

August 28, 2018
Via Email (techforum@bpa.gov)

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

**Re: TC-20 – Comments of Invenenergy LLC on the August 21, 2018 TC-20 Tariff
Customer Workshop**

Invenenergy LLC (“Invenenergy”) offers the following comments regarding the Bonneville Power Administration (“BPA”) proposals presented during the TC-20 Tariff Customer Workshop on August 21, 2018. Invenenergy appreciates BPA’s willingness to receive and address customer and stakeholder input. Invenenergy 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. Invenenergy develops, owns, and operates facilities located within BPA’s footprint. Invenenergy reserves the right to comment on related proposals in the future. Invenenergy’s comments herein and its lack of comment on any particular issue are not intended to preclude further Invenenergy comments as BPA’s proposals evolve. In this comment, Invenenergy will only address BPA’s proposal to eliminate unlimited hourly firm transmission service.

If BPA decides to move forward with its proposal to eliminate unlimited hourly firm service, then it should offer meaningful alternatives to customers seeking transmission service. In its presentation, BPA only offered three alternatives moving forward. At the outset, Invenenergy notes that these three alternatives are not the only alternatives available to BPA. Nevertheless, one of those alternatives was a Shaped Daily product, described as a daily product that “maintains some of the flexibility of BPA’s current hourly firm offering.” This description is lacking in detail, however, this product could meet some of the demand for transmission service on BPA’s system currently served by hourly firm purchases. Allowing sufficient redirection and assignment rights could make a shaped daily product attractive to transmission customers seeking to use BPA’s system on a wholesale basis or to serve load.

In addition, as BPA notes in its description of the change impacts to eliminating unlimited hourly firm service, customers could be expected to use “longer products to secure transmission.” A Long-Term Conditional Firm service could provide the certainty necessary for transmission customers. This certainty could also be provided by Short-Term Conditional Firm service with unencumbered rollover rights. BPA’s decision criteria used to evaluate alternatives to unlimited hourly firm would be satisfied with such a product as it would support reliable system operations (as does existing Conditional Firm Service – Bridge or Reassessment); satisfy statutory and legal obligations; maintain FERC curtailment priority intent; not negatively impact financial health. In addition, Long-Term Conditional Firm would incent customers to secure transmission further in advance, allowing more accurate and robust planning by BPA and stakeholders. However, unlike existing Conditional Firm, this product should not require the identification of network upgrades or any other path towards eventual firm service. Eliminating this requirement would avoid the “bridge to nowhere” that reduces the value of the existing Conditional Firm product. Conditional Firm service, even with certain conditions on curtailment, could also meet the needs of load serving entities and their regulators, who often require generators serving their load to do so with “firm” transmission service.