

12/8/2017

Invenergy Response to BPA Questions For Transmission Business Model/Pro Forma Gap Analysis

Invenergy LLC (Invenergy) offers the following comments to the BPA proposals presented during the 2017 Transmission Business Model/Pro Forma Gap Analysis workshops. Invenergy is an independent power producer that develops, owns, and operates large-scale renewable and other clean energy generation and storage facilities in North America, Latin America, Japan, and Europe. Invenergy develops, owns, and operates facilities located within BPA's footprint. Invenergy reserves the right to comment on related proposals in the future. Invenergy's comments herein and its lack of comment on any particular issue are not intended to preclude further Invenergy comments as BPA's proposals evolve.

General Process Questions

1. Should BPA plan meetings based on availability of proposals or would customers prefer a predictable cadence such as meeting monthly or quarterly? Or should BPA consider a mix of both?

BPA should commit at least to regular quarterly meetings. BPA should also ensure that proposals and associated materials are available at least 48 before each meeting.

2. What format do customers prefer for the upcoming workshops? Do customers prefer meetings at the Rates Hearing Room or Webex-based conference calls? Other alternatives?

Invenergy prefers Webex-based conference calls, with full use of Webex audio and sharing functions.

Available Transmission Capability

1. As BPA develops ATC performance metrics and attempts to calibrate it's assumptions to achieve a more "risk-based" commercial request evaluation process:

At the outset, Invenergy recommends a dedicated separate process, including at least one-day's worth of onsite workshops, where BPA would walk customers through the process of how it currently determines ATC for all flowgates that customers may be interested in, including, but not limited to, the South of Allston flowgate. This workshop should utilize actual powerflow studies and uncertainty margins. These workshops should also include discussion of how Operating Transfer Capability (OTC) and Existing Transmission Commitments (ETC) are actually calculated by BPA staff on those same flowgates. The workshops should also address how ATC base case generation assumptions relate to firm capacity obligations. By providing this information early-on, Invenergy and other customers may be better able to understand the details and implications of BPA's proposed changes and would be in a better position to suggest metrics to measure what BPA seeks to measure.

a. What types of data might you like to see to inform your feedback?

Historical flow data on flowgates including hours of congestion and hourly limits.

Projections of congestion based on future expected flows and limits.

Hourly Firm

1. BPA currently uses long term reservations/requests to plan system expansions. Hourly firm redirects comprise greater than 80% of hourly firm PTP activity. Assuming those redirects change how long term reservations are utilized, what information would you suggest BPA use to plan for system expansions?

Invenergy believes that whether an hourly schedule is firm or non-firm does not affect the actual flows on BPA's transmission system nor does it have any effect on congestions. Thus, we are unsure of the connection between firmness of hourly schedules and the need or projected need for expansions. Because the only difference between firm and non-firm schedules is relative curtailment priority, BPA should clarify why it believes that hourly schedules would affect system expansion. BPA should also clarify why its policy on redirects was changed around 2010 to adopt a contract path approach to redirects of network resources.

Study Process

1. As BPA develops an updated study process, what are the areas that will be of most interest or importance to change?

The certainty with which customers can depend on the timing of study results will be the area of most interest and area of most importance to change.

2. As BPA develops an updated study process, what are the areas that will be of most interest or importance to remain the same?

3. What are your key business needs that you need the updated study process to effectively address?

BPA should establish clear off-ramps from the study process that delineate timing and cost with a higher degree of certainty than exists today. Invenergy does not believe that BPA should remove a customer from the study process if that customer does not accept an offer for partial service when compared to what service was initially requested.