



Stakeholder Comments Template

Resource Adequacy Enhancements

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **July 30, 2020**.

Submitted by	Organization	Date Submitted
Mark Miller 503 230-4003	Bonneville Power Administration	August 4, 2020

Bonneville Power Administration (Bonneville) appreciates the opportunity to comment on the Resource Adequacy Enhancement Revised Straw Proposal.

Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and other regional entities prior to selling power out of the region.

RA Import Requirements

Source Specification requirements

As an entity interested in marketing System Import RA to California LSEs, Bonneville is in full support of the overall approach to RA Imports as outlined in the fifth strawproposal. Including non-dynamic resource-specific system RA that encompasses single resources, specified portfolio of resources in a single BA and a BAA's pool of resources, will allow entities like Bonneville Power to continue to offer System Import RA products to California LSEs on an economically bid basis, while ensuring RA imports are backed by physical and verifiable capacity that is dependable and reliable.

As a supplier of resource adequacy products, Bonneville markets and coordinates operations of a system of resources (31 Federal dams and one nuclear plant), each with multiple generation units, to meet its non-power requirements and total load obligation (including import RA obligations). Any specific unit outage has no impact on Bonneville's ability to provide firm capacity and energy to fulfill its load

obligations. Bonneville views its system, as well as other similar cascading hydro systems, as far superior to a single generating resource when considering reliability and availability.

RA Import Real-time bidding requirements

Bonneville supports the proposed pre-DAME and post-DAME real-time bidding requirements

Firm Transmission Requirement:

Bonneville supports a firm transmission requirement for import RA resources and believes a source to sink firm transmission requirement is necessary. With the goal of the RA program being reliable and dependable capacity, requiring firm transmission source to sink ensures the best chance of delivery during peak periods. This should remove the need for a non-compliance penalty and all the issues that surround such a penalty.

Within neighboring systems, such as within Bonneville Power's transmission system, there are internal transmission (network) constraints that can and will impact the deliverability of a resource to California that are upstream from the AC or DC Intertie. Many of the transmission flowgates within the Bonneville system are constrained during certain times of high energy transfers to California. It is not unusual that the AC or DC intertie itself may not be in need of curtailment but the upstream network flows may need to be curtailed to protect the grid, internal load service and firm energy deliveries. During a curtailment situation, source to sink firm transmission will be the last transmission schedules to be curtailed.

If source to sink firm transmission is not required, Bonneville supports a non-compliance penalty if delivery is not made under firm transmission service from the source to the CAISO. The penalty would need to be substantial enough to encourage the use of firm transmission if the resource is flowing on a known constrained path at any point. Whether this is a financial penalty or a required forced outage resulting in a reduction of the resources UCAP, Bonneville is indifferent at this point in time.

Additional comments

It is still unclear how the UCAP will be determined for Import RA system resources. This is an important issue for Bonneville and we look forward to further discussion on this specific topic.