

## IPR Follow Up Question – CGS Workshop

**NW Energy Coalition will submit a full comment letter on the IPR in due course. In response to BPAs request, we are now submitting the question below from the CGS workshop for follow-up: Question for Bonneville, as NWECA has suggested since 2013, in high runoff and low market conditions, CGS generation during non-refueling years likely has a depressive effect on Mid-C and other market prices as well as substantially adding to oversupply conditions. I understand that BPA and ENW recently reached an agreement for reduction in output during conditions beyond what has applied until now under the Oversupply Management Protocol. Please describe this new agreement and whether Bonneville has conducted studies to determine when it is financially prudent to reduce output or shut down CGS**

The ability of BPA to request Columbia Generating Station (CGS) to perform economic dispatch during high water periods and low power price market conditions, has been available since commercial operations. The objective is to integrate CGS's capability with the hydroelectric resources of the FCRPS to achieve efficient and economical operation of the system. Recently, BPA and Energy Northwest made revision to the existing agreement concerning economic dispatch of CGS. The revisions resulted in less advanced notice required for BPA in making a request for CGS to reduce power as well as a reduction in time between requests. This increased flexibility provides BPA more options to evaluate the operational and economic benefits of reducing CGS generation to respond to volatile streamflow, loads and regional market conditions.

Prior to BPA requesting CGS to reduce power, the BPA marketing and short term planning groups makes a determination based on market forecasts and current constraints of the FCRPS during oversupply periods that expose endangered fish to dangerous levels of total dissolved gas (TDG) levels, BPA interconnected generators to OMP curtailments, and BPA to OMP curtailment costs. After the operational, fish, and economic risks and impacts are evaluated and discussed, a request is made by BPA to displace CGS generation.