



TO

THE BONNEVILLE POWER ADMINISTRATION



**REPORT OF THE INDEPENDENT EVALUATOR
REVIEW AND VALIDATION
2019 OVERSUPPLY MANAGEMENT PROTOCOL FILINGS**

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Submitted by:

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REPORT OF ACCION GROUP, LLC
INDEPENDENT EVALUATOR FOR BONNEVILLE POWER ADMINISTRATION
REVIEW AND VERIFICATION OF 2019 FILINGS

I. EXECUTIVE SUMMARY

Accion Group, LLC (“Accion”) was selected by Bonneville Power Administration (“Bonneville” or “BPA”) to serve as Independent Evaluator (“IE”) for the Oversupply Management Protocol Program (“Program” or “OM Program” or “OMP”). Accion created and administers the Website (“Website” or “Program Website”) through which the Program is managed.

The OMP provides for compensation for Generators that opt to participate in the Program when their generation is displaced by Federal generation. Bonneville designed the Program to ensure displacement is done on a least-cost basis to ensure that lower-cost Generators are displaced prior to higher-cost Generators. All Generators must submit data in support of their costs. The Program is conducted through the Program Website designed to the specifications identified by Bonneville. The Website provides a disclosure form to be completed and submitted by Generators for each generating facility located in Bonneville’s balancing authority area. Following the submittal of the disclosure form, the IE verifies that the Generators’ claimed costs are supported. The process used by the IE for Verification (“Verification Process” or “Process”) was devised by Bonneville, in coordination with the IE, to provide Bonneville with confidence that claimed costs are fully supported by documentation, thus avoiding additional review tasks each time losses are claimed. The Verification Process provides for the IE to randomly select and review the submissions of Generators to, in effect, “spot check” the data that was provided.

Twenty-two (22) Submissions were received this year from seventeen (17) Generators. Ten (10) submissions were randomly selected for Verification by the IE, and the IE subsequently reviewed and verified the costs claimed for each of the Submittals. Most Generators were familiar with the process due to previous participation in the Program, and generally, most provided adequate support documentation to facilitate an efficient Verification Process.

The IE conducted its initial review for the ten (10) randomly selected Generators following the Submittal period deadline. Of the ten (10) Generators selected for Verification, all submitted documentation and pricing information as part of the original submission, however, the IE found it necessary to request additional support documents or expanded explanations relating to claimed costs from two (2) of the randomly selected Generators.

The type of documentation Generators provide in support of their Submittal is left to the discretion of the individual Generator; however, documentation must be sufficient to verify costs claimed on their Submittal Forms.

Most Generators provided documentation typical to the industry, but unique to the individual Generator. As an example, in some instances the Generator provided documentation that confirmed some claimed costs or established an obligation to deliver energy for only part of the year. In all instances where a bundled contract was submitted, the contract had an execution date prior to March 6, 2012.

The IE's initial review of the ten (10) generating facilities selected for Verification, including responses to the IE for additional information relating to two (2) of the submittals, found enough supporting information from each Generator to confirm the basis for claimed costs.

The IE additionally performed a cursory review of all Submittals by the Generators who were not included in the Verification Process, other than those submitted by Generators who opted out of the process, claiming zero (0) costs. A discussion of this cursory review is provided in this Report.

II. 2019 OVERSUPPLY MANAGEMENT PROTOCOL WEBSITE

A new "silo" was created on the Program Website for the 2019 Oversupply Management Protocol. As was with previous Program years, the website silo was provided using the previous (2018) year's Website design, to provide a degree of consistency for all participants: Generators, Bonneville personnel, and Website Administrators. The Website was edited and updated to reflect edits requested by BPA Administrators. The process remained user-friendly and familiar for returning participants. Information provided on the Website to assist Generators with their Submittals was reviewed and updated as needed.

All silos for previous Program years remain available on the Website so Generators can access their previous Submittals for historical reference. All data from previous years is maintained and accessible on the Website and available to the individual Generator and the IE. This made it possible to compare past Generator participation in the Program (2012, 2013, 2014, 2015, 2016, 2017 and 2018) to the current year's registered participants. This feature assisted Generators when reviewing past compliance filings and provided the IE with a data base for contacting those Generators who had registered in prior years, but not yet registered in 2019. As part of the annual review the IE compared prior filings with the 2018 submissions to identify any changes in generating facility ownership, etc.

The IE communicated with Bonneville regarding any questions as to Generator changes. Bonneville again experienced a change in personnel designated to manage the Program. As has

been consistent in past Program years, Bonneville personnel were responsive to all inquiries from the IE, and in all instances, provided requested information promptly and completely.

2019 PROGRAM LAUNCH

The 2019 Website was launched on March 1, 2019. The IE identified the list of Generators registered on the 2018 Program Website to determine which Generators should be contacted and invited to register to participate in the 2019 Program. Additionally, the IE was contacted by two (2) Generators prior to the 2019 Website launch date, to inquire about participation.

The following Announcement, provided by Bonneville, was posted on the Announcement Page of the Website, and sent to all Generators registered on the 2018 Website, notifying them to register for the 2019 Program:

*Posted (PPT)
3/1/2019 6:22:57 AM*

Announcement

As spring approaches, so do the natural elements that provide the Northwest with abundant energy resources. Each year, generators with eligible displacement costs must submit those costs in March, in order to receive compensation per our Oversupply Management Protocol (OMP) adopted as Attachment P of our Tariff in 2012. This is a Tariff requirement, and not an indication that an OMP event is imminent.

BPA's OMP is a tool that BPA can use at any point in the year to address oversupply issues, but historically those events are most likely to occur during the spring runoff. BPA will, to the best of its ability, give notice if there is a risk of implementing the OMP via Tech Forum notice. Operations information related to hydro, thermal and wind conditions and transmission loading can always be found on the BPA Oversupply website at www.bpa.gov/goto/oversupply.

Questions about BPA Oversupply Management Protocol may be directed to techforum@bpa.gov with Oversupply in the subject heading.

As of Friday, March 1, 2018, generators can start registering on the Accion site for 2019 cost submittals at <https://oversupply.accionpower.com>. Please note: Regardless of generators' registration on a prior year's site, new registration on the 2019 site is necessary for submitting 2019 cost submittals. Per Attachment P, Oversupply Management Protocol, generators must submit their facility's displacement costs by March 15, 2019 for inclusion in the Least-Cost Displacement Cost Curve. Updates have been made to the site for submitting displacement costs.

Failure to submit displacement costs for a facility will result in a displacement cost of \$0/MWh for that facility. Additional details on the protocol and guidelines for displacement costs are available in Attachment P and in the Oversupply Management Protocol Business Practice.

As always, generator operators and owners should also update their minimum generation levels in the Customer Data Entry system. Information regarding minimum generation levels can be found in the Oversupply Management Protocol Business Practice Section C.

Any questions regarding the Accion website should be directed to Sheri Vincent-Crisp at (603) 229-1644, svincentcrisp@acciongroup.com, or Harry Judd at (603) 229-1644, hjudd@acciongroup.com.

For the most up-to-date calendar of events, please visit the BPA Event Calendar.

(Ref.# 1)

*For problems concerning the RFP Process please contact the IE
For technical problems with this website please contact the Accion Power Site Administrator*



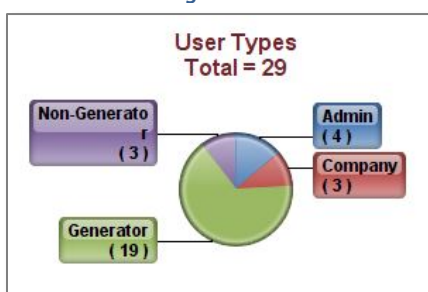
REGISTRANTS AND SUBMITTALS ON THE 2019 WEBSITE

The IE reviewed the 2019 Generators that had registered to participate in the 2019 Program and identified any Generators that participated in the 2018 Program but were not registered on the 2019 Website. For those that had not registered, the IE contacted them using registration data from the 2018 Website. Initially an email was sent, and if unresponsive, each Generator was contacted by telephone.

Twenty-nine (29) individuals registered on the 2019 Website as Generators, Bonneville personnel or Website Administrators.

The following charts show the status of both registrations and Submittals as of the date of this Report, and are shown in real-time on the Program Website.

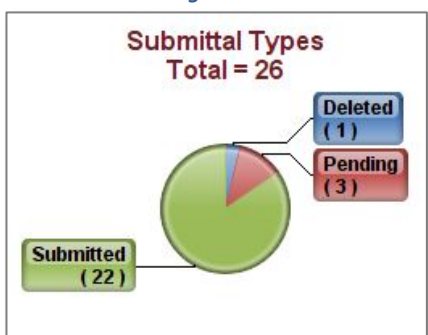
Figure 1



Total Registrants: 26

Generators Registered:	19 ¹
BPA Personnel Registrants:	2
Site Administrator Registrants:	4
Non-Generator Registrants:	3 ²

Figure 2



Total Submittals: 22

One (1) Submittal was started and subsequently deleted by a Generator and a new Submittal was completed. Two (2) Submittals remained pending, as they were used by the IE for testing purposes and one (1) Generator left one (1) of its Submittals pending.³

MESSAGES AND COMMUNICATIONS

Generators and the IE used the Message Board on the Website to correspond with each other. If Generators had questions or concerns regarding Submittals or the process, they used

¹ Includes one Administrative Test Registration.

² The Non-Generator Registrant represented one (1) BPA Administrator identified as IT, for Website/Security Testing purposes.

³ In some instances, Generators started a submission form, but left it incomplete, leaving those forms "pending." All Generators submitted at least one completed form, so the IE did not probe to determine why any pending form was not completed.

the Message Board to send a confidential message to the IE, and the IE responded also using the Message Board. In this manner a permanent record of all conversations is maintained on the Website for future reference. As of the date of this Report, six (6) Generators used the Message Board to send their questions or submit additional information regarding their Submittals. The total number of messages sent by these Generators was 56⁴, and twenty-nine (29) messages were sent by the IE to Generators asking for clarification, confirming submittals, or responding to questions.

The IE and Bonneville also received emails directly from two (2) Generators indicating they were not participating in the 2019 Program. Two (2) Generators contacted the IE via the OMP Program Website Message Page seeking confirmation of their status regarding participation in the 2019 Program.

Information from Generators was collected on the Program Website. Each Generator was provided a confidential, individual Submittal Book with a separate file system for each generating facility identified by the Generator. If Generators responded to telephone inquiries with return calls or direct email responses, the IE transferred the information to the corresponding Message Page, to maintain a record for future regulatory review.

III. SUBMITTAL PROCESS

Via the Website, on their Submittal Form, each Generator was required to provide monthly cost data for Light Load Hours (“LLH”) and Heavy Load Hours (“HLH”). Alternatively, the Generator could decline to claim LLH or HLH by a simple “click” on the Submittal Form, resulting in “0” costs claimed. Generators were also provided the option of claiming Renewable Energy Certificates (“RECs”), or, alternatively, declining to do so.

As previously noted in this report, all the data from previous years’ Programs is maintained and accessible (archived) on the Website and available to the individual Generator and the IE. As part of the annual review the IE compared prior filings with the 2018 submissions to identify any changes in Generating Facility ownership, etc., and communicated with Bonneville regarding any questions as to Generator changes.

When completing the online Form, Generators were provided the opportunity to revise their statement of costs before submission. Also, Generators are permitted to revise cost data on a prospective basis, with the revised cost data being employed two (2) months after the month in which the revision was submitted. As of the date of this report, no Generators submitted revised Submittals. If a Generator submits a revised Submittal(s), once the revised Submittal(s) is eligible, the respective original Submittal(s) would be withdrawn by the IE and

⁴ Fifty-six (56) messages represented questions regarding the Oversupply Program and the submittal process, requests for confirmation of their submittals, and responses to requests from the IE.

replaced by the newly revised Submittal(s) to be included in the Displacement Cost reports or the Pricing Reports generated each month and released on the Website to Bonneville personnel authorized to receive the information.

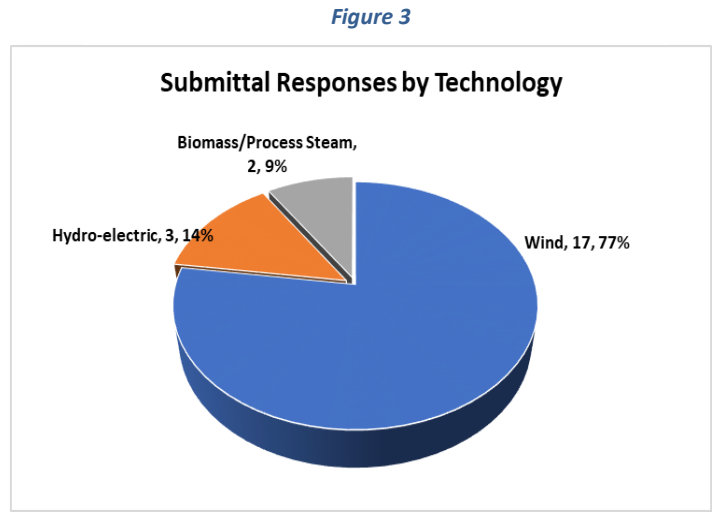
Once the initial Submittal deadline passed, the IE reviewed the status of registrations and Submittals, and noted that all Generators with the exception of one (1) which had registered to participate in the Program had provided their Submittal Forms. After follow-up, it was determined this was due to Generator Facility ownership changes and change in the personnel responsible for their Facility’s information, and responses were forthcoming once the individual responsible for submitting the information received direction from the IE and became familiar with the process.

Most Generators provided sufficient information in a timely manner, so the IE could begin review of eligibility, with no need for an extension.

SUBMITTAL RESPONSES

Seventeen (17) Generators submitted twenty-two (22) Submittal Forms as shown in the ***Submittal Response by Technology*** chart in ***Figure 3***.

Generators were required to upload documentation supporting the Displacement Cost data included in their Submittal Forms. All Generators provided at least one document unless they did not claim costs on their Submittal. Details regarding the quality and number of Required and Supporting Documents provided by Generators for each Submittal are shown in ***Tables 3 and 4*** of this Report.



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IV. VERIFICATION PROCESS

The Verification Process was undertaken in a manner to minimize the burden on Generators. Accion used the same model used in prior years to randomly select the Submittals that would be subject to additional scrutiny. The randomization model was run repeatedly to confirm that random re-sorting occurred, and to effectively “scramble” the Submittals. The Submittals were entered into the process using the submission identification number, and not the name of the Generator or the project name, to avoid even the appearance of predetermination.

The following **Table 1** provides the randomized ranking of the Submissions for 2019.

Table 1
Randomized Ranking of Submissions

196-1	0.998190768	194-1	0.77778936
186-2	0.986323288	185-2	0.744227608
188-1	0.979491795	191-1	0.704687275
192-2	0.943006792	187-1	0.651553378
189-1	0.931756852	192-3	0.410385004
184-1	0.915386722	181-1	0.365315831
193-1	0.886284858	183-1	0.274024205
178-2	0.881493157	195-2	0.270753127
192-1	0.840544312	197-1	0.225607484
190-1	0.83889703	195-1	0.174156565
178-1	0.783600998	186-1	0.080580243

Table 2 identifies the ten (10) submissions selected for Verification by the IE. These ten (10) were taken from the randomization presented in **Table 1** and reordered to be in numeric order with the name of the Facility added (redacted in Table).

Table 2

FINAL SUBMISSION SELECTION FOR VERIFICATION	
Generator/ Identification Number	Facility
196-1	Redacted
186-2	Redacted
188-1	Redacted
192-2	Redacted
189-1	Redacted
184-1	Redacted
193-1	Redacted
178-2	Redacted
192-1	Redacted
190-1	Redacted

Table 3 is a summary of the initial review of each of the ten (10) Submissions selected for Verification. This is followed by a description of any instances when the IE reached out to clarify or collect additional information from Generators, and the status of each Verification for the selected Submissions.

Table 3

Summary of Verification Review by Independent Evaluator - April 2019

Submittal Number	Verification Document: PPA	Verification Document: Other	Notes
196-1	x		PPA dated 2/25/2010- Term of 15 years. Included: site maps, off-site fuel storage costs 2019-20; Annual CPI projections; calculations by month for current Program year; firm bundled REC confirmation.
186-2	x		Letter dated 4/25/2012 from Dept of Labor and Industries re: Certificate of Apprentice Labor Standard; WAC 480-109-200 Renewable portfolio standard explaining eligibility and target years etc.; LSR Service & Maintenance Agreement; Affidavit dated 7/8/2019 no executed contract to sell 2019 generated & REC
188-1	x		PPA ; 2019 IE Verification Form for Displacement Cost
192-2	x	x	PPA; Electric Service Agreement and Amendment; Price Summary Chart; CBE Rates Sheet
189-1	x	x	PPA; City Ordinance documents/Authorizations
184-1	x		PPA; Exhibits Offered for examples of Calculation and Guaranteed Energy/Short falls
193-1		x	Average REC \$ - REC Sales Transactions by Type; Current Adjustment Mechanism Chart; Transaction Confirmation-Firm RECs.
178-2	x	x	PPA-Amended/Restated PPA
192-1	x	x	PPA; Electric Service Agreement and Amendment; Price Summary Chart; CBE Rates Sheet
190-1	x	x	PPA; Price Schedule for 20-year Contract Term.

After completing the initial review of the Submissions selected for Verification, the IE was able to verify the Claimed Costs for eight (8) Submissions with no additional information needed. The IE reached out to the two (2) Generators identified as needing to provide additional information, and confirmed the supporting documentation was adequate to verify their claimed

costs.

The following provides a review of the Submittals Randomly selected for Verification.

SUBMITTAL 196-01

Required documentation provided with this submittal was a renewable PPA with a term of 15 years dated February 25, 2010. Also included were site map; documentation of off-site fuel storage costs for 2019-2020; Annual CPI projections; calculations by month for the current Program year; and firm bundled REC confirmation.

The IE requested further Verification of the price increase for 2019-2020 as compared to the previous 2018-2019 Program year. An explanation was provided by the Generator and accepted by the IE and BPA.

SUBMITTAL 186-02

The Required Documentation initially supporting this Submission was in the form of the following: Offers from Karbone for 2019; BAML-Karbone California Transcript/*2019 Renewable Energy Policy Round-up*; Pacific Northwest WA Compliant Green-e Eligible Wind RECs; and several Portfolio Volumes charts.

The IE determined the information did not provide firm documentation. The IE reviewed the 2018 Submittal Documentation in order to compare with the 2019 Submittal and supporting information. Additional documentation in the form of a Master Service and Maintenance Agreement dated August 2, 2010 was subsequently provided.

Further requests for pricing Verification resulted in the IE requesting Generator's Affidavit indicating they had not yet executed a contract to sell the RECS (per section c2B of the Attachment). An Affidavit was provided.

SUBMITTAL 188-01

The Generator provided a completed 2019 IE Verification Form for Displacement costs. This included the price for bundled energy and RECS pursuant to the Master Power Purchase and Sale Agreement dated May 28, 2008 for a 15-year term, which was also provided.

The IE requested further Verification of the price decrease for 2019-2020 as compared to the previous 2018-2019 Program year. An explanation was provided by the Generator and accepted by the IE and BPA.

SUBMITTAL 192-02

There were five (5) supporting documents provided in addition to the one required. The Required Document provided with this Submittal was a 20-year Renewable PPA dated April 14, 2008. Additional Supporting Documents included the Electric Service Agreement relating to the Facility

dated April 15, 2011, with initial term of 3 years, renewable annually, and the First Amendment to same, effective December 1, 2015. Also included was a Price Summary in effect as of 2/2019 and a Columbia Basin Electric Rates Sheet dated March 11, 2019. The IE found this sufficient documentation to support the Claimed Costs as provided on the Submittal Form.

SUBMITTAL 189-01

The uploaded Required Documentation included with this Submission was a City of Seattle Ordinance passed on July 11, 2011 and signed by the Mayor on July 18, 2011. The Ordinance is for the purchase of attributes in the form of renewable energy certificates that are necessary or convenient for meeting the requirements of the Washington State Energy Independence Act.

Also included was an executed Standard Contract Off System PPA for a term of 20 years, for Intermittent Resources effective April 29th, 2010, with highlighted text, “[a]ll energy shall be prescheduled according to customary WECC scheduling practices.”

SUBMITTAL 184-01

Required documentation was a Power Purchase Agreement dated March 24, 2009 with a term of 20 years. Within the PPA, Exhibit B offered Examples of Calculation and Guaranteed Energy Amounts, short-fall amounts and shortfall liquidated Damages.

SUBMITTAL 193-01

This Generator provided a REC Transaction Confirmation Letter detailing values provided in the Submittal Form, along with a Master REC Purchase and Sale Agreement. Terms of the transaction are authorized by a Master Green Tag Purchase and Sale Agreement between Buyer and Seller dated as of July 13, 2007.

An Excel sheet was provided with a chart (dated April 15, 2019) of sales completed in 2018 by structured and unstructured type. The chart shows Energy/REC/GHG and Karbone Bids and Offers (for Average). Peak and Non-Peak calculations were provided, along with Transaction confirmation regarding Firm RECs.

SUBMITTAL 178-02

The Required Document provided was an Amended and restated PPA dated November 27, 1996, with a term of thirty (30) years. The IE determined there was sufficient supporting documentation from this Generator should displacement occur.

SUBMITTAL 192-01

There were five (5) supporting documents provided in addition to the one required. The Required Document provided with this Submittal was a 20-year Renewable PPA dated April 14, 2008. Additional Supporting Documents included the Electric Service Agreement relating to the Facility dated April 15, 2011, with initial term of 3 years, renewable annually, and the First Amendment

to same, effective December 1, 2015. Also included was a Price Summary in effect as of February 2019 and a Columbia Basin Electric Rates Sheet dated March 11, 2019.

The same information was provided for this Submittal as was provided in Submittal 192-02, above, with the addition of a Membership Certificate certifying membership in Columbia Basin Electric Cooperative, Inc., and a chart of the Cooperative's Electric Rates, effective October 2015.

The IE found this sufficient documentation to support the Claimed Costs as provided on the Submittal Form.

SUBMITTAL 190-01

This Generator uploaded a PPA as the Required Document, dated and executed November 7, 2001 with an effective contract term for twenty-year (20) years. The Contract Number was noted on the PPA. Also provided was a wind payment rate interpretation of the PPA (The Price Schedule was provided for the 20-year contract term). The IE found sufficient documentation was present to support the Claimed Costs.

In all cases the information provided and reviewed was sufficient to complete Verification because the Supporting Documents identified the claimed displacement values. The validation of claimed costs permits Bonneville to have confidence that the costs claimed by Generators are accurate.

Below, the IE summarizes a review of the submissions for the Generators not selected for validation. This cursory review was conducted with the IE determining if there was need to seek information from the individual Generators, beyond what was provided by each Generator at the time the Submittal Form was completed. The Program is premised on Generators providing correct data, supported by documentation requested by the IE as part of the Verification Process. This cursory review, along with the information provided in **Tables 3 and 4**, is provided so Bonneville has an appreciation for the quality and quantity of documentation provided by Generators.

V. CURSORY REVIEW OF SUBMITTALS NOT SELECTED FOR RANDOM VERIFICATION

The IE additionally performs a cursory review of all Submittals by the Generators who were not included in the Verification Process, other than those submitted by Generators who opted out of the process. The goal of this review is to summarize the quality of information provided by the responding Generators.

As part of the initial Submission process, Generators were required to provide documentation when costs were claimed. A majority of Generators provided extensive supporting documents. The following **Table 4** summarizes the number of required and supporting documents submitted by all Generators per Submittal.

Table 4

Required and Supporting Documents Provided Per Submittal

Submittal Number	Zero Costs	Selected for Verification	Required Documents Provided	Additional Support Documents Provided	IE Requested Additional Verification
178-1			1		
178-2		x	1		
181-1			1		
183-1			1	1	x
184-1		x	1		
185-2			1	3	x
186-1			1	2	2
186-2		x	1		2
187-1			1		x
188-1		x	1		x
189-1		x	1	1	
190-1		x	1	1	
191-1			1	2	
192-1		x	1	5	
192-2		x	1	3	
192-3			1	3	
193-1		x	1	2	
194-1			1	3	3
195-1	x		n/a		
195-2	x		n/a		
196-1		x	1		1
197-1			1		1

SUBMITTAL 178-01

The Generator provided a PPA dated November 30, 2000 for a term of twenty-five (25) starting in 2003, with Attachments and Exhibits. The IE determined there was sufficient supporting documentation.

SUBMITTAL 181-01

Required Supporting documentation provided by this Generator was a Renewable Resource PPA executed on August 26, 2008 for a 20-year term. The PPA included pricing information. Also provided was a completed 2019 IE Verification Form for Displacement Costs using the Verification Form previously provided by the IE. Additionally, PPA pricing for bundled energy and RECs and contract prices were provided. The IE found this enough documentation to support the

Claimed Costs provided on the Submittal Form.

SUBMITTAL 183-01

The Required Document uploaded by this Generator to support cost claims, was an “Execution Copy” PPA dated June 24, 2009 with a term of twenty (20) years. Additional Supporting Documentation also includes a document explaining Cost of Displacement. At the request of BPA, the IE requested further explanation of price decreases from the last Program year and sufficient explanation was provided.

SUBMITTAL 185-02

Various documentation was provided by this Generator; Wind Project Displacement Cost Summary Chart, and a PPA dated July 14, 2009. Also provided was a confidential letter to the IE dated March 15, 2019, with detailed calculations and Project Cost of Displacement July 2019 through March 2020. The IE found sufficient documentation to support the Claimed Costs.

At the request of BPA, the IE requested an explanation of price decreases claimed for 2019, and a sufficient explanation was provided by the Generator.

SUBMITTAL 186-01

Upon request for Verification, this Generator indicated that, per section c2B of the Attachments P, it had not yet executed a contract to sell the RECs, and subsequently uploaded market documents from 2019 Renewable Energy Policy Round UP.

Generator additionally provided a letter dated April 25, 2012 from the Department of Labor and Industries re: Certificate of Apprentice Labor Standard. Documentation in the form of WAC 480-109-200 Renewable portfolio standard was provided explaining eligibility and target years.

SUBMITTAL 187-01

This Generator provided a completed IE Verification Form Template used in past Program years updated for the current 2019 Program Period to show total Displacement Cost. This Form was completed using the Verification Form from past Program years as a template. In the 2019 Program year Submittal, the 2019 IE Verification of Displacement Cost Form refers to PPA prices for RECs and Energy. The PPA was provided.

Following the first month of Verification reporting of Displacement Costs, the IE Requested explanation of price changes 2018-19. An explanation of decreased pricing was provided by the Generator and accepted by the IE and BPA.

SUBMITTAL 191-01

The Required Document provided was an Excel Sheet with Contract Energy Price and Contract REC Price. The Index page to PPA included Contract Purchase Price redacted except for 2019 and

2020. Additional documentation was provided as follows: Renewable Energy Credit Purchase Agreement per original date 5/15/1994; A Renewable Energy Credit Purchase Agreement from April 2018 to April 1, 2019; ICAP National Greene-e Bid/Offer chart; and a Karbone Bid/Ask Pricing Chart dated February 28, 2019. The IE found there was enough documentation to support the Claimed Costs as provided on the Submittal Form.

SUBMITTAL 192-03

This Generator provided a 20-year Renewable PPA dated August 14, 2008, as a Required Document. Generators were invited to self-select documents to support claims of loss in the event of curtailment. This Generator provided two documents: The Electric Service Agreement relating to the Facility and Delivery Service Schedule dated April 15, 2011, with an amended effective date of December 1, 2015, and PUC OR No. 36 – Schedule 47 regarding Large General Service/Delivery Service. Also included was an Oregon Price Summary Chart as of February 2019 and Columbia Basin Electric Rates Sheet dated March 11, 2019. The IE found this sufficient documentation to support the Claimed Costs as provided on the Submittal Form.

SUBMITTAL 194-01

Notwithstanding repeated requests from the IE, this Generator failed to provide documentary that established any loss in the events of a curtailment. The Generator claimed increased costs in 2019 when compared with the 2018 Submittal. Three (3) documents were provided with the Submittal. They were a *Tullett Prebon Pricing Chart* showing Peak and Off-Peak pricing dated March 13, 2019, the Generator's "BGC Environmental Brokerage Services Daily REC Bulletin" and "Karbone Pricing Chart". The IE requested documentary support for price increases from 2018 to 2019 at the request of BPA. The IE made repeated requests for definitive documentation that the Generator would incur a loss in the event of curtailments. The Generator provided an explanatory statement, without additional support. In response, the Generator provided a PPA. The PPA was undated and failed to identify any period during which there was a firm obligation to deliver from the Generator. Accordingly, the IE was unable to confirm the Generator was eligible to be included in the Program.

Submittal 195-01

Generator claimed zero (0) costs.

SUBMITTAL 195-02

Generator claimed zero (0) costs.

SUBMITTAL 197-01

The required Document provided by the Generator was a Power Purchase Agreement dated as of July 28, 2008 for a term of 15 years. Appendix A of the PPA provided an Excess Energy -

Payment schedule that provided purchase price for Delivered Energy and non-excess Energy delivered.

At the request of BPA, the IE requested an explanation of price decreases claimed for 2019, and the explanation was accepted as provided by the Generator. The IE found sufficient documentation to support this Generator's Claimed Costs.

VI. COMPARISON OF 2018 AND 2019 RESULTS

In 2018, eighteen (19) Generators filed thirty-four (34) Submittals, of which all Submittals included at least one Required Document. Of the thirty-four (34) Submittals that included Required Documents, twenty-three (23) also included additional Supporting Documents. Two (2) Generators' Submittals claimed zero costs. Ten (10) Submittals were selected for random Verification, thus there were twenty-six (24) Submittals that were not part of the random Verification Process.

As in 2018, in 2019 the IE also conducted a summary review of the filings provided for the submissions that were not selected for Verification. In 2019, nineteen (19) Generators filed twenty-two (22) Submittals, of which all Submittals included at least one Required Document. Of the twenty-two (22) Submittals that included Required Documents, eleven (11) also included additional Supporting Documents. Two (2) Generators' Submittals claimed zero costs.

VII. CONCLUSIONS

The IE randomly selected ten (10) submissions for the annual Verification Process. As part of the Submission process, each Generator was required to provide supporting documentation of their choosing. After reviewing the documents proffered with the ten (10) Submissions, the IE found the need to request additional documentation and/or explanations from two (2) Generators because the initial submissions were insufficient for the IE to complete the Verification process.

The IE reviewed the 2018 Submittals, and compared them to the current 2019 Submittals, to confirm consistency in pricing and documentation. The IE determined that all ten (10) Submissions randomly selected for Verification had sufficient documentation to enable the IE to affirm the Submissions.

In addition to the reviewing the ten (10) randomly selected submissions for Verification, as noted previously in this report, the IE performed a cursory review of all 2019 Submissions along with comparisons to 2018 Submissions. The information and claims were consistent in both Program years, with additional supporting documents requested and provided by some Generators this year to explain any noticeable price variations. With the additional information provided, the IE was able to verify all Submissions with the exception of one, discussed previously in this report.

A. REQUIRED DOCUMENTATION

As was the case in 2018, this Program year the IE maintained a simple process for Generators by reviewing the completed Submittal Forms and their respective Required and/or Supporting Documentation prior to determining a need to reach out to the Generators selected for Random Verification. In this manner, the Generators that provided sufficient support for the data collected in their Submittal Forms were not required to complete additional forms or submit further Documentation for Verification. The IE would then reach out to the Generators singularly, if additional support was needed for their claimed Costs.

The IE notes a consistent number of Generators that provide specific documentation making the Verification process efficient and accurate. The fact remains that some Generators only make market sales and, therefore, it remains challenging to provide an easy way for that to be reported. At the same time, most Generators have participated in the Program for several years and are therefore more familiar with the documentation required and less resistant to accepting the need for Verification of claimed costs.

The IE continues to suggest providing a list of preferred or acceptable Supporting Documents to assist Generators in establishing the value of loss in the event of Curtailment, such as a firm PPA, or other agreement that would definitively verify their Cost Claims.

The IE works closely with BPA in order to identify submitted price differentials from year to year. In 2019, BPA's initial monthly review of the pricing as reported in the first monthly review identified certain Submittals where there were substantial differences when compared with the 2018 Submittals. The difference included both increases and decreases to the 2018 claimed prices. Consequently, there was a need for the IE to confirm the legitimacy of the 2019 claimed prices. BPA provided the IE with those instances for which an explanation for the irregularities was appropriate, and the IE reached out via the Website Message Board to each Generator requesting documentary support for the claimed increase or decrease from the previous year's claimed costs. While most Generators promptly provided enough explanation, it was necessary for the IE to follow-up with some until additional documentation was provided to support all but one (1) of the pricing changes. One Generator was unable to provide data or a viable explanation to explain their pricing and was excluded from the OMP Program. In the event the Generator provides sufficient documentation that confirms the claimed costs, the IE will revisit this determination with the BPA personnel.

B. GENERATORS/CONTACTS

Coordination with Bonneville regarding changes in Generators and contacts increases the efficiency of managing the Oversupply Program Submittals, and any subsequent requests for data Verification. This communication continued in the 2019 Program Year. The IE was consistently provided updated information upon request, and questions regarding eligibility for participation

in the OMP were provided promptly. Having the latest contact information when the new Program Year was launched, and when starting the review process, improves the initial response rate, thus avoiding the need to have numerous conversations with Generators.

As was the case in previous years, there were some changes in Generator personnel such that those responsible for managing participation in past Program years were no longer involved in 2019; this resulted in new participants needing assistance with the process. With the assistance of BPA, the IE was successful in identifying these changes and reached out to those individuals to ensure they were familiar with the OMP and Submittal process and had access to their previous OMP Submittals for reference.