



TO
THE BONNEVILLE POWER ADMINISTRATION



**REPORT OF THE INDEPENDENT EVALUATOR
REVIEW AND VALIDATION
2021 OVERSUPPLY MANAGEMENT PROTOCOL FILINGS**

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REPORT OF ACCION GROUP, LLC
INDEPENDENT EVALUATOR FOR BONNEVILLE POWER ADMINISTRATION
REVIEW AND VALIDATION OF 2021 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 compensation to 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 in order to receive compensation for displacement. 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 Validation (“Validation Process” “Validation” or “Process”) was devised by Bonneville, in coordination with the IE, to provide Bonneville with confidence that claimed costs are fully supported by documentation. The Validation Process provides for the IE to review the submissions of Generators to validate the data that was provided.

Thirty (30) Submissions were received this year from twenty (20) Generators. In previous Program years, per Validation protocol, Ten (10) randomly selected Submissions were reviewed for Validation by the IE, and subsequently the IE reviewed and verified the costs claimed for each of the ten (10) Submittals. The IE has historically performed a cursory review of all Submittals by the Generators that were not included in the Validation Process, with the exception of those submitted by Generators who opted out of the Program, claiming zero (0) costs.

For the current 2021-22 Program year, at BPA’s request, the IE performed an in-depth review of all submissions for Validation, rather than ten (10) randomly selected submissions.

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 Validation Process. As is also the case from year-to-year, there were some new account managers who had not participated in past years, and therefore, needed some assistance.

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.

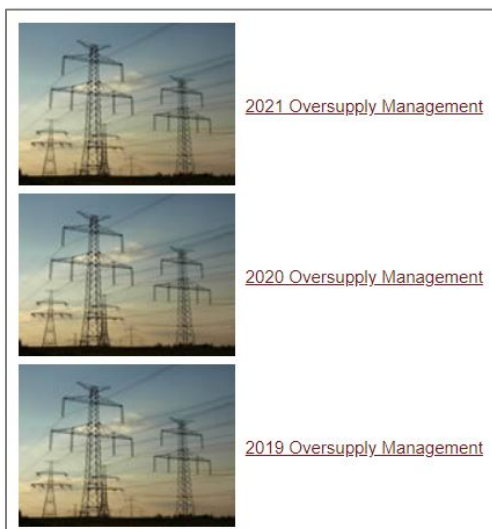
Most Generators provided documentation typical to the industry, but unique to the individual Generator. As an example, in some instances the Generator provided documentation that confirmed some claimed costs or established an obligation to deliver energy for only part of the year. In all instances where a bundled contract was submitted, the contract had an execution date prior to March 6, 2012, as required¹.

The IE conducted its initial review for all Submissions following the Submittal period deadline. Following the initial review, the IE found it necessary to request additional support documents or expanded explanations relating to claimed costs from some Generators. As a result of the preliminary review and subsequent in-depth review of the thirty (30) generating facilities, including responses to the IE's requests for additional information, the IE found enough supporting information from each Generator to confirm the basis for claimed costs.

II. 2020 OVERSUPPLY MANAGEMENT PROTOCOL WEBSITE



A new “Silo” was created on the Program Website for the 2021 Oversupply Management



Protocol. As was with previous Program years, the Website Silo was provided using the previous (2020) year's Website design, to provide a degree of consistency for all participants: Generators, Bonneville personnel, and Website Administrators. The Website was edited to reflect the current Program year and updated to reflect edits and/or improvements as discussed with 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

¹ Attachment P, Oversupply Management Protocol, Section 3.c.

Website so Generators can access their previous Submittals for historical reference. All data from previous years is maintained and accessible on Accion's Website and is available to the individual Generator and the IE. This makes it possible to compare past Generator participation in the Program (2012 through 2020) to the current year's (2021) registered participants. This feature serves to assist Generators when reviewing past compliance filings should they wish to do so, and also provides the IE with a data base for contacting those Generators who had registered in prior years but had not yet registered in 2021. As part of the annual review the IE compared prior filings with the 2021 submissions to identify any changes in generating facility ownership, etc.

The IE communicated with Bonneville regarding any questions as to Generator changes. Bonneville personnel were responsive to all inquiries from the IE, and in all instances, provided requested information promptly and completely.

2021 PROGRAM LAUNCH

The 2021 Website was launched on March 1, 2021. The IE identified the list of Generators registered on the 2020 Program Website to determine which Generators should be contacted and invited to register on the OMP Website to participate in the 2021 Program. The IE was contacted by one (1) Generators prior to the 2021 Website launch date, inquiring about participation in the Oversupply Management Program, and the timeline for registration and Submittal of displacement cost data on the OMP Website.

The following Announcement, provided by Bonneville, was posted on the Announcements Page of the Website, and sent to all Generators registered on the 2020 Website, notifying them to register for the 2021 Program:

ANNOUNCEMENTS

Posted (PPT)

3/1/2021 11:16:53 AM

Announcement

2021 Oversupply Management Protocol Reminder

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 BPA's Open Access Transmission Tariff (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 OMP via Tech Forum notice. Operations information related to hydro, thermal and wind conditions and transmission loading is available on the BPA Oversupply website at www.bpa.gov/goto/oversupply.

As of Monday, March 1, 2021, generators can start registering on the Accion site for 2021 cost submittals at <https://oversupply.accionpower.com>. Please note: Regardless of generators' registration on a prior year's site, new registration on the 2021 site is necessary for submitting 2021 cost submittals. Per Attachment P, Oversupply Management Protocol, generators must self-certify that the nameplate capacity and that the displacement costs for each generator is accurate. Please submit displacement costs for each generator by March 15, 2021 for inclusion in the Least-Cost Displacement Cost Curve. Failure to submit eligible 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.

BPA's annual OMP test will occur during the week of March 22, 2021. The test will be for one hour or less. BPA does not expect generation to be displaced below schedule for the test. All generators should limit generation to schedules or to Generation Estimates for behind-the-meter resources. No Cost Generators will not be required to move to minimum generation. BPA will send a reminder Tech Forum announcement the week prior.

BPA continues to waive loss return obligations in CDE during oversupply conditions. Notices for waiving losses are expected to be published on the day prior to the WECC Preschedule Trading Day. It is recommended that Customers continue to verify their loss obligations in CDE each morning prior to beginning trading. Entities continuing to schedule loss returns during hours where the obligation has been waived by BPA will have their loss return etags curtailed. Customers can refer to the Oversupply Management Protocol Business Practice Section E.2 for additional information on the waiving of loss return obligations during oversupply conditions.

As always, generator operators and owners should 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.

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

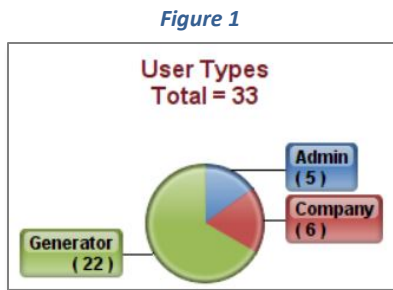
Any questions regarding the Accion website should be directed to Sheri Vincent-Crisp at (603) 229-1644 or (603) 731-7779, while working remotely svincentcrisp@acciongroup.com or Harry Judd at (603) 229-1644, hjudd@acciongroup.com.

REGISTRANTS AND SUBMITTALS ON THE 2021 WEBSITE

The IE reviewed the 2021 Generators that had registered to participate in the 2021 Program and compared the current year participants to those Generators that had participated in the 2020 Program but were not registered on the 2021 Website. For those that had not registered, the IE contacted them using registration data from the 2020 Website. Initially an email was sent, and if unresponsive, each Generator was contacted by telephone.

Thirty-three (33) individuals registered on the 2020 Website as Generators, Bonneville personnel or Website Administrators/the IE.

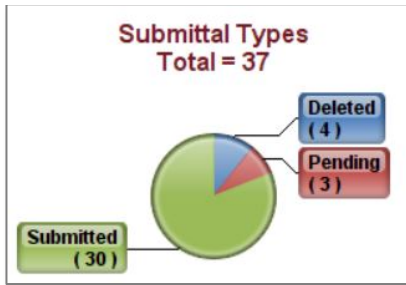
The following charts show the status of both registrations and Submittals as of the date of this Report and are shown in real-time on the Program Website. The charts can be re-formatted based on the user preference for chart type and data displayed.



Total Registrants:	33
Generators Registered:	22 ²
BPA (Company) Registrants:	6
Site Administrator Registrants:	5

² Includes two (2) Administrative Test Registrations.

Figure 2



Total Submittals: 30

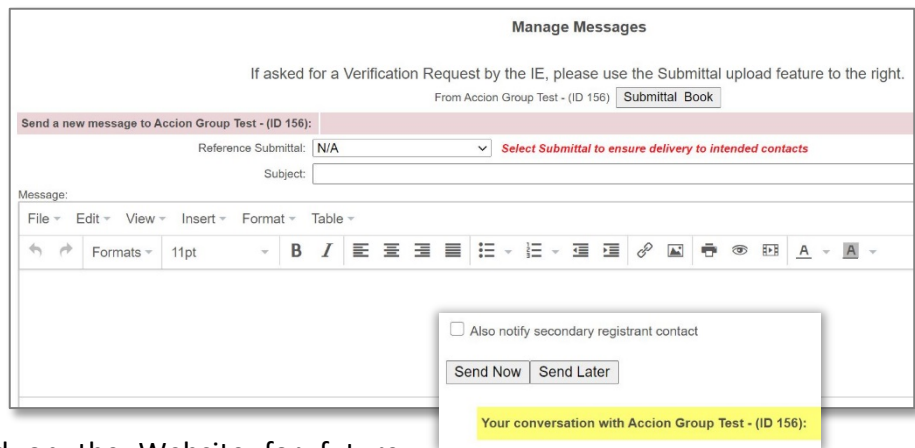
Four (4) Submittals were started and subsequently deleted by two (2) Generators and a new Submittals were completed. Three (3) Submittals remained pending, as two (2) were used by the IE for testing purposes and one (1) Generator left a Submittal pending .³

MESSAGES AND COMMUNICATIONS

A. Communications Between Generators and the IE

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 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.

Figure 3



As of the date of this Report, eight (8) 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 fourteen (14)⁴, and twenty-eight (28) messages were sent by the IE to Generators asking for clarification, confirming Submittals, responding to questions or requesting additional supporting documentation for Validation of Costs represented on Submittals.

³ In this instance, the Generator started a Submission Form, but left it incomplete, as this Submittal Form for this Plant had been previously completed and submitted, leaving the status showing "pending."

⁴ Messages from Generators represented questions regarding the Oversupply Program and the Submittal process, requests for confirmation of their submittals, and responses to requests from the IE.

The IE received an email directly from one (1) Generator inquiring if they had an obligation under the OMP to report pricing, since the project would be changing ownership on April 6, 2021, and if they should submit costs for just six (6) days in April. The IE reached out to BPA, and BPA responded that the Generator must register during those six (6) days in order to receive compensation for displacement. The IE then informed that Generator that it should register and provide cost data as it has in the past, and then notify the IE after the change in ownership to take whatever action may be needed. Alternatively, if the Generator did not register and submit cost data, they would not get compensated if displaced during an OMP event. The Generator decided to register and submit cost data for the period prior to the date ownership was due to change.

Three (3) Generators contacted the IE via the OMP Program Website Message Board seeking confirmation of their status regarding participation in the 2020 Program. The IE monitored the Submittals up to and during the few days following the Submittal due date of March 15, 2021 to make certain all Generators that wanted to participate had, and that Submittals were completed as intended. The IE reached out to one (1) Generator to assist with edits, as there was no displacement data submitted despite participation in previous Program Years. This was due to an error when filling out the Submittal Form. The information was corrected and then re-submitted with the correct data.

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.

B. Communications Between BPA and the IE

BPA Administrators and the IE used the Manager Message Board on the Website to correspond with each other, similar to the Message Board utilized for communications between the IE and Generators. If BPA had questions or concerns regarding Submittals or the process, they used the Message Board to send a confidential message to the IE, and the IE responded

Figure 4

The screenshot displays the 'Managers Messages' interface. At the top, there is a 'Managers Docs' button. Below it is a 'Send a new message:' section with a 'Subject:' input field and a larger 'Message:' text area. To the right of the message area is a 'To:' dropdown menu with options: '- Select Recipient -', 'Tucker, Mark', and 'Vincent-Crisp, Sheri'. Below the message area are 'Send Now' and 'Send Later' buttons. At the bottom of the interface, there is a header for the received message: 'Accion (Sheri Vincent-Crisp) 4/19/2021 1:57:10 PM' and 'To: Mark Tucker Response from IE'.

also using the Manager Message Board. In this manner a permanent record of all conversations is maintained on the Website for future reference.

III. SUBMITTAL PROCESS

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.

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. Three (3) Generators asked for access to their previous year Submittals and were directed by the IE as to its accessibility. At least one (1) was new to the program and sought historical submittal data for reference. As part of the annual review the IE compared prior filings with the 2020 submissions to identify any changes in Generating Facility ownership, etc., and communicated with Bonneville regarding any questions as to Generator changes. This comparison and discussion with BPA revealed that one Generator was no longer participating in the Oversupply Management Program in 2021.

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 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.

Three days prior to the March 15, 2021 Submittal deadline an email from the OMP Website was sent to all Generators that had outstanding Submittals, reminding them of the pending due date. The IE monitored the Submittal process, and once the initial Submittal deadline passed, the IE reviewed the status of registrations and Submittals, and noted that six (6) registered participants in the Program had not provided their Submittal Forms. After follow-up by the IE, three (3) submitted their data within one (1) day and one of the pending Submittals was a duplicate and remained pending. As was also the case in previous Program years the two (2) that remained outstanding were due to Generator Facility ownership changes or changes in the personnel responsible for their Facility’s information. Responses from the two (2) remaining Facilities were

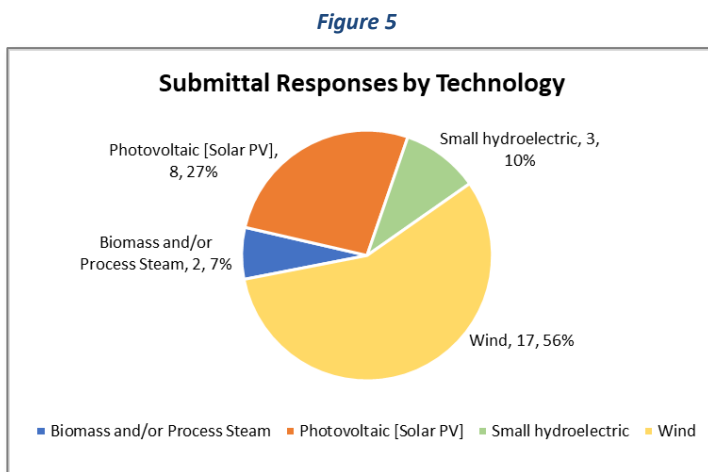
forthcoming once the individuals responsible for submitting the information received further direction from their facility managers and/or from the IE and became familiar with the process.

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

Twenty (20) Generators submitted thirty (30) Submittal Forms as shown in the *Submittal Responses by Technology* chart in **Figure 5**.

As part of the Submittal process, Generators were required to upload documentation supporting the Displacement Cost data included in their Submittal Forms. Most Generators provided extensive supporting documents, and all Generators provided at least one document unless they did not claim costs on their Submittal. A summary regarding the quality and number of Required and Supporting Documents provided by Generators for each Submittal is shown in **Table 1** of this Report.



IV. VALIDATION PROCESS

All completed Submittal Forms and their respective Required and/or Supporting Documentation were reviewed by the IE to determine if the supporting documentation they provided with their Submittal was sufficient to Validate their claimed costs. If additional supporting information was needed for their claimed costs, the IE reached out to the Generators singularly via the Website’s confidential Message Board.

The IE notes a consistent number of Generators that provide specific documentation making the Validation 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.

In all cases the information provided and reviewed was sufficient to complete Validation 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.

V. REVIEW OF 2020-2022 PROGRAM YEAR SUBMITTALS

The goal of this review is to summarize the quality of information provided by all responding Generators, 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 Validation Process.

INITIAL REVIEW

The IE performed an initial review once all Submissions had been received on the Website, prior to commencing with the in-depth Validation Process. During the initial review, the IE reached out to eight (8) Generators identified as needing to provide additional information. All provided sufficient information to cure the deficiencies. Subsequently, the IE was able to verify the claimed costs for the thirty (30) Submissions with no additional information needed.

Table 1 is a summary of the initial review of the documents provided with each of the thirty (30) Submissions and also provides insight into the quality and quantity of documentation provided by Generators. 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.

Table 1

Summary of Validation Review by Independent Evaluator - April 2021

Submittal Number	Verification Document: PPA	Verification Document: Other	IE Requested Additional Verification
300-01		3	
300-02		4	
302-01	x	3	
302-02	x	3	
302-03	x	5	
303-01	x	1	
305-01	x		
305-02	x		
305-03	x		
305-04	x		
306-01		6	
308-01			
308-02			

Submittal Number	Verification Document: PPA	Verification Document: Other	IE Requested Additional Verification
309-01	x	2	x
310-02	x		x 1 Message was sent to Generator requesting additional information regarding 310-02, 03, 04, 05
310-03	x		
310-04	x		
310-05	x		
311-01	x	1	
312-01	x		
312-02	x		
313-01	x	1	x
314-01	x	1	x
315-04	x	1	
317-01	x	1	x
319-01		1	x
320-01	x	4	x
322-01	x	2	x
323-01	x	6	
324-01	x		

SUMMARY REVIEW

The following provides a review of the 2021 Submittals (*2021 Review*). Also provided for each Submittal is the IE's review of the corresponding 2020 Submittals (*2020 Review*)⁵ for comparison and consistency of data provided by Generators for Validation.

The IE found there was sufficient documentation to support the claimed costs as provided on all Submittal Forms as noted in the reviews.

SUBMITTAL 300-01

2021 Review

This Generator claimed Unbundled RECS in their Submittal. The required documentation initially supporting this Submission was in the form of the following: Offers from Karbone for February 26, 2021; Compliant Green-e Eligible Wind RECs; and several Portfolio Volumes charts.

⁵ As referenced in the IE's 2020 OMP Validation Report.

Additionally provided was an explanation of Wind Curtailment Pricing Calculation. The IE reviewed the 2020 Submittal Documentation in order to compare with the 2021 Submittal and supporting information. Additional documentation in the form of a Master Service and Maintenance Agreement dated August 2, 2010 was also provided.

2020 Review

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 reviewed the 2020 Submittal Documentation in order to compare with the 2021 Submittal and supporting information. Additional documentation in the form of a Master and Maintenance Agreement dated August 2, 2010 was also provided.

SUBMITTAL 300-02

2021 Review

This Generator claimed Unbundled RECs and provided supporting documentation for Pricing Methodology per an Excel Chart with Wind Curtailment Price Calculation. Also provided was a State Department of Labor and Industries Letter dated April 25, 2012 and Certification of Apprentice Labor Standard dated April 19, 2012. Additional supporting documents included WAC 480-109-200 Renewable Portfolio Standard and Karbone Pricing Sheet dated February 26, 2021.

2020 Review

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 2020 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 302-01

2021 Review

Documentation this Generator provided in support of Claimed Bundled RECS and Energy was a Renewable PPA dated August 14, 2008 for a term of 20 years, Energy Price During Term subject to adjustments and information Identifying Performance Assurance Amounts. Also provided were the following: An Electric Service Agreement dated April 15, 2011, First Amendment to Electric Service Agreement effective December 1, 2015, and Pacific Power Oregon Price Summary in effect as of January 11, 2021.

2020 Review

Supporting documentation provided was a PPA dated August 14, 2008 and an electric service agreement dated April 15, 2011. Additional documentation provided included the First Amendment to Electric Service Agreement dated December 1, 2015, and Oregon price summary in effect as of February 2, 2020.

SUBMITTAL 302-02

2021 Review

This Generator claimed Bundled RECS and Energy and provided a 20-year Renewable PPA dated August 14, 2008, as a Required Document. As was provided in 2020, this Generator provided an 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 Power Price Summary Chart in effect as of January 12, 2021.

2020 Review

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 February 1, 2020.

SUBMITTAL 302-03

2021 Review

This Generator provided a 20-year Renewable PPA dated April 14, 2008, as a Required Document supporting Bundled REC and Energy Cost Claims submitted. A Renewable PPA dated August 14, 2008 for a term of 20 years was provided and additionally, an Electric Service Agreement dated April 15, 2011 and First Amendment effective December 1, 2015. Also included was an Oregon Power Price Summary Chart in effect as of January 12, 2021.

2020 Review

This Generator provided a 20-year Renewable PPA dated April 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 February 1, 2020.

SUBMITTAL 303-01

2021 Review

This Generator claimed Bundled RECS and Energy supported by a Standard Contract Off System PPA for Intermittent Resources dated April 29, 2010 for a term of 20 years. Several other documents were provided, including a local ordinance dated July 6, 2011 authorizing execution of a 15-year agreement for the purchase of environmental attributes in the form of RECs necessary or convenient for meeting the Washington State Energy Independence Act. Additionally, a Master Renewable Energy Certificate Purchase and Sale Agreement dated September 21, 2010 was provided.

2020 Review

The uploaded required documentation included with this Submission was an executed Standard Contract Off System PPA for a term of 20 years, for Intermittent Resources effective April 29, 2010, with highlighted text, “[a]ll energy shall be prescheduled according to customary WECC scheduling practices.” Also included was a local 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. Additionally, a Master Renewable Energy Certificate Purchase and Sale Agreement dated September 21, 2010 was provided.

SUBMITTAL 305-01

2021 Review

This Generator claimed Bundled RECS and Energy supported by a Standard Renewable Off-System Variable PPA dated January 15, 2016 for a term of 20 years. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility’s output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated January 25, 2016 for a 20-year Term. Cost calculations were provided for years 2015-2040. This met the requirements of Attachment P Section 3.c.ii, with respect to contracts for the sale of all or part of a facility’s output executed after March 6, 2012.

SUBMITTAL 305-02

2021 Review

This Generator claimed Bundled RECS and Energy supported by a Standard Renewable Off-System Variable PPA dated January 27, 2016 for a term of 20 years. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This met the

requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated June 27, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years 2015-2040. This met the requirements of Attachment P, Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 305-03

2021 Review

This Generator claimed Bundled RECS and Energy supported by a Standard Renewable Off-System Variable PPA dated April 27, 2016 for a term of 16 years, that Includes Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

The Generator provided a PPA dated April 27, 2016 for a 16-year Term. Cost calculations were provided for years 2015-2040. This met the requirements of Attachment P Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 305-04

2021 Review

This Generator claimed Bundled RECS and Energy in its Submittal and provided documentation in the form of a Standard Renewable Off-System Variable PPA dated June 26, 2016 for a term of 20 years. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated June 26, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years 2015-2040. This met the requirements of Attachment P, Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 306-01

2021 Review

This Generator claimed Bundled RECs and Energy Costs. Supporting documents were provided as follows: Copy of emails dated October 30, 2020 regarding Oversupply Management Displacement Costs with information on grossed-up tax liability; copy of emails dated October 30, 2020 regarding REC Value explanation of exposure to OMP/ additional REC Values added to present PTCs. Generator provided a copy of Testimony before the OPUC dated March 30, 2020 regarding Renewable Resource Automatic Adjustment Clause – REC values and proposed adjustments and OPUC Order dated September 29, 2020 regarding same. Documentation was also provided in the form of Emails dated March 3, 2021 verifying no changes to numbers as listed previously, with a Cost Explanation included. These were the same emails as provided in previous supporting documents uploaded in the 2020 Program Year.

2020 Review⁶

This Generator claimed Unbundled Contract RECs and PTC supported by a Letter dated October 1, 2020 regarding Oversupply Management 2020 Displacement costs and calculation methodology of the total Displacement Costs. Also provided was a Follow-up letter regarding REC Values; Testimony dated March 30, 2020 regarding costs; and OPUC Order dated September 29, 2020. Generator has PTC plus regulatory agreement for set REC costs with OPUC.

SUBMITTAL 308-01

Generator claimed zero (0) costs.

SUBMITTAL 308-02

Generator claimed zero (0) costs.

SUBMITTAL 309-01

2021 Review

A PPA dated November 7, 2011 for a 20-year Term, a Pricing Schedule for all contract years and a Pricing breakdown was provided to support Bundled RECs and Energy claims in this Submittal. Also provided was a Price Schedule starting on the completion date, October 1, 2002 per contract year from 2002 through 2022. The IE reached out to confirm the contract end date of November 2002. Excel pricing charts additional supported claimed costs.

⁶ This Review was not included in the IE's 2020 Validation Report, as this Generator completed its Submittal Form in November 2020, late into the 2020-21 Program year.

2020 Review

A PPA dated November 7, 2011 for a 20-year Term, a Pricing Schedule for all contract years 2002-2021 and a Pricing breakdown 2020 was provided to support this Submittal. Prior to the random selection of this Submittal for IE Validation, BPA had indicated to the IE it noted some substantial price changes in comparing the April 2020 LLH and HLH (\$/MWh) numbers to the respective April 2019 numbers. The IE reached out via the Message Board asking for verification that the submitted prices were correct, along with an explanation to support the cost change from 2019 to those claimed in 2020. The Generator provided additional information explaining the variance to the satisfaction of BPA and the IE.

SUBMITTAL 310-02

2021 Review

Bundled RECs and Energy claims by this Generator were documented by a Standard Renewable Off-system Variable Power Purchase Agreement dated August 26, 2016 for a term of 20 years. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

A Karbone Renewables Brokerage Statement dated May 10, 2020 was provided for pricing. Additional documentation has been requested, and it is the IE's belief this was an oversight by this Generator, as information on its other multiple Submittals was complete.⁷

SUBMITTAL 310-03

2021 Review

Bundled RECs and Energy claims by this Generator were documented by a Standard Renewable Off-system Variable Power Purchase Agreement dated April 29, 2016 for a term of 20 years. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years

⁷ Report of the Independent Evaluator 2020 – Additional documentation was provided to the IE after completion of the IE Validation Report.

2015-2040. This met the requirements of Attachment P, Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 310-04

2021 Review

Bundled RECs and Energy claims by this Generator were documented by a Standard Renewable Off-system Variable Power Purchase Agreement dated August 26, 2016 for a term of 20 years. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years 2015-2040. This met the requirements of Attachment P, Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 310-05

2021 Review

Bundled RECs and Energy Standard Renewable Off-system Variable PPA between Suntex Solar, LLC and Portland General dated 5/16/2016 for a term of 16 years; includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This met the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

2020 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated May 16, 2016, for a 16-year Term was provided. Cost calculations were additionally provided for years 2015-2040. This met the requirements of Attachment P Section 3.c.ii, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 311-01

2021 Review

This Generator claimed Unbundled RECs supported by a PPA dated June 24, 2009 for a term of 20 years. Additional Supporting Documentation was a "Cost of Displacement Methodology" showing 2021 Cost of Displacement calculation.

2020 Review

A PPA dated June 24, 2009 for a 20-year term was provided to support this Submittal.

Additionally, supporting documentation for displacement cost methodology was provided.

SUBMITTAL 312-01

2021 Review

Bundled RECs and Energy Cost Claims by this Generator are supported by a PPA dated November 20, 2000 for a term of 25 years that includes Contract Rate and Excel Output Contract Rate Schedule with detailed pricing for contract years. Also provided was a First Amendment of PPA dated September 21, 2001.

2020 Review

Supporting documentation was a PPA dated November 30, 2000 for a 25-year term. Included in the PPA are several tables showing contract year amounts.

SUBMITTAL 312-02

2021 Review

This Generator claimed Bundled RECs and Energy. Support documentation of claims is 30-year term PPA dated November 27, 1996 was provided, the commencement of Commercial Operation of 1999. Included in the PPA is the Schedule of Integration of Resources and Monthly Charge Rate Details.

2020 Review

A 30-year term PPA dated November 27, 1996 was provided, with the commencement of Commercial Operation date of 1999.

SUBMITTAL 313-01

2021 Review

This Generator provided a completed IE Validation Form Template used in past Program years and updated for the current 2021 Program Period to show total Displacement Cost. In the 2021 Program year Submittal, the 2021 IE Validation of Displacement Cost Form refers to PPA prices for Bundled RECs and Energy dated May 28, 2001. The IE requested that the PPA be provided for Validation of Contract Term and Costs. The Generator promptly provided a copy of the 20-year PPA as requested, with detailed pricing and delivery information for bundled energy and RECs pursuant to the agreement.

2020 Review

This Generator provided a Power Purchase and Sale Agreement and Master Power Purchase Agreement dated May 28, 2008 for a 20-year term with attachments. The Master PPA provided detailed pricing and delivery information for bundled energy and RECs pursuant to the agreement.

SUBMITTAL 314-01

2021 Review

This Generator provided a completed IE Validation Form Template used in past Program years and updated for the current 2021 Program Period to show total Displacement Cost. In the 2021 Program year Submittal, the 2021 IE Validation of Displacement Cost Form refers to PPA prices for Bundled RECs and Energy. The IE requested that the Generator provide the PPA for Validation. Generator promptly provided a Renewable Resource PPA dated August 26, 2008 for a 20-year Term.

2020 Review

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. Additionally, PPA pricing for bundled energy and RECs and contract prices were provided.

SUBMITTAL 315-04

2021 Review

This Generator provided the exact same support documentation as was provided in 2020; a Purchase and Sales of Energy and Renewable Energy Certificate Confirmation dated September 10, 2018 pursuant to the terms of the Master Service of the same date. The Certificate of confirmation links to the original PPA dated September 23, 2011, with a term from January 1, 2019 to August 13, 2024. Additionally, they provided a completed IE Validation Form Template used in past Program years and updated for the current 2021 Program Period to show total Displacement Cost. In the 2021 Program year Submittal, the 2021 IE Validation of Displacement Cost Form refers to PPA prices for RECs and Energy. The PPA was provided.

2020 Review

This Generator provided a Purchase and Sales of Energy and Renewable Energy Certificate Confirmation dated September 10, 2018 pursuant to the terms of the Master Service of the same date. The Certificate of confirmation links to the original PPA dated September 23, 2011, with a term from January 1, 2019 to August 13, 2024. Additionally, they provided a completed IE Validation Form Template used in past Program years and updated for the current 2020 Program Period to show total Displacement Cost. In the 2020 Program year Submittal, the 2020 IE Validation of Displacement Cost Form refers to PPA prices for RECs and Energy. The PPA was provided.

SUBMITTAL 317-01

2021 Review

After the initial review of the documentation provided with the Submittal Form, the IE requested additional supporting data for verification of Contract Term. Originally provided page A-1 of a PPA for Bundled RECs and Energy dated July 28, 2008, showing a Payment Schedule only. Generator provided additional section of the PPA showing Article II Effective Date, Term and Early Termination and verification of a 15-year Term.

2020 Review

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.

SUBMITTAL 319-01

2021 Review

This Generator provided verification of claimed costs for Unbundled Contract RECs in an Excel Sheet that showed 2020 REC Prices with Transaction dates from February 27, 2020 to October 27, 2020, (16 Transactions) with Product Type, Contract Volume, Price, Total Cost and Average REC Price. A REC Transaction Confirmation Letter detailed values provided in the Submittal Form along with a Master REC Purchase and Sale Agreement.

2020 Review

This Generator provided a REC Transaction Confirmation Letter detailing values provided in the Submittal Form, along with a Master REC Purchase and Sale Agreement dated August 22, 2019. Terms of the transaction are authorized by a Master Green Tag Purchase and Sale Agreement between Buyer and Seller. An Excel sheet was provided with a chart (dated April 15, 2020) of sales completed in 2019 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 320-01

2021 Review

Five (5) documents supporting claimed Bundled RECs and Energy were provided by this Generator. They are an Energy/REC/GHG/Totals Chart from April 2021 through March 2022; a Resolution of SCPA approving the Annual Budget for the plant dated July 2019 through June 2020; A PPA B dated August 1, 2009 for a 20-year term; and a Karbone Pricing Sheet dated March 12, 2021. Generator also provided a BGC Environmental Brokerage Services Daily REC Bulletin.

2020 Review

Three (3) documents were provided with this Submittal. They were a *Tullett Prebon Pricing Chart* showing Peak and Off-Peak pricing dated March 13, 2020, the Generator's "BGC Environmental Brokerage Services Daily REC Bulletin" and "Karbone Pricing Chart" for the 2020 Program year term.

SUBMITTAL 322-01

2021 Review

This Generator changed ownership on April 6, 2021. Therefore, costs submitted were only valid until that date. Supporting documentation for Bundled RECs and Energy was provided in the form of a REC Purchase Agreement referencing a PPA dated March 15, 1994 with Contract Quantity and Pricing defined along with calculation of REC Product Price. The Index page to PPA included Contract Purchase Price redacted except 2021. Additionally provided was a Karbone pricing chart dated February 26, 2021.

2020 Review

The Required Document provided was an Excel Sheet with Contract Energy Price and Contract REC Prices for the period April 1, 2020 to March 1, 2021. The Index page to PPA included Contract Purchase Price redacted except for 2020 and 2021. Additional documentation was provided as follows: Renewable Energy Credit Purchase Agreement per original date May 15, 1994; a Renewable Energy Credit Purchase Agreement from April 2018 to April 1, 2019; ICAP National Greene-e Bid/Offer chart and Karbone Bid/Ask Pricing Chart, both dated February 28, 2020. The IE found there was enough documentation to support the claimed costs as provided on the Submittal Form.

SUBMITTAL 323-01

2021 Review

This Generator provided several documents supporting their Submittal data. Documentation provided included a Bundled RECs and Energy Memo from CEO dated March 15, 2021 regarding Energy Value Review and a detailed Chart showing Supporting Pricing claimed on the Submittal Form. Also included is a Memo from CEO addressing their Oversupply Management Submittal explaining Biomass and additional fees incurred. Supplemental documents are an Offsite Fuel Storage Costs chart and Site Map. A Renewable PPA dated February 25, 2010 for a term of 15 years additional supports this Submittal, along with an WSPP Agreement Schedule R regarding Firm Bundled REC Confirmation dated December 4, 2020. This Agreement is governed by the WSPP Agreement effective as of July 28, 2020 as modified by Special Provisions amending the WSPP Agreement between purchaser and seller dated as of December 2, 2003, and service schedule R to the WSPP Agreement as filed with FERC on February 22, 2012.

2020 Review

Supporting Documentation for this Submittal included a Memo dated March 16, 2020, with Energy Value Reviews; the Submittal for the current Program year with 2020-2021 Support Pricing; a chart with PPA Pricing with Annual CPI Adjustments; and additional Memo dated March 16, 2020; a chart showing off-site fuel Storage Costs for 2020-21; Site Maps; a Renewable PPA dated February 25, 2010 for a 15-year Term; and a WSPP Agreement with Firm Bundled REC Confirmation dated December 18, 2019 for January-December 2020.

SUBMITTAL 324-01

2021 Review

This Generator claimed Bundled RECs and Energy and provided a PPA between dated March 24, 2009 for a term of 20 years with sample calculations and supporting data.

2020 Review

The IE requested additional supporting documentation because the document provided was the Submittal Form completed for this Program year. Additionally, an HTML document was provided that was unable to be opened. The Generator requested to use the supporting documentation from its 2019 Submittal: a PPA dated March 24, 2009, with a term of 20 years. The Exhibit B offered Examples of Calculation and Guaranteed Energy Amounts, short-fall amounts, and shortfall liquidated Damages. Generator was informed that they must provide the required supporting documentation even if it has been provided in previous Program years. This was completed.

COMPARISON OF 2020 AND 2021 RESULTS

In 2020, twenty (20) Generators submitted thirty (30) Submittals, of which all Submittals included at least one Required Document. Of the thirty (30) Submittals that included Required Documents, thirteen (13) also included additional Supporting Documents. Two (2) Generators' Submittals claimed zero costs.

In 2021, twenty (20) Generators also completed and submitted thirty (30) Submittal Forms, of which all Submittals included at least one Required Document. Of the thirty (30) Submittals, thirteen (13) also included additional Supporting Documents. As in 2020, this Program year the same two (2) Generators Submittals claimed zero costs.

VI. CONCLUSIONS

As discussed previously in this report, the IE performed a review of all 2021 Submissions along with comparisons to 2020 Submissions to confirm consistence in pricing and documentation. The information and claims were consistent in both Program years, with additional supporting documents requested and provided by some Generators to clarify information provided via

Submittals and/or supporting documentation provided. As 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 2021. 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 if needed for reference.

As part of the Submission process, each Generator is required to provide supporting documentation of their choosing. After reviewing the documents uploaded with the thirty (30) Submissions, the IE found the need to request additional documentation and/or clarifications from eight (8) Generators because the initial submissions were insufficient for the IE to complete the Validation Process. All Generators were forthcoming and responded promptly and the IE determined that all Submissions had sufficient documentation to enable the IE to affirm the Submissions.

The IE feels that providing additional guidelines or suggestions for supporting documentation to Generators in order to assist them in establishing the value of loss in the event of Curtailment, may be a useful addition to the Submittal process. Specifically, new participants and Generator management changes may welcome access to additional guidance to determine how best to provide supporting data and documentation for their specific category for displacement costs. This would make the initial review process more efficient and further refine information proffered by Generators from year to year. The IE anticipates working closely in coordination with BPA in order to identify and refine what information and/or documents may be included for this purpose, while still giving Generators flexibility to determine their costs.

The IE will continue to coordinate with Bonneville regarding changes in Generators and contacts for managing the Oversupply Program Submittals, including any subsequent requests for data verification. The IE was consistently provided updated information upon request, and responses to 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.