



**TO**  
**THE BONNEVILLE POWER ADMINISTRATION**



**REPORT OF THE INDEPENDENT EVALUATOR**  
**REVIEW AND VALIDATION**  
**2024 OVERSUPPLY MANAGEMENT PROTOCOL FILINGS**

May 29, 2024

(Updated June 16, 2024)

Submitted by:

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**REPORT OF ACCION GROUP, LLC**  
**INDEPENDENT EVALUATOR FOR BONNEVILLE POWER ADMINISTRATION**  
**REVIEW AND VALIDATION OF 2024 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 “OMP Program”). 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 is provided.

Twenty-nine Submissions were initially received this year from twenty (20) Generators. With the exception of those submitted by two (2) Generators who opted out of the Program, claiming zero (0) costs, the IE performed an in-depth review of all submissions for Validation.

Most Generators were familiar with the process due to previous participation in the Program and, 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, were not familiar with the process and needed some assistance.

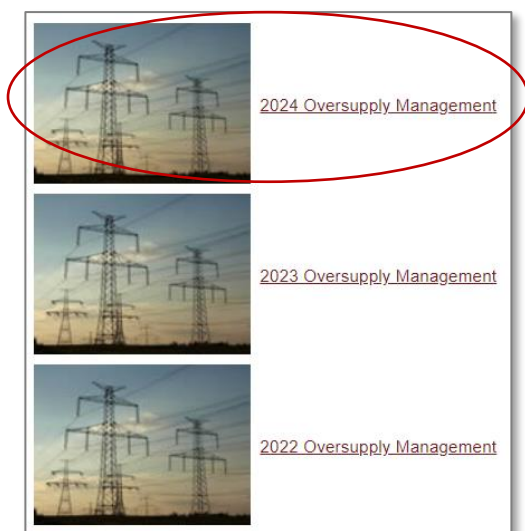
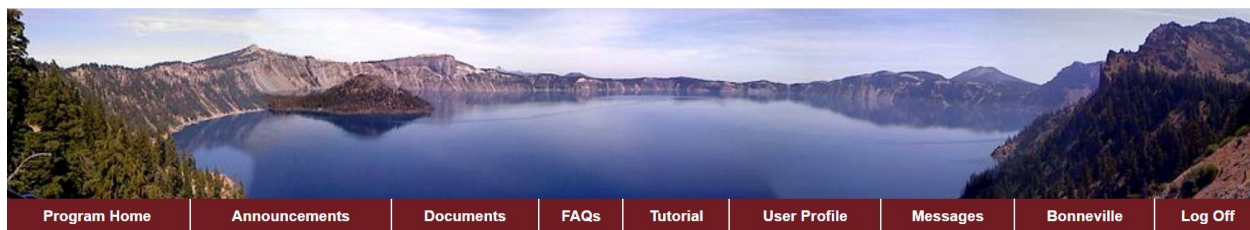
The documentation Generators provide in support of their Submittal is left to the discretion of the individual Generator; however, documentation must be sufficient to verify costs claimed on their Submittal Forms.

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 most instances where a bundled contract was submitted, the contract had an execution date prior to March 6, 2012, as required.<sup>1</sup> During the Validation Process, further review by the IE of supporting documentation provided by all Generators identified some contracts with execution dates after March 6, 2012, for which insufficient information was submitted to support claimed costs. The IE requested additional clarifications from those Generators.

The IE conducted its initial review for all Submissions following the Submittal period deadline. Following the preliminary review and subsequent in-depth review of the initial twenty-nine (29) submissions, the IE found sufficient supporting information from each Generator to confirm the basis for claimed costs for twenty-seven (27) of the submissions<sup>2</sup>. The IE requested additional support documentation or expanded explanations relating to claimed costs from Three (3) Generators. This is discussed further in the Summary Review section of this Report.

## II. 2022 OVERSUPPLY MANAGEMENT PROTOCOL WEBSITE



A new “Silo” was created on the Program Website for the 2024 Oversupply Management Protocol. As with previous Program years, the Website Silo was provided using the previous years’ Website design as a basis 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. 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 remained and still 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 Accion’s Website, available to the individual

<sup>1</sup> Attachment P, Oversupply Management Protocol, Section 3.c.

<sup>2</sup> This IE Report was submitted to BPA on May 29, 2024. Clarifications are still being requested by the IE to validate some displacement claims provided. These instances are noted within the IE Report.

Generator and the IE only. This makes it possible to compare past Generator participation in the Program (2012 through 2023) to the current year's (2024) 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 database for contacting those Generators who had registered in prior years but had not yet registered in the current 2024-2025 Program Year. As part of the annual review, the IE compared prior filings with the 2024 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.

### **A. 2024 PROGRAM LAUNCH**

The 2024 Website was launched on March 1, 2024. The IE identified the list of Generators registered on the 2023 Program Website to determine which Generators should be contacted and invited to register on the Program Website to participate in the 2024 Program. Bonneville also provided the latest Generator contact information.

The following Announcement, provided by Bonneville, was posted on the Announcements Page of the Website, and sent to all Generators registered on the 2024 Website, and additionally to the list of Generators provided by BPA, notifying them to register for the 2024 Program:

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*Bonneville Power Administration, Transmission Services*

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*Requested Action: Submit displacement costs by March 15, 2024*

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*Subject Description:*

*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 to receive compensation per BPA's Oversupply Management Protocol (OMP) adopted as Attachment P of our Tariff in 2012. This action 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 via Tech Forum if there is a risk of implementing the OMP. 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/energy-and-services/transmission/oversupply](http://www.bpa.gov/energy-and-services/transmission/oversupply).*

*Questions about BPA Oversupply Management Protocol may be directed to [techforum@bpa.gov](mailto:techforum@bpa.gov) with "Oversupply" or "OMP" in the subject heading.*

*As of Friday, March 1, 2024, generators can start registering on the Accion site for 2024 cost submittals at <https://oversupply.accionpower.com>. Per Attachment P, Oversupply Management Protocol, generators must self-certify and submit their facility's displacement costs by March 15,*

2024, 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 stated in the Oversupply Management Protocol Business Practice Section C Establishing Minimum Generation Levels and Maximum Ramp Rates, Generator operators and owners also should update their minimum generation levels in the Customer Data Entry system.

The week of March 11th, 2024, BPA will conduct a test of its Oversupply Management functionality in advance of conditions where the tool may be needed. BPA does not anticipate actual displacement below schedules of generating resources operating in its Balancing Authority Area.

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

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To submit comments and questions or unsubscribe, email [techforum@bpa.gov](mailto:techforum@bpa.gov). Click here to subscribe.

## **B. REGISTRANTS AND SUBMITTALS ON THE 2023 WEBSITE**

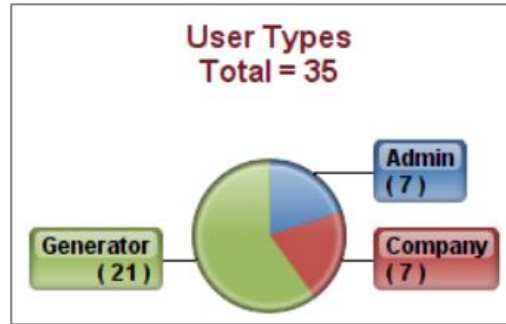
The IE reviewed the 2024 Generators that had registered to participate in the 2024 Program and compared the current year participants to those Generators that had participated in the 2023 Program but were not registered on the 2024 Website. For those that had not registered, the IE contacted them using registration data from the 2023 Website to verify if they were aware of registrations. Initially an email was sent, and if unresponsive, each Generator was contacted by telephone. As noted, the IE reached out to BPA to confirm any changes in Plants and/or Generators that might affect the accuracy of the contracts.

Thirty-five (35) individuals registered on the 2024 Website. They registered 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.

<b><u>Total Registrants:</u></b>	<b>35</b>
Generators Registered:	21 <sup>3</sup>
BPA (Company) Registrants:	7 <sup>4</sup>
Site Administrator Registrants:	7

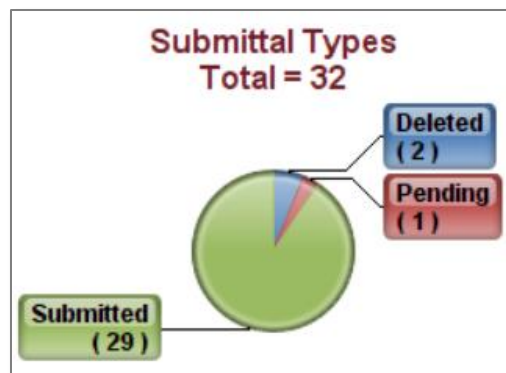
*Figure 1*  
User Types = 35



**Total Submittals: 29**

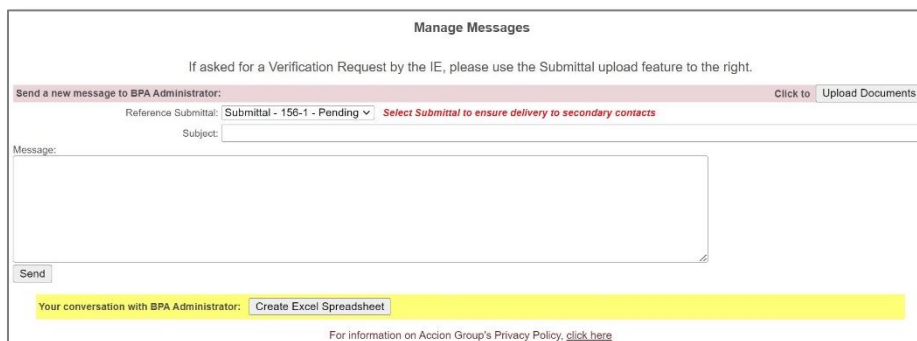
The two (2) deleted Submittals represent Submittals started and subsequently deleted and all were replaced by new Submittals. One (1) Generator left a Submittal pending.<sup>5</sup>

*Figure 2*  
Submittal Types = 37



**C. MESSAGES AND COMMUNICATIONS**

**Communications Between Generators and the IE**



Generators and the IE used the Message Board on the Website to correspond with each other.

<sup>3</sup> Includes one (1) Administrative Test Registration.

<sup>4</sup> Includes one (1) Administrative Test Registration.

<sup>5</sup> In this instance, one (1) Generator started a Submission Form, but left it incomplete. leaving the status showing "pending." A new Submittal was completed.

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. By using the Message Board for all communications, which time and date-stamps them, a permanent record of all conversations is maintained on the Website for future reference.

The IE monitored the Submittals up to and during the days following the Submittal due date of March 15, 2024, to make certain all Generators that wanted to participate had the option to do so, and that Submittals were completed as intended.

As of the date of this Report, two (2) Generators used the Message Board to send their questions or submit additional information regarding their Submittals. The total number of messages originated by these Generators was three (3)<sup>6</sup>, and thirteen (16) 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.

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

Information from Generators was collected on the Program Website. Each Generator was provided with 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, or Off Peak (“LLH”) and Heavy Load Hours or On Peak (“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. One (1) Generator asked for access to their previous year’s Submittals and was directed by the IE as to its accessibility. As part of the annual review, the IE compared prior filings with the 2023 submissions to identify any changes in Generating Facility ownership, etc., and communicated with Bonneville regarding any questions as to Generator changes, if applicable. This comparison and discussions with BPA were beneficial to ensure that the IE had access to the most current and accurate list of Generators, Plants and contact information in order to ensure all eligible Generators had the opportunity to participate had they wished to do so.

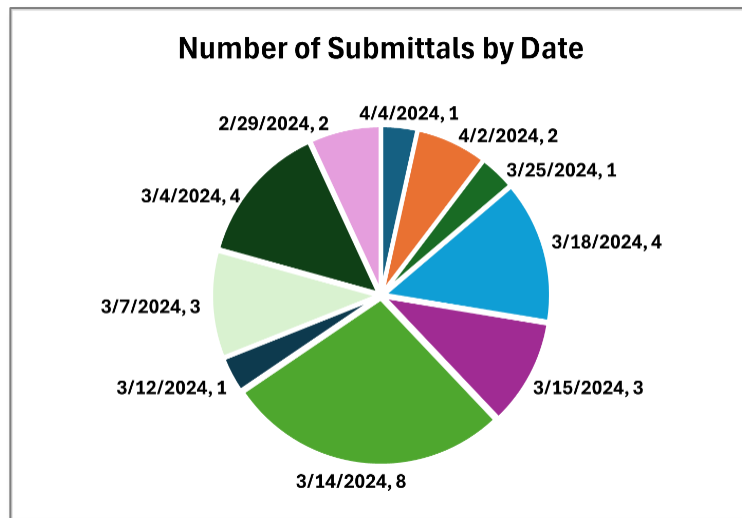
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<sup>6</sup> Messages from Generators represented questions regarding the Oversupply Program and the Submittal process, OMP IE Website use, requests for confirmation of their Submittals, and responses to requests from the IE.



When completing the online Form, Generators were provided the opportunity to revise their statement of costs before submission. Also, Generators were 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. Revising cost data initiates a verification by the IE to confirm the new cost data submitted. 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.

Figure 3



On March 7, 2024, prior to the March 15, 2024, Submittal deadline, an email from the Program 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, reviewed the status of all registrations and Submittals. Two (2) Generators had completed their Submittal Forms but had not completed the submission process. The IE reached out to clarify this was their intent and both Submittals were then submitted.

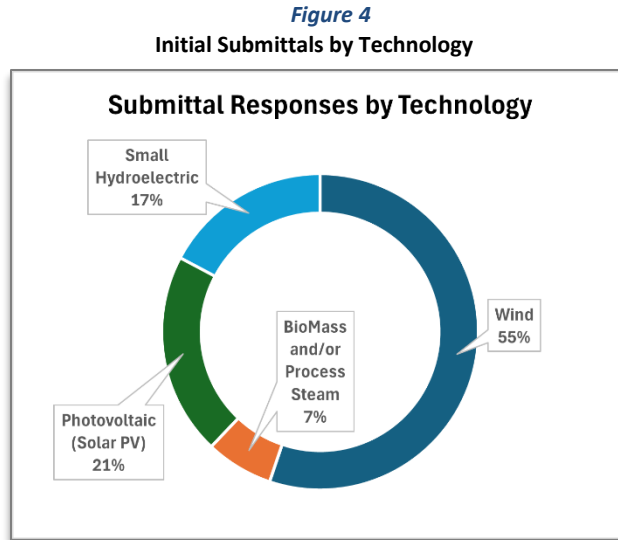
Following the Submittal due date, the IE reviewed the Submittals to confirm and compare responses for all previous program participants, and reached out for confirmation to those Generators that did not register in 2024. This was to confirm they did not wish to participate this program year. Two (2) Generators had not received the initial emails due to changes in management within their companies and were given a window within which to submit their information.

Most Generators provided sufficient information in a timely manner, so the IE could begin review of eligibility.



## SUBMITTAL RESPONSES

Twenty (20) Generators submitted an initial twenty-nine (29) Submittal Forms as shown in the *Initial Submittal Responses by Technology* chart in **Figure 4**.



As part of the Submittal process, 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. Most Generators provided additional supporting documentation. A summary regarding the number of Required and Supporting Documents provided by Generators for each Submittal is shown in **Table 1** of this Report, which appears in the following pages.

## IV. VALIDATION PROCESS

All completed Submittal Forms and their respective Required and/or Supporting Documents were reviewed by the IE to determine if the supporting documentation Generators 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 individually 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. The IEs review of all supporting documentation submitted by Generators shows that the most provide consistent information from year to year, as their claims are supported by PPAs with terms of 15, 20, 25 or 30 years.

In all cases but the few previously noted, the IE found the information provided and reviewed is sufficient to complete Validation because the Supporting Documents identified the claimed displacement value. The Validation of claimed costs permits Bonneville to have confidence that the costs claimed by Generators are accurate.

**V. REVIEW OF 2024-2025 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 is 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.

**A. 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 three (3) Generators identified as needing to provide additional information regarding their Submittals. As of the date of this Report, sufficient information has not been provided to cure the deficiencies as requested.

**Table 1** is a summary of the initial review of the documents provided with each of the twenty-nine (29) 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 Validation.

*Table 1*  
**Summary of Validation Review by Independent Evaluator**

Submittal No.	Required Document Provided	Supporting Documents Provided
501-01	1	1
501-02	1	1
503-01	Claimed 0 Costs	
503-02	Claimed 0 Costs	
504-01	1	1
506-01	1	2
508-01	1	1
508-02	1	
508-04	1	
508-05	1	
509-01	1	1
509-02	1	3
509-03	1	2

Submittal No.	Required Document Provided	Supporting Documents Provided
511-01	1	
513-01	1	
514-01	1	1
514-02	1	1
514-03	1	1
514-04	1	1
515-01	1	
515-02	1	
516-01	1	
517-01	1	1
518-01	1	1
519-01	1	1
520-02	1	
523-01	1	4
524-01	1	1
525-01	1	1

*\* Submittal for which additional information was requested and received by the IE for Validation.*

*\* Submittals for which additional information was requested by the IE for Validation, but not provided by the date of this report.*

## B. SUMMARY REVIEW

The following provides a review of the 2024 Submittals (2024 Review). The IE also reviewed the corresponding 2023 Submittals for comparison and consistency of data provided by Generators for Validation.

The IE found there is sufficient documentation to support the claimed costs as provided on Submittal Forms as noted in the reviews. If a Generator is asked to provide additional information, the original Submittal data is retained on the Website.

For all but four (4) Submittals, the IE found the information provided and reviewed is sufficient to complete Validation because the Supporting Documents identified the claimed displacement values.

### **SUBMITTAL 501-01**

#### 2024 Review

This Generator claimed Unbundled RECS in their Submittal. The required documentation supporting this Submission is in the form of the following: a Karbone Pricing Data Chart dated February 24, 2023, and explanation of Pricing Methodology: Wind Curtailment Price Calculation and several Portfolio Volumes charts. Generator noted in their documentation, the REC value is the value of the Pacific Northwest WA compliant Green-e Eligible REC. Additionally, documentation in the form of WAC 480-109-200 Renewable Portfolio Standard is included explaining eligibility and target years. Documentation in the form of a Master and Maintenance Agreement dated August 2, 2010, is also provided. The IE reviewed the 2022 Submittal

Documentation in order to compare with the 2023 Submittal and supporting information, which is found to be consistent in both Program Years.

**SUBMITTAL 501-02**

2024 Review

This Generator claimed Unbundled RECs. The required documentation supporting this Submission is in the form of the following: a Karbone Pricing Data Chart dated February 24, 2024, and explanation of Pricing Methodology. Generator also 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 is included explaining eligibility and target years. Pricing Methodology is provided in the form of an Excel Chart showing Wind Curtailment Price Calculation – 2022 WA RPS REC Price, Green-e REC Price, Apprenticeship Credit Multiplier and Net REC Value.

**SUBMITTAL 503-01**

2024 Review

The Generator claimed zero (0) costs.

**SUBMITTAL 503-02**

2024 Review

The Generator claimed zero (0) costs.

**SUBMITTAL 504-01**

2024 Review

The uploaded required documentation included with this Submission is 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 (Fixed Price as shown)”.

Also included is a Legislative Ordinance passed on July 11, 2011, and approved on July 18, 2011, authorizing execution of a 15-year agreement for the term authorizing purchase of environmental attributes in the form of RECs necessary or convenient for meeting the Washington State Energy Independence Act. A Master Renewable Energy Certificate Purchase and Sale Agreement dated September 21, 2010, is also provided.

**SUBMITTAL 506-01**

2024 Review

This Generator claimed Unbundled RECs supported by a PPA dated June 24, 2009, for a

20-year term to support this Submittal. Supporting documentation for displacement cost methodology is provided showing 2024 Cost of displacement calculation (Energy, RECs and PTCs). The IE is able to confirm costs claimed.

#### **SUBMITTAL 508-01**

##### **2024 Review**

Bundled RECs and Energy Cost Claims by this Generator are supported by documentation of a PPA dated November 30, 2000, for a 25-year term and First Amendment dated September 21, 2001. Included in the PPA are several tables showing contract year amounts. The pricing charts include the Contract Rate and an Excel of the Output Contract Rate Schedule with pricing. Also provided is a PPA (Fifth Amendment) dated February 1, 2016. The IE is able to validate the costs claimed by this Generator.

#### **SUBMITTAL 508-02**

##### **2024 Review**

This Generator claimed Bundled RECs and Energy. Supporting documentation includes an Amended and Restated PPA dated November 27, 1996, for a 30-year term, with the commencement of Commercial Operation date of 1999. Included is a schedule of Integration of Resources and monthly charge rate details. The IE is able to validate the costs claimed by this Generator.

#### **SUBMITTAL 508-05**

##### **2024 Review**

This Plant came online in April 2022. Documentation provided is a Solar + Storage PPA dated February 11, 2019, with a 30-year Generating System Term, or Solar Term, and 20-year Storage Term. Additionally, a Precedent Transmission Service Agreement dated August 18, 2010, is provided. This Generator claimed Unbundled RECs, supported by a detailed explanation of pricing calculations and methodology, along with a PCC1 Power + REC Chart for 2024 and 2025.

The IE is able to confirm the costs claimed in the Submittal, consistent with 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.

#### **SUBMITTAL 508-04**

##### **2024 Review**

Unbundled RECs claimed by this Generator are supported by the provided Wholesale Renewable PPA dated February 11, 2019, for a 30-year term. Included within the PPA documentation are multiple Exhibits defining generation and output, monthly invoice procedure, and pricing calculation. Additionally supplied as supporting documentation is a

Transfer Agreement regarding a Precedent Transmission Service Agreement dated August 18, 2010. Also supporting this Submittal is a PCC1 Power and REC Chart for 2024 and 2025.

This Generator claimed Unbundled RECs, thus meeting 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. The IE is able to validate the costs claimed by this Generator.

### **SUBMITTAL 509-01**

#### **2024 Review**

In support of Claimed Bundled RECS and Energy, this Generator provided a PPA dated August 14, 2008, for a term of 20 years and an electric service agreement dated April 15, 2011. Other documentation provided includes the First Amendment to Electric Service Agreement dated December 1, 2015, and Oregon price summary in effect as of January 1, 2024. Additional supporting documentation provided with this Submittal are documents provided and reviewed in previous Program Years.

### **SUBMITTAL 509-02**

#### **2024 Review**

This Generator claimed Bundled RECS and Energy and provided a 20-year Renewable PPA dated August 14, 2008, as a Required Document. 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. Additional supporting documentation provided with this Submittal are documents provided and reviewed in previous Program Years.

### **SUBMITTAL 509-03**

#### **2024 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. Also provided are two documents to support Claimed Displacement Costs: 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. Additional supporting documentation provided with this Submittal are documents provided and reviewed in previous Program Years.

### **SUBMITTAL 511-01**

#### **2024 Review**

This Generator provided a Specified Source Transaction Confirmation, governed by an EEI Master Power Purchase and Sales Agreement effective as of April 25, 2000. Schedule I, included, is a Master Power Purchase and Sales Agreement (Trading & Marketing) effective as of February 26, 2024 together with exhibits, schedules and supplements. Fixed monthly pricing information supports those costs claimed as submitted in its Form. Further, IE reached out to this Generator for additional information regarding its contract status. The costs claimed are found to meet 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. The IE is able to confirm the costs claimed in the Submittal.

### **SUBMITTAL 513-01**

#### **2024 Review**

The Generator claimed Bundled Recs and Energy and provided a PPA dated March 24, 2009, with a term of 20 years with supporting data. Exhibit B offers sample calculations and guaranteed energy amounts, short-fall amounts, and shortfall liquidated damages. Generator referenced a specific section in the PPA that provided for the contract pricing, for Energy + RECS. The IE is able to verify costs claimed.

### **SUBMITTAL 514-01**

#### **2024 Review**

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term. Cost calculations are additionally provided for the years 2015-2040 and includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices are taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE is able to verify the costs claimed after reviewing the Submittal data and supporting documentation provided. This meets 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.

### **SUBMITTAL 514-02**

#### **2024 Review**

This Generator provided a Standard Renewable Off-System Variable Power Purchase Agreement dated August 26, 2016, with a 20-year term. The PPA includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing



schedules. The REC prices are taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE is able to verify the costs claimed after reviewing the Submittal data and supporting documentation provided. This meets 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.

### **SUBMITTAL 514-03**

#### **2024 Review**

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term. Cost calculations are additionally provided for the years 2015-2040, with detailed pricing calculations included in Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices are taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE is able to verify the costs claimed after reviewing the Submittal data and supporting documentation provided. This meets 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.

### **SUBMITTAL 514-04**

#### **2024 Review**

This Generator provided a Standard Renewable Off-System Variable PPA dated May 16, 2016, for a 16-year Term. Cost calculations were additionally provided for the years 2015-2040. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices are taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE is able to verify the costs claimed after reviewing the Submittal data and supporting documentation provided. This meets 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.

### **SUBMITTAL 515-01**

#### **2024 Review**

This Generator is new to the OMP Program this year.

The documentation provided for displacement Costs claimed is a Memorandum dated March 14, 2024 referencing an "undefined" contract. Additionally, on this same Memorandum, the tables showing all rates and/or calculations that would allow verification are redacted.

Currently it is impossible to Validate this Generator's claims, and without such information, it is ineligible to participate in BPA's Oversupply Management Program. The IE has

requested additional information, providing the Generator with the opportunity to cure the deficiency.<sup>7</sup>

### **SUBMITTAL 515-02**

#### **2024 Review**

Information regarding this Submittal is the same as provided for Submittal 515-01, above.<sup>8</sup>

### **SUBMITTAL 516-01**

#### **2024 Review**

Documentation provided by this Generator includes a Renewable PPA dated February 25, 2010, for a term of 15 years and a chart with PPA Pricing showing annual CPI Adjustments (2012 to 2024). Two (2) Memos are provided to and from the CEO dated March 14, 2024, regarding Energy Value Review with a detailed Chart supporting the 2024-2025 pricing claimed on the Submittal Form, along with a WSPP Agreement with Firm Bundled REC Confirmation Schedule dated December 2021.

### **SUBMITTAL 517-01**

#### **2024 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, it provided a completed IE Validation Form Template used in past Program years and updated for the current 2024 Program Period to show total displacement Cost. In the 2024 Program year Submittal, the 2024 IE Validation of Displacement Cost Form refers to PPA prices for RECs and Energy. The IE finds sufficient information to confirm costs claimed.

### **SUBMITTAL 518-01**

#### **2024 Review**

In support of its claim for bundled RECs and energy, this Generator provided a Renewable Resource PPA executed on August 26, 2008, for a 20-year term. The PPA includes pricing information. The Generator also provided a 2024 IE Verification Chart used to detail Total Claimed Displacement Costs, also referring to the PPA. Additionally, PPA pricing for bundled energy and RECs and contract prices are provided.

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<sup>7</sup> The IE reached out to this Generator several times via the OMP Website Message Board, with no response.

<sup>8</sup> The IE reached out to this Generator several times via the OMP Website Message Board, with no response.

## **SUBMITTAL 519-01**

### **2024 Review**

This Generator provided a 2024 IE Verification of Displacement Cost Chart detailing Total Claimed Displacement Costs. Additionally provided is a Power Purchase and Sales Agreement and Master Power Purchase Agreement dated May 28, 2008, for a 15-year term with attachments. The Master PPA provides detailed pricing and delivery information for bundled energy and RECs pursuant to the agreement. Also included in the supporting documentation is a P&S of Energy and RECS Confirmation dated September 10, 2018, with Attachment A, Assignment and Assumption Agreement (Service Agreement Point to Point Transmission service dated September 23, 2011, through 2024) and delivery period January 5, 2024 through December 31, 2028. The IE is able to verify costs claimed by this Generator.

## **SUBMITTAL 520-02**

### **2024 Review**

This Generator has claimed PTCs only, however, provided insufficient documentation to validate the Displacement Costs claimed on its Submittal Form. The sole document provided is an Excel sheet showing a curtailment rate determined by three separate rates and a blended rate, which cannot be validated without additional supporting documentation.

At the request of the IE for additional information via the confidential message board on the OMP IE Website, this Generator uploaded its 5-year PPA with an effective date of June 1, 2023, providing explanation for the “Energy Payment Rate” for the term of the Agreement.

With the additional documentation provided, the IE is able to validate compliance with the allowed Claimed Displacement Costs per the guidelines of Attachment P, for contracts executed after March 16, 2012.

## **SUBMITTAL 523-01**

### **2024 Review**

In support of its claim for Bundled RECs and Energy, this Generator provided a PPA dated August 1, 2009, for a term of 20 years. Several additional documents are provided supporting the Submittal. Documentation includes an Amerex Brokers LLC Daily REC Pricing Bulletin, North American REC Markets dated March 13, 2024, and Amerex Carbon Markets Sheet dated March 14, 2024 with relevant dates. An Excel sheet referencing Energy/REC/GHG values total per 2023-2024 Program Year by month is also provided.

## **SUBMITTAL 524-01**

### **2024 Review**

This Generator's previous PPA ended in January, 2024. The current contract, provided as supporting documentation for the 2024-25 Submittal, dated July 31, 2023, claims bundled RECs and Energy, however, only unbundled RECs are eligible to be claimed for contracts signed after March 6, 2012.

The IE reached out to request additional information regarding products and costs claimed, and the Generator was given the opportunity to correct the deficiency. Review is ongoing as of the date of this report.<sup>9</sup>

## **SUBMITTAL 525-01**

### **2024 Review**

To support its claim for Unbundled RECs, this Generator provided a REC Transaction Confirmation email to support values provided in the Submittal Form, confirming 2023 REC sales, and that it is using the same assumptions as previous years: unstructured RECs only.

An Excel sheet is provided with a chart of 2022 REC Prices. The chart represented the 2024 Filing for 2023 Transactions dated November 4, 2022 to September 29, 2023, by structured and unstructured type, resulting in an average price per REC.

## **C. COMPARISON OF 2023 AND 2024 RESULTS**

**In 2023**, eighteen (18) Generators submitted an initial thirty-one (31) Submittals. All Generators included with their Submittals one (1) Required Document in support of their claimed costs and one (1) additional Supporting Document. Of the thirty-one (31) Submittals, eight (8) also included additional Supporting Documents.

The IE's initial review identified one (1) Generator representing four (4) Submittals that did not satisfy the requirements of Attachment P. Given the opportunity to edit its product and re-submit its calculated Displacement Costs, it subsequently opted to not participate and withdrew its Submittals, with twenty-seven (27) Submittals remaining in the 2023-2024 Program Year.

Two (2) Generators' Submittals claimed zero costs in 2023, consistent with 2022 and previous Program Years.

**In 2024**, Twenty (20 ) Generators submitted an initial twenty-nine (29) Submittals. All Generators included with their Submittals one (1) Required Document in support of their claimed

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<sup>9</sup>Generator re-submitted and provided a Wind Renewable Energy Purchase Agreement dated 7/13/2023 as Supporting documentation. Included was a Contract Price Schedule for 10 years and additionally, the methodology for calculating the Expected energy of the facility. The additional information provided is sufficient for the IE to Validate claimed costs.

costs and most included at least (1) additional Supporting Document. Of the twenty-nine (29) Submittals, ten (10) also included additional Supporting Documents.

The IE's initial review identified three (3) Generators representing four (4) Submittals that did not provide Supporting information sufficient for the IE to Validate costs claimed. All were given the opportunity to provide additional Supporting documentation, however, at the time of producing this report, these Submittal remain pending Validation.

Two (2) Generators' Submittals claimed zero costs in 2024, consistent with 2023 and all previous Program Years.

#### **D. CONCLUSIONS**

The IE performed a review of all 2024 Submissions along with comparisons to 2023 Submissions to confirm consistency 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 2024. This resulted in new participants needing minimal assistance, as compared with 2023, where new Generators had multiple questions regarding the process. With the assistance of BPA, the IE was successful in identifying these changes and reached out to those individuals to assist them with the OMP and Submittal process and 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 initial twenty-nine (29) Submissions, the IE found the need to request additional documentation and/or clarifications for four (4) Submittals from three (3) Generators because the initial submissions were insufficient for the IE to complete the Validation Process. Submittals for all Generators that had been notified by the IE of deficiencies in their Supporting Documentation remain unvalidated, with Validation of claimed Displacement Cost subject to receipt of the requested information and the IE's subsequent review of that additional information. The IE determined that all other Submissions have sufficient documentation to enable the IE to affirm the Submissions.

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 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 is launched, and when starting the review process, improves the initial response rate, thus avoiding the need to have numerous conversations with Generators.