

## Avista Tech Forum NOS-GI customer comment -Tracy Rolstad

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Avista System Planning believes that the Bonneville Power Administration is presently pursuing the proper course of action in regards to requesting regional input regarding generation dispatch patterns for future network open season studies. We offer the following suggestions for future generation integration studies:

- Study the FCRPS at full output, concurrent with maximum contractual usage of the FCRTS by non-federal generators. Although this generation scenario may be an unusual scenario it is abundantly clear that it can occur. Evidence of this would be generation patterns experienced in the spring of 2011. BPA MUST acknowledge that high wind events can occur during periods of high hydro, and indeed even during high thermal generation dispatch. If the federal system cannot balance generation or provide transmission services under these circumstances then this should be identified in the transmission service request, and the appropriate contractual language should be developed to clearly provide BPA with curtailment rights. BPA should exhibit proper care so that firm transmission contract holders do indeed possess firm rights. Transparency is critical so purchasers of federal transmission services fully understand what sort of product they have purchased. Presently it is quite unclear what rights convey with a BPA firm transmission contract.
- BPA MUST concentrate on the REGIONAL impacts of ALL future network open seasons and generation interconnections. BPA should no longer perform generation integration studies without regional assistance and input. For the foreseeable future BPA will continue to integrate new non-federal generation into the FCRTC...this means that BPA then becomes a net exporter of power in all instances (which actually has been the case since 2001). This clearly has a major impact on those balancing areas (i.e. BA's) that border the BPA balancing area. Fundamentally this means that BPA can no longer state that interconnecting any new generation only affects the BPA system, it demonstrably does not! We suggest that BPA make use of the Columbia Grid forum and perhaps the Northwest Power Pool for discussing all future network open season studies. **Note that BPA should engage the Planning staff of the NW utilities BEFORE any substantial study work begins.**
- As a default point of delivery for new generation (if a POD is not provided as part of the transmission service request) we believe that the California ISO BA is an appropriate sink. Generally speaking most developers wish to gain access to the higher priced CAISO market. Although an imperfect solution, using the CAISO as a sink will proper stress the greater Northwest system (i.e. with maximum generation output of all types). If the California-Oregon Intertie is stressed above its maximum path rating then that should be noted in the various study reports and the appropriate mitigation plans and costs should be provided to the interconnection requester.
- Under no circumstance should BPA re-dispatch any Avista generation for the purposes of a network open season study without first contacting the Avista System Planning directorate. Conversations with Avista's Merchant function do not qualify as input for generation dispatch scenarios. **Avista's Merchant has indicated in the past that if Avista was PAID, i.e. negative prices, then Avista would redispatch generation.** Apparently BPA has a policy in place that prohibits negative power pricing, so prudence indicates that Avista review, in detail, any BPA proposed dispatch patterns associated with future network open season studies. BPA should seek advice from Avista System Planning in this regard.