

March 13, 2019

Submitted via email to: techforum@bpa.gov

Re: Comments of Powerex Corp. on the February 26, 2019 Hourly Firm Evaluation Planning Workshop

Powerex appreciates the opportunity to provide comments on the Hourly Firm Evaluation Straw Plan discussion that was held on February 26, 2019. Powerex continues to evaluate Bonneville's proposed framework of the details for the data elements and reports that Bonneville will make available to meet the analysis described in the TC-20 Settlement.

Powerex also continues to work with the PTP customer group in making every effort to collaborate with Bonneville because monitoring and evaluation will be used to determine if the Hourly Firm status quo should be changed in the TC-22 proceeding per section 2(c) of TC-20 Settlement Agreement.

At this point, Powerex asks Bonneville to ensure that the evaluation of Hourly Firm service is based on comprehensive data and neutral analysis per the TC-20 settlement. Please find below further comments regarding key areas of the overall analysis.

Process

As outlined by other PTP Customers, Powerex agrees and also requests that Bonneville set aside additional time for collaboration because a single round of comments followed by the planned April 11th meeting is insufficient for designing and implementing an Hourly Firm evaluation. Bonneville should consider a new evaluation schedule to develop and reach consensus with customers on a plan and criteria for the evaluation, plus any data needed to support the evaluation.

Data

Powerex appreciates the effort Bonneville has already put towards gathering the necessary data as outlined in the Settlement Agreement in order to properly evaluate Hourly Firm service. Capturing the right data is essential for an impartial, repeatable, and ultimately successful evaluation. Bonneville should expect more comments about data from PTP Customers as the process continues. Powerex offers the following comments on the data in support of the PTP Customers and suggests that Bonneville:

1. Narrow the Hourly Firm analysis and focus on actual curtailment events in order to help identify the magnitude of the problem BPA seeks to address.
2. Identify product usage patterns for both NT and PTP at the time of the curtailments and the associated ATC/AFC at the time of firm curtailments.
3. Provide data associated with planned and unplanned outages, peak load events, and generation contingencies, which should also be correlated with the curtailment events.
4. Provide more granular data, showing multiple real-time time horizons (e.g., T – 2 hours, T – 4 hours, etc), for the buckets associated with the timing of reservations

Evaluation Criteria



Powerex offers preliminary comments on evaluation criteria in support of PTP Customers. We agree that the Hourly Firm evaluation is new territory for Bonneville and customers alike, but it is imperative that Bonneville construct the evaluation goals and criteria early on in the process instead of waiting until the data is gathered. Powerex supports the PTP Customers, by outlining how to evaluate curtailment events objectively, with the following comments. Bonneville should:

- a. Study only the events that required actual curtailments or had flows that were close (within 10 %) to the System Operating Limits.
- b. Eliminate events where a significant derate or outage occurred after the procurement of Hourly Firm and subsequent curtailments are not attributed to Hourly Firm.
- c. Assess the direct impact of Hourly Firm onto NT services by determining the Available Transfer Capability (pre/post the outage or curtailment) and remove those events where Hourly Firm sales were within ATC limits.
- d. Data for each event should be provided in more granular format and detail. The data for each curtailment (or every event close to SOL) should include information such as the product type within each NERC Priority, timing of reservations, TTC (including any changes in the DA and RT Horizons), and ATC.
- e. Conduct the analysis and calculate statistics based on the curtailment events that remain.

Thank you for considering our comments. We look forward to collaboratively working with you on the hourly firm evaluation.

Sincerely,

Raj Hundal
Manager, Market Policy