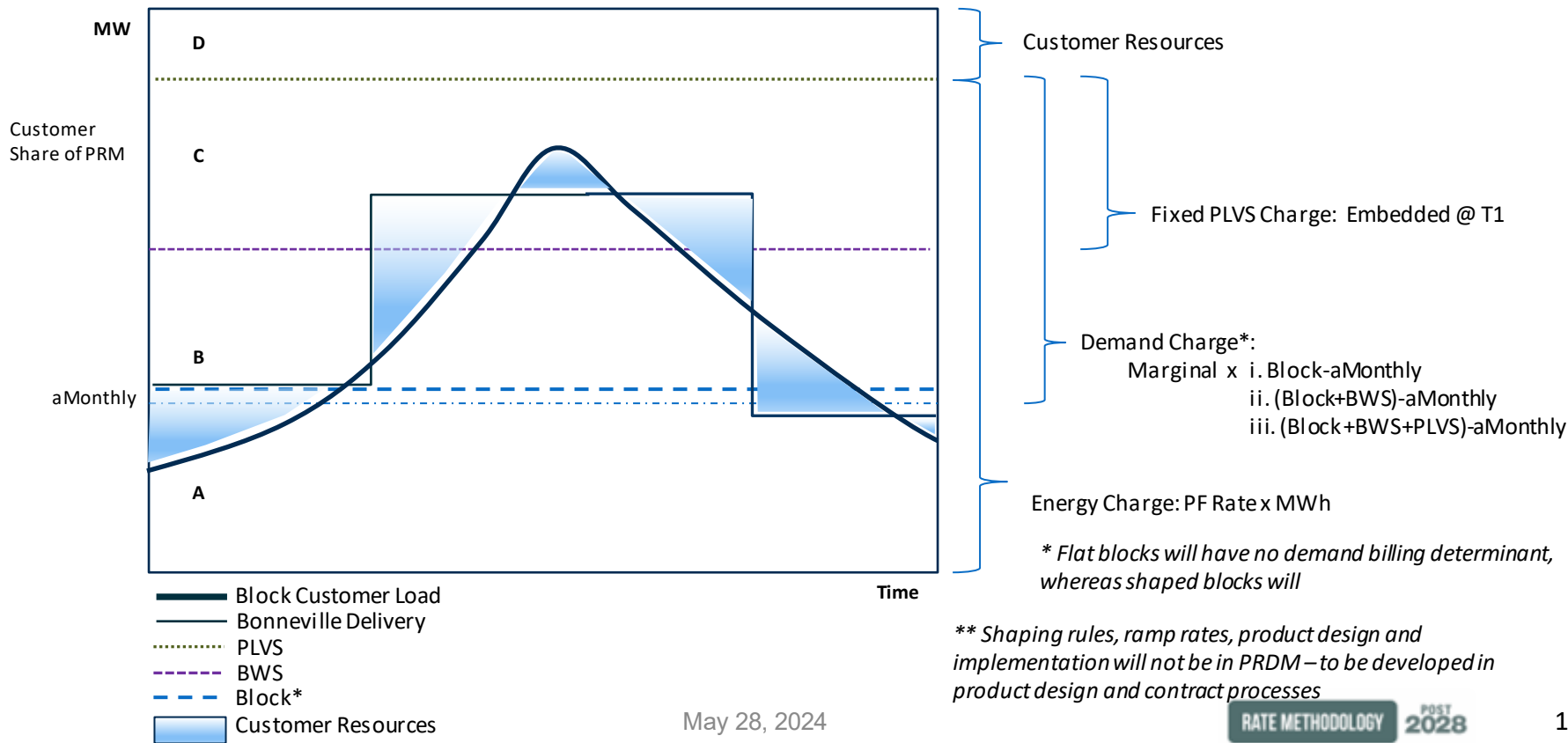
<b>Energy Demand</b>	Tier1 to CHWM, then T2 Marginal	n/a	T1/T2 Marginal	Market	T1/T2 Marginal	Market	T1/T2 Marginal	Market
<b>PLVC</b>	n/a		n/a		Embedded @ PRM * TRL	Embedded @ PRM * T1	n/a	
<b>RICc</b>	Fixed (contract duration) - effective rate delta between design w/marginal v. embedded rate							
<b>RICm</b>	100% to 0% across contract duration in 6 increments - iterative impact including RICc							



# Load Following Product Profile with Charges



# Block Variant Product Profile with Charges



**\*\* Shaping rules, ramp rates, product design and implementation will not be in PRDM – to be developed in product design and contract processes**



# Chapter 9, Risk Mitigation

Mitch Green, Neal Gschwend, Daniel Fisher



# Risk in the PRDM

- The risk section of the TRM is very light and leaves risk mitigation to each 7(i).
- We continue to believe this is the correct approach for the PRDM as locking down risk treatment would in and of itself create risk.
- As explained on the “alternative RICc” slide of this PowerPoint, the workgroup has been exploring potentially putting some additional non-Slice PF product guidance on risk in the PRDM. Bonneville staff would prefer to handle this broadly through the RICc alternatives, but we remain open to other proposals – particularly if they are “tweaks” or other principle-based additions to clarify our future intent.
- While the PRDM will not lock down how Bonneville will manage its future risk, we believe there is an opportunity to use the PRDM to build on and solidify past successes – specifically, trading more conservative base rates for certainty around how mid-rate period downward rate adjustment would operate.

# Risk Mitigation Principles in the TRM

Identify and design risk mitigation measures at each 7(i) process that address risks specific for each rate tier

Avoid risk mechanism spillover between cost pools and products

Provide for aggregate risk mitigation if necessary

Consistency with Financial Plan



# Potential Changes to Risk Mitigation Approach

While Bonneville intends to keep changes to its risk policies tied to its Financial Plan, here is a sample of our current thinking on approaches that we could consider including in PRDM (i.e., one of these):

- Reduced reliance on net secondary credit (i.e., <100% of expected NSR)
- Phase-out of Treasury Note for TPP support
- Additional PNRR

In exchange for certainty around how mid-rate period rate adjustments would function.

# Risk Mitigation Principles in PRDM

## Retained from TRM:

- Broad principles from TRM that seek to align risk with cost causation between rate tiers, products, and cost pools
- Flexibility to update risk framework (e.g., FRP & SCFP) with Financial Plan, as determined through each 7(i) Process

## Potential New Approach for PRDM:

- Add language that specifies additional risk mitigation paired with clarity on how the RDC process functions  
**Example:** *In response to [additional risk mitigation applicable to non-Slice PF Public rates]\*, any mid-rate-period downward rate adjustments applicable to the Tier 1 PF Public rates would be formulaic\*\*, automatic, and flow back to Bonneville's PF Public Tier 1 rates in the next fiscal year consistent with the PF Public Tier 1 rate's proportional load share of Bonneville's risk provisions.*

\*Specific language to follow decision on which variety of additional risk mitigation we can agree upon.

\*\*Such formula would consider Bonneville's leverage policy as captured in its Financial Plan.



# Chapter 10, Other Rate Design

Garth Beavon, Pontip Kruse, Mike Normandeau







# Irrigation Rate Discount (IRD) and Low Density Discount (LDD)





1. History
2. Regional Dialogue (RD) and Tier Rate Methodology (TRM)
3. Proposal for PRDM
4. PoC ROD





# Agriculture's Importance to PNW's Economy



Irrigation Method Reduces Water Needed for Potato Growth - SpudSmart

## History:

- 1942-1996, Irrigation Discount
- 1997-2001, Summer Seasonal Product
- 2002-2011, Irrigation Rate Mitigation Product
- 2012-2028, Irrigation Rate Discount
- Discount is not required by BPA statute

# IRD – RD/TRM

30 customers

BP-24 ~\$21  
million/year

IRD is about 1%  
(\$0.35/MWh) of PF  
revenue  
requirement



# IRD – RD/TRM

Load eligibility  
3-year average  
irrigation load

Eligible kWh  
amounts set for  
term of contract

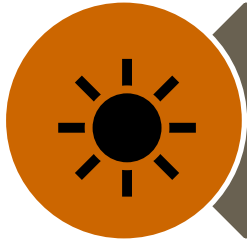
Discount rate  
(\$/MWh)  
determined each  
rate case

Discount applied  
to May-Sept  
power bills

End of season  
true-up

Cost-effective  
conservation

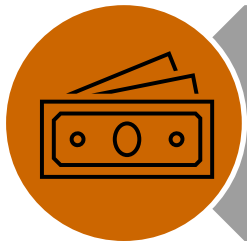
## Eligibility in RD/TRM – one of the following:



Summer Seasonal Product participant (FY 1997-2001)



Irrigation Rate Mitigation Product participant  
(FY 2007-2011)



75% of total retail load from BPA and May-Sept sales are 5% or higher. If sales are less than 5%, the 3-year average load is 7,500 MWh or more





# IRD - PoC/PRDM

Load eligibility  
5-year average of  
irrigation load

Eligible kWh  
amounts set for  
term of contract

Discount (\$/MWh)  
determined  
each rate case

Discount applied  
to May-Sept  
power bills

Overall program  
cost approximate  
to RD, TBD in 7(i)  
process

End of season  
true-up

Cost-effective  
conservation

## Eligibility in PoC/PRDM- one of the following:



Regional Dialogue IRMP (FY 2012-2028)



75% of total retail load served by BPA by October 1, 2028, and May-Sept sales are 5% or higher. If sales are less than 5%, the 5-year irrigation average load is 7,500 MWh or more



## Customers Lacking Historical Monthly Irrigation Data

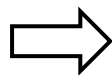


5-year average (FY 2018 – FY 2022) of May-August irrigation load.  
(Additionally, September data to establish shape)

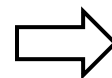
**Bonneville will, working with the Customer, use the most reasonable substitute data.  
Information already possessed by the Customer is the starting point.**

# The IRD Rate

Discount is fixed,  
adopted from TRM  
BP- 24, **37.06%**



Used, each rate  
case, to derive a  
\$/MWh rate  
discount

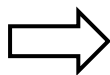


BP-24 IRD is  
***\$11.57/MWh***

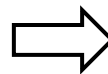


# The IRD Rate

Proposed methodology is dynamic



Increasing the \$ discount when the cost of power increases



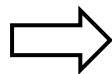
Decreasing the \$ discount when the cost of power decreases





# The IRD Rate

Program costs  
Similar to RD  
(~\$22 Million/yr)



Assuming an  
increase of 5-10%  
eligible irrigation  
loads



Discount fixed for  
term of the contract  
~30%-35% (TBD)



# IRD – PoC/PRDM

		Change in total IRD Program Cost (\$ 000s)				
		Eligible Irrigation Load (aMW)				
Assumed Cost of Energy Block (\$/MWh):	\$ 31.22	BP24	BP24 + 5%	BP24 + 10%	BP24 + 15%	BP24 + 20%
		<b>214.80</b>	225.53	236.27	247.01	257.75
		Eligible Irrigation Load (MWh)				
Current (BP24) Prog Cost (\$ 000s):	\$ 21,777					
\$/MWh Discount:	% Discount:	<b>1,881,605</b>	1,975,685	2,069,765	2,163,845	2,257,925
\$ 9.37	30.00%	\$ (4,154)	\$ (3,273)	\$ (2,392)	\$ (1,511)	\$ (630)
\$ 9.68	31.00%	\$ (3,567)	\$ (2,657)	\$ (1,746)	\$ (835)	\$ 75
\$ 9.99	32.00%	\$ (2,980)	\$ (2,040)	\$ (1,100)	\$ (160)	\$ 780
\$ 10.30	33.00%	\$ (2,392)	\$ (1,423)	\$ (454)	\$ 516	\$ 1,485
\$ 10.61	34.00%	\$ (1,805)	\$ (806)	\$ 193	\$ 1,191	\$ 2,190
\$ 10.93	35.00%	\$ (1,217)	\$ (189)	\$ 839	\$ 1,867	\$ 2,895
\$ 11.24	36.00%	\$ (630)	\$ 427	\$ 1,485	\$ 2,542	\$ 3,600
<b>\$ 11.57</b>	<b>37.06%</b>	\$ (0)	\$ 1,081	\$ 2,170	\$ 3,258	\$ 4,347

Initial assessment indicates that eligible irrigation loads will rise by about 15% between RD and PoC (using the new reference irrigation years). New customer entrants may result in a somewhat higher increase.

To avoid a change in the total IRD program costs, the discount rate would need to be reduced from the current rate of 37.06%.



# Questions



# LOW DENSITY DISCOUNT (LDD)



# LDD History



May 28, 2024

Section 7(d)(1) of the Northwest Power Act

Avoid adverse impacts on retail rates of customers with low system densities

Program changes are made in Section 7(i) rate proceedings



# LDD – RD/TRM

FY 2023

53 Customers

FY 2023

~\$40 Million/year

Increase average  
effective PF rate  
~ 2% (\$0.69/MWh)



# LDD - RD/TRM

Applicable to LF,  
Slice/Block and  
Block

Eligible discount  
will not exceed  
7%

Applicable  
discount\* for  
Above-RHWM  
load

Adjustment for  
Very Low  
Density

Phase-in  
adjustment

Annual eligibility  
determination

\*Applicable discount can exceed 7%



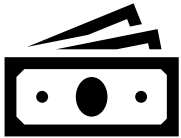
# LDD - RD/TRM: Eligibility Criteria



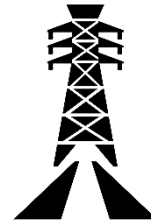
Serve as an electric utility offering power for resale to retail consumers



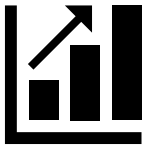
Kilowatt-hour to investment ratio (K/I) must be less than 100



Pass the benefits to its eligible consumers within BPA's service territory



Consumer per Pole Miles (C/M) ratio must be less than 12



Average retail rate exceeds BPA's average PF rate by 25 percent

# LDD - RD/TRM: Determine Eligible Percentage



Kilowatt-hour to investment ratio (K/I) must be less than 100



Consumer per Pole Miles (C/M) ratio must be less than 12

Sum of the corresponding discount for K/I and C/M = Eligible Percentage

**Table B**  
LDD Eligible Discount percentage

Percentage Discount	Applicable Range for kWh/Investment (K/I) Ratio	Applicable Range for Consumers/Mile (C/M) Ratio
0.0%	$35.0 < X$	$12.0 < X$
0.5%	$31.5 < X \leq 35.0$	$10.8 < X \leq 12.0$
1.0%	$28.0 < X \leq 31.5$	$9.6 < X \leq 10.8$
1.5%	$24.5 < X \leq 28.0$	$8.4 < X \leq 9.6$
2.0%	$21.0 < X \leq 24.5$	$7.2 < X \leq 8.4$
2.5%	$17.5 < X \leq 21.0$	$6.0 < X \leq 7.2$
3.0%	$14.0 < X \leq 17.5$	$4.8 < X \leq 6.0$
3.5%	$10.5 < X \leq 14.0$	$3.6 < X \leq 4.8$
4.0%	$7.0 < X \leq 10.5$	$2.4 < X \leq 3.6$
4.5%	$3.5 < X \leq 7.0$	$1.2 < X \leq 2.4$
5.0%	$X \leq 3.5$	$X \leq 1.2$

# LDD - RD/TRM

Eligible  
Discount

vs

Applicable  
Discount

$$\text{applicableLDD} = \text{eligibleLDD} \times \max \left( \frac{\text{adjTRL}}{\text{RHWM}}, 1.0 \right)$$

where:

*applicableLDD* = LDD percentage to be applied to a customer's bill

*eligibleLDD* = LDD percentage indicated by the customer's eligibility factors

*adjTRL* = customer's Total Retail Load less output of Existing Resources and  
NLSLs

*RHWM* = customer's Rate Period High Water Mark

# LDD - RD/TRM

## Applicable Discount Calculation Example

**Eligible Percent = 7%, RHWM = 5.881 aMW,  
Above-RHWM 2.204 aMW, Adjusted TRL= 8.085 aMW**

BP-24 RHWM	AdjTRL aMW FY2024	LDD adjTRL/RHWM FY2024	FINAL eligible LDD FY2024	FINAL Applicable LDD FY2024
5.881	8.085	1.37477	7.0%	9.623%

# LDD – PoC/PRDM

Applicable to LF,  
Slice/Block, and  
Block

Five eligibility  
criteria

Max eligible  
discount 7%

Adjustment for  
Very Low  
Density

Phase-in  
adjustment

Treatment for  
Joint Operating  
Entity



# LDD - PoC/PRDM

**Eligibility  
determination  
period**



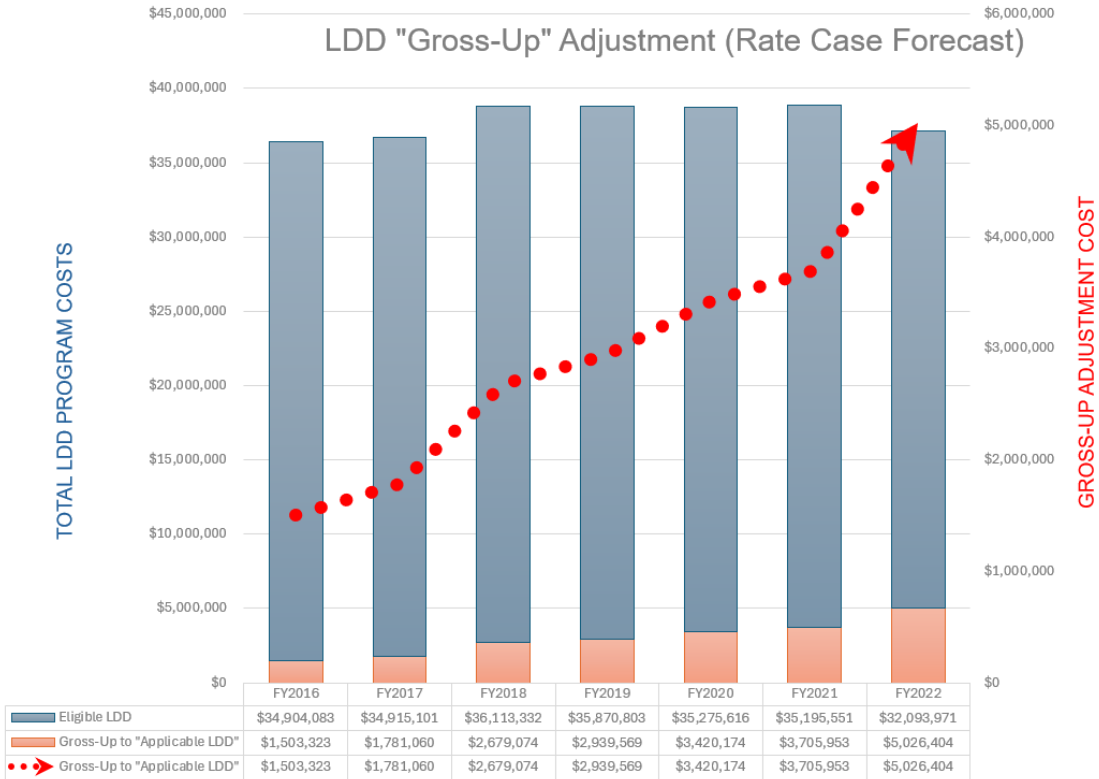
**Final PoC Policy  
Rate Period**

**Eliminate  
Applicable  
Percentage**



**Eligible Percentage  
Applies to T1 only**

# LDD – PoC/PRDM



Customers are, with a few exceptions, not “outgrowing the program,” even as their Above-RHWM loads grow.

The costs attributable to the “Gross-Up” adjustment are expected to continue to grow.

# LDD - PoC/PRDM

## Discussion: Eligible Percentage Applies T1 only

- Intent is to remove Above CHWM costs from Tier 1 cost pool
- Applicable LDD costs are due to Above RHWL load
- How best to mitigate impact transitioning from RD to POC contract?
  - Increase eligible % cap
  - Adjust K/I and C/M table
  - Other options

## LDD – PoC ROD Discussion

*Should Bonneville increase the 12 consumers per pole mile (C/M) ratio threshold for eligibility?*

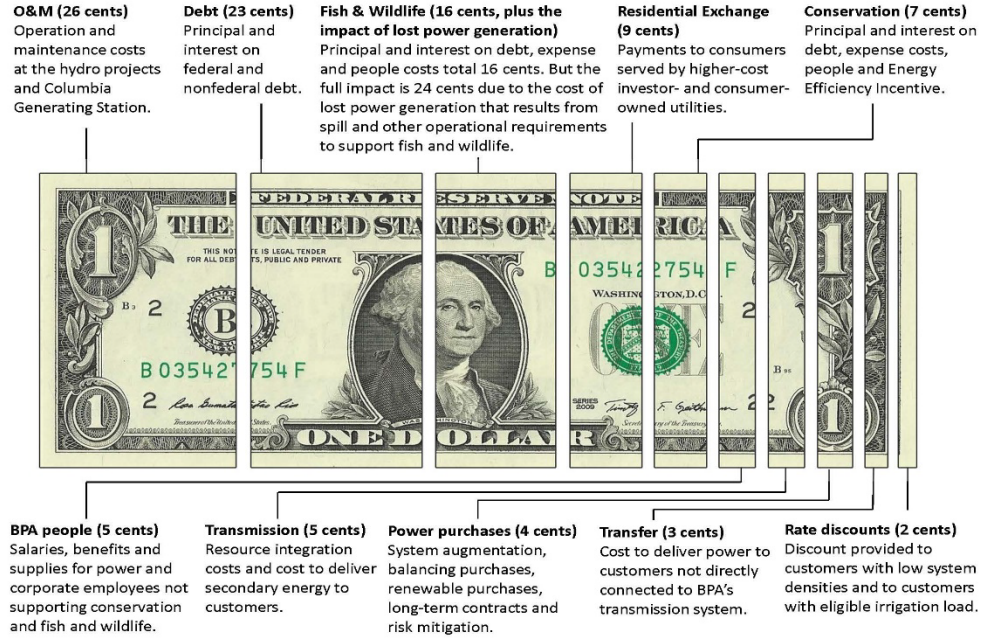
*Should Bonneville evaluate how underground distribution lines are accounted for in the C/M ratio?*



# Cost of Rate Discounts - \$0.02 per \$1

BP-22 rate period (Oct. 1, 2021, through Sept. 30, 2023)  
Updated 7/1/2021

## How BPA spends a dollar of its power revenues



# Questions



# Conclusion & Next Steps



# June and July Schedule

## Workgroup #4 6/11

June 21, Workshop #7

- Chapter 12: Conditions for Revision
- Chapter 13: Revision Processes

### 2029 PRDM

- Definitions
- Chapter 1 – Background & Purpose
- Chapter 2 – Cost Allocation
- Chapter 3 – Federal System
- Chapter 4 – T1 Eligibility (CHWM) Move to POC
- Chapter 5 – Tier 1 Rate Design
- Chapter 6 – Tier 2 Rate Design
- Chapter 7 – Shared Rate Plan – Delete
- Chapter 8 – RSS
- Chapter 9 – Risk Mitigation
- Chapter 10 – Other Rate Design
- Chapter 11 – Approval and Duration – Delete/Move
- Chapter 12 – Conditions for Revision
- Chapter 13 – Revision Processes

## Workgroup #5 7/9

July 22, Workshop #8

- PRDM Draft Document Review



# Parking Lot

Issue	Action	Note
Environmental Attributes T1, T2	New section in Chapter 2	
WRAP and PRM-Related Services	Contract negotiations and Chapter 5 through Peak Load Variance Charge	
Battery Treatment	Contract negotiations, maybe PRDM, likely future 7(i) process	
Risk framework (e.g., RDC & Secondary energy credits)	Chapter 2, Chapter 9, or potential future 7(i) process	
Designated System Obligations	Chapter 3	
Vintage Tier 2 not flat block	Contract negotiations and potential PRDM	
Resource Acquisition Strategy and Execution	Resource Program and Operations	
New Resources Rate Design	Contract negotiations and applicable 7(i) process	

