September 18, 2017

Via Email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of Avangrid Renewables on BPA's ATC and Long-Term Study Process Proposals, and Follow-up Comments on BPA's Queue Management Proposal

Avangrid Renewables submits these comments following BPA's August 29, 2017, Transmission Business Model Workshop wherein BPA presented proposals on, *inter alia*, the transmission study process and Available Transmission Capability (ATC). Avangrid Renewables also provides here additional comments on BPA's Queue Management proposal from its July 26, 2017 workshop. Finally, Avangrid Renewables reserves its right to further comment on BPA's NT Scope proposal along with other proposals raised in this proceeding to date.

1. ATC Modifications

To properly manage its transmission schedules and trading needs, customers like Avangrid Renewables need reliable capacity and congestion information from BPA's system. To that end, long-term ATC calculations should accurately incorporate power flows and be clearly posted online for participants. Moreover, BPA should publish timely system heat maps that reflect system congestion, and conduct scenario analysis.

2. Long-Term Study Process

Avangrid Renewables strongly encourages BPA to include and manage planning redispatch as part of its System Impact Study process. BPA's proposal to require each customer to negotiate bilateral deals with inc/dec resources to enable a transmission contract will needlessly encumber this process, hamper price transparency, lead to disparate outcomes, and could adversely impact system reliability. Queued customers should not be able to negotiate one-off deals to facilitate individual contracts. Rather, it would be much more efficient for BPA to identify the incl/dec resources needed to relieve congested flowgates and negotiate on behalf of all customers.

3. Queue Management Follow-up Comments

Many of the options discussed in this workshop's proposals are directly related to the concerns that Avangrid Renewables voiced in its August 10, 2017, comments on BPA's Queue Management reform proposals. Avangrid Renewables is concerned that, amid all these planning reforms and proposals, BPA is missing opportunities to pursue commercial solutions that can be beneficial for both BPA and its customers. For example, there has been little discussion on how broader lessons-learned from the South of Allston

Non-Wires pilot program can be used to alleviate the queue management problem and free-up ATC.

Avangrid Renewables remains particularly interested in BPA's under-discussed "develop more tools than 'build'" proposal to manage its project queue. Non-wires/non-build solutions are some of the most cost-effective and easily-implementable tools at BPA's disposal—and they may well solve BPA's stated queue management problem on their own.

Avangrid Renewables appreciates the ability to comment on this workshop and BPA's ongoing Pro Forma/Industry Standard Gap Analysis.