



TO
THE BONNEVILLE POWER ADMINISTRATION



**REPORT OF THE INDEPENDENT EVALUATOR
REVIEW AND VALIDATION
2022 OVERSUPPLY MANAGEMENT PROTOCOL FILINGS**

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REPORT OF ACCION GROUP, LLC
INDEPENDENT EVALUATOR FOR BONNEVILLE POWER ADMINISTRATION
REVIEW AND VALIDATION OF 2022 FILINGS

I. EXECUTIVE SUMMARY

Accion Group, LLC (“Accion”) was selected by Bonneville Power Administration (“Bonneville” or “BPA”) to serve as Independent Evaluator (“IE”) for the Oversupply Management Protocol Program (“Program” or “OM Program” or “OMP”). Accion created and administers the Website (“Website” or “Program Website”) through which the Program is managed.

The OMP provides compensation to Generators that opt to participate in the Program when their generation is displaced by Federal generation. Bonneville designed the Program to ensure displacement is done on a least-cost basis to ensure that lower-cost Generators are displaced prior to higher-cost Generators. All Generators must submit data in support of their costs in order to receive compensation for displacement. The Program is conducted through the Program Website designed to the specifications identified by Bonneville. The Website provides a Disclosure Form to be completed and submitted by Generators for each generating facility located in Bonneville’s balancing authority area. Following the submittal of the Disclosure Form, the IE verifies that the Generators’ claimed costs are supported. The process used by the IE for Validation (“Validation Process” “Validation” or “Process”) was devised by Bonneville, in coordination with the IE, to provide Bonneville with confidence that claimed costs are fully supported by documentation. The Validation Process provides for the IE to review the submissions of Generators to validate the data that was provided.

Thirty (30) Submissions were initially received this year from seventeen (17) Generators. With the exception of those submitted by Generators who opted out of the Program, claiming zero (0) costs, the IE performed an in-depth review of all submissions for Validation.

Most Generators were familiar with the process due to previous participation in the Program and generally, most provided adequate support documentation to facilitate an efficient Validation Process. As is also the case from year-to-year, there were some new account managers who had not participated in past years, and therefore, were not familiar with the process and needed some assistance.

The documentation Generators provide in support of their Submittal is left to the discretion of the individual Generator; however, documentation must be sufficient to verify costs claimed on their Submittal Forms.

Most Generators provided documentation typical to the industry but unique to the

individual Generator. As an example, in some instances the Generator provided documentation that confirmed some claimed costs or established an obligation to deliver energy for only part of the year. In most instances where a bundled contract was submitted, the contract had an execution date prior to March 6, 2012, as required¹. However, during the validation process, further review of supporting documentation provided by Generators identified ten (10) contracts with execution dates after March 6, 2012, and claimed to be bundled. This was claimed in error as per the prerequisite, above.

The IE conducted its initial review for all Submissions following the Submittal period deadline. Following the initial review, the IE requested additional support documentation or expanded explanations relating to claimed costs from some Generators. As a result of the preliminary review and subsequent in-depth review of the initial thirty (30) submissions, including responses to the IE’s requests for additional information, the IE found enough supporting information from each Generator to confirm the basis for claimed costs for twenty-six of the submissions. This is discussed further in the Summary Review section of this Report.

II. 2022 OVERSUPPLY MANAGEMENT PROTOCOL WEBSITE



A new “Silo” was created on the Program Website for the 2022 Oversupply Management



Protocol. As was with previous Program years, the Website Silo was provided using the previous years’ Website design as a basis to provide a degree of consistency for all participants: Generators, Bonneville personnel, and Website Administrators. The Website was edited to reflect the current Program year and updated to reflect edits and/or improvements as discussed with BPA Administrators. The process remained user-friendly and familiar for returning participants. Information provided on the Website to assist Generators with their Submittals was reviewed and updated as needed. All Silos for previous Program years remained and still remain available on

¹ Attachment P, Oversupply Management Protocol, Section 3.c.

the Website so Generators can access their previous Submittals for historical reference. All data from previous years is maintained and accessible on Accion's Website and is available to the individual Generator and the IE. This makes it possible to compare past Generator participation in the Program (2012 through 2021) to the current year's (2022) registered participants. This feature serves to assist Generators when reviewing past compliance filings should they wish to do so, and also provides the IE with a database for contacting those Generators who had registered in prior years but had not yet registered in 2022. As part of the annual review, the IE compared prior filings with the 2022 submissions to identify any changes in generating facility ownership, etc.

The IE communicated with Bonneville regarding any questions as to Generator changes. Bonneville personnel were responsive to all inquiries from the IE, and in all instances, provided requested information promptly and completely.

A. 2022 PROGRAM LAUNCH

The 2022 Website was launched on March 1, 2022. The IE identified the list of Generators registered on the 2021 Program Website to determine which Generators should be contacted and invited to register on the OMP Website to participate in the 2022 Program.

The following Announcement, provided by Bonneville, was posted on the Announcements Page of the Website, and sent to all Generators registered on the 2021 Website, and additionally to the list of Generators provided by BPA, notifying them to register for the 2022 Program:

***From:** Tech Forum <techforum@bpa.gov>
Sent: Monday, February 14, 2022 2:54 PM
To: Tech Forum <techforum@bpa.gov>
Subject: Annual Request to Submit OMP Displacement Costs by March 15, 2022
Bonneville Power Administration, Transmission Services*

***Requested Action:** Submit displacement costs by March 15, 2022*

Subject Description:

As spring approaches, so do the natural elements that provide the Northwest with abundant energy resources. Each year, generators with eligible displacement costs must submit those costs in March, in order to receive compensation per our Oversupply Management Protocol (OMP) adopted as Attachment P of our Tariff in 2012. This is a Tariff requirement, and not an indication that an OMP event is imminent.

BPA's OMP is a tool that BPA can use at any point in the year to address oversupply issues, but historically those events are most likely to occur during the spring runoff. BPA will, to the best of its ability, give notice if there is a risk of implementing the OMP via Tech Forum notice. Operations information related to hydro, thermal and wind conditions and transmission loading can always be found on the BPA Oversupply website at www.bpa.gov/goto/oversupply.

Questions about BPA Oversupply Management Protocol may be directed to techforum@bpa.gov with Oversupply in the subject heading.

As of Tuesday, March 1, 2022, generators can start registering on the Accion site for 2022 cost submittals at <https://oversupply.accionpower.com>. Per Attachment P, Oversupply Management Protocol, generators must self-certify and submit their facility's displacement costs by March 15, 2022 for inclusion in the Least-Cost Displacement Cost Curve. Updates have been made to the site for submitting displacement costs.

Failure to submit displacement costs for a facility will result in a displacement cost of \$0/MWh for that facility. Additional details on the protocol and guidelines for displacement costs are available in Attachment P and in the [Oversupply Management Protocol Business Practice](#).

As stated in the [Oversupply Management Protocol Business Practice](#) Section C Establishing Minimum Generation Levels and Maximum Ramp Rates, Generator operators and owners also should update their minimum generation levels in the Customer Data Entry system.

For the most up-to-date calendar of events, please visit the [BPA Event Calendar](#).

To submit comments and questions or unsubscribe, email to techforum@bpa.gov. Click [here](#) to subscribe.

B. REGISTRANTS AND SUBMITTALS ON THE 2022 WEBSITE

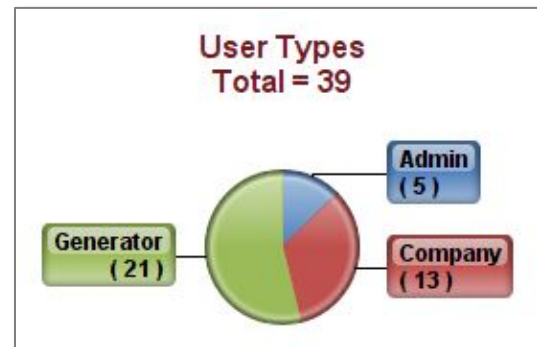
The IE reviewed the 2022 Generators that had registered to participate in the 2022 Program and compared the current year participants to those Generators that had participated in the 2021 Program but were not registered on the 2022 Website. For those that had not registered, the IE contacted them using registration data from the 2021 Website to verify if they were aware of registrations. Initially an email was sent, and if unresponsive, each Generator was contacted by telephone. Additionally, the IE reached out to BPA to confirm any changes in Plants and/or Generators that might affect the accuracy of the contacts.

Thirty-nine (39) individuals registered on the 2022 Website. They registered as Generators, Bonneville personnel or Website Administrators/the IE.

The following charts show the status of both registrations and Submittals as of the date of this Report and are shown in real-time on the Program Website. The charts can be re-formatted based on the user preference for chart type and data displayed.

Total Registrants:	39
Generators Registered:	21 ²
BPA (Company) Registrants:	13 ³
Site Administrator Registrants:	5

Figure 1

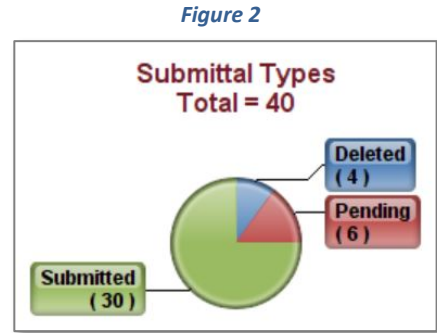


² Includes two (2) Administrative Test Registrations.

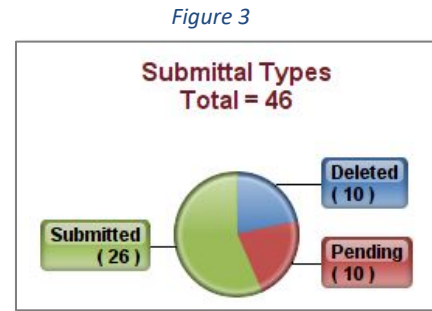
³ Includes one (1) Administrative Test Registration.

Total Submittals: 30

Four (4) Submittals were started and subsequently deleted by three (3) Generators and new Submittals were completed. Six (6) Submittals remained pending, as four (4) were used by the IE for testing purposes and two (2) Generators left a Submittal pending.⁴



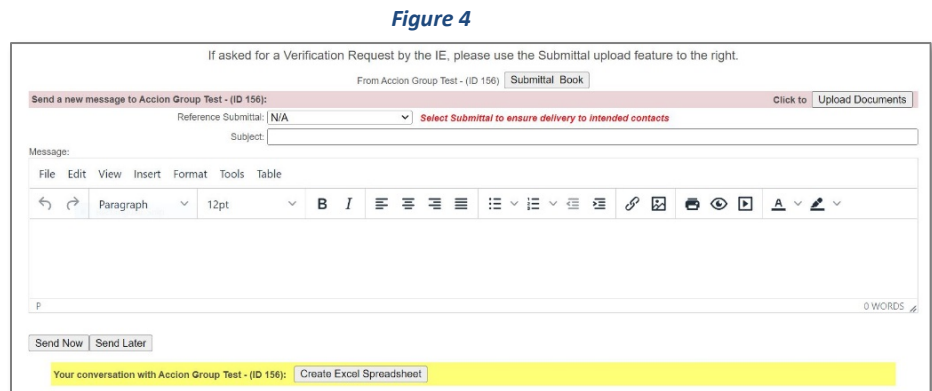
Following final review, three (3) Generators, representing ten (10) Submittals, were not in compliance with Attachment P requirements. All were offered the opportunity to provide corrections and updated pricing when it was apparent their Submittal did not comply with requirements for participation in the OMP Program. Subsequently, one (1) Generator deleted their two (2) previously submitted Forms, and submitted corrected pricing. The second Generator deleted their four (4) Submittals, and created four (4) new Submittals. The third Generator withdrew all four (4) of their previous Submittals and chose not create new ones; all were left pending. Figure 3 shows the final status of Submittals.



C. MESSAGES AND COMMUNICATIONS

Communications Between Generators and the IE

Generators and the IE used the Message Board on the Website to correspond with each other. If Generators had questions or concerns regarding Submittals or the process, they used the Message Board to send a confidential message to the IE, and the IE responded also using the Message Board.



⁴ In this instance, one (1) Generator started a Submission Form, but left it incomplete, as a Submittal Form for the specific Plant had been previously completed and submitted, leaving the status showing “pending.” One new Generator started a submittal and decided not to participate in this program year.

By using the Message Board for all communications, which time and date-stamps them, a permanent record of all conversations is maintained on the Website for future reference.

The IE monitored the Submittals up to and during the few days following the Submittal due date of March 15, 2022 to make certain all Generators that wanted to participate had the option to do so, and that Submittals were completed as intended.

As of the date of this Report, nine (9) Generators used the Message Board to send their questions or submit additional information regarding their Submittals. The total number of messages originated by these Generators was nine (27)⁵, and fifty-three (58) messages were sent by the IE to Generators asking for clarification, confirming Submittals, responding to questions or requesting additional supporting documentation for Validation of Costs represented on Submittals.

The IE identified Six (6) Generators that had not registered to the OMP IE Website, although they either participated in previous program years, or were included on BPA's Generator list as eligible to participate but had not responded to email or telephone inquiries from the IE regarding their intentions to participate in the 2022 OMP Program. Two (2) Generators were new to the Program and ultimately determined to opt out this OMP year, however, indicated they wanted to be notified and would revisit participation next year. One Generator, representing four (4) Plants had not received notification, as their company contact had changed; the four (4) submittals were subsequently completed.

One Generator intended to participate when their new Plant was scheduled to go online in late March.

If Generators responded to telephone inquiries with return calls or direct email responses, the IE transferred the information to the corresponding Message Page, to maintain a record for future regulatory review. The exception was direct communication by email from three (3) Generators that had not registered on the OMP IE Website and notified the IE they did not wish to claim displacement costs.

Communications Between BPA and the IE

BPA Administrators and the IE used the Manager Message Board on the Website to correspond with each other. The Manage Message feature is similar to the Message Board utilized for communications between the IE and Generators, but is solely for communication between BPA and the IE. No other party has access here. If BPA had questions or concerns regarding Submittals or the process, they used the Message Board to send a confidential message to the IE, and the IE responded also using the Manager Message Board (Figure 5).

⁵ Messages from Generators represented questions regarding the Oversupply Program and the Submittal process, OMP IE Website use, requests for confirmation of their submittals, and responses to requests from the IE.

In this manner a permanent record of all conversations is maintained on the Website for future reference.

Figure 5

The screenshot displays a web interface titled "Manger Messages". At the top left, there is a tab labeled "Manager Docs". Below this, a pink header bar contains the text "Send a new message:". The form includes a "Subject:" label followed by a text input field, and a "Message:" label followed by a larger text area. To the right of the message area is a "To:" dropdown menu with a list of recipients: "Barry, Robert", "Tucker, Mark", and "Vincent-Crisp, Sheri". At the bottom of the form, there are two buttons: "Send Now" and "Send Later".

III. SUBMITTAL PROCESS

Information from Generators was collected on the Program Website. Each Generator was provided a confidential, individual Submittal Book with a separate file system for each generating facility identified by the Generator.

Via the Website, on their Submittal Form, each Generator was required to provide monthly cost data for Light Load Hours ("LLH") and Heavy Load Hours ("HLH"). Alternatively, the Generator could decline to claim LLH or HLH by a simple "click" on the Submittal Form, resulting in "0" costs claimed. Generators were also provided the option of claiming Renewable Energy Certificates ("RECs"), or, alternatively, declining to do so.

As previously noted in this report, all the data from previous years' Programs is maintained and accessible (archived) on the Website and available to the individual Generator and the IE. One (1) Generator asked for access to their previous year Submittals and was directed by the IE as to its accessibility. As part of the annual review, the IE compared prior filings with the 2022 submissions to identify any changes in Generating Facility ownership, etc., and communicated with Bonneville regarding any questions as to Generator changes. This comparison and discussion with BPA was beneficial to ensure that the IE had access to the most current and accurate list of Generators, Plants and contact information in order to ensure all eligible Generators had the opportunity to participate had they wished to do so.

When completing the online Form, Generators were provided the opportunity to revise their statement of costs before submission. Also, Generators were permitted to revise cost data on a prospective basis, with the revised cost data being employed two (2) months after the month in which the revision was submitted. Revising cost data initiates a verification by the IE to confirm the

new cost data submitted. As of the date of this report, no Generators submitted revised Submittals. If a Generator submits a revised Submittal(s), once the revised Submittal(s) is eligible, the respective original Submittal(s) would be withdrawn by the IE and replaced by the newly revised Submittal(s) to be included in the Displacement Cost reports or the Pricing Reports generated each month and released on the Website to Bonneville personnel authorized to receive the information.

Three days prior to the March 15, 2022 Submittal deadline an email from the OMP Website was sent to all Generators that had outstanding Submittals, reminding them of the pending due date. The IE monitored the Submittal process, and once the initial Submittal deadline passed, the IE reviewed the status of registrations and Submittals, and noted that six (6) potential participants in the Program had not provided their Submittal Forms, as previously discussed. After follow-up by the IE, those that wished to participate submitted their data within one (1) business day. As was also the case regarding some Submittals in previous Program years the four (4) that remained outstanding were due to Generator Facility ownership changes or changes in the personnel responsible for their Facility’s information. Responses were forthcoming once the individuals responsible for submitting the information received further direction from their facility managers and/or from the IE and became familiar with the process.

Most Generators provided sufficient information in a timely manner, so the IE could begin review of eligibility.

SUBMITTAL RESPONSES

Seventeen (17) Generators submitted an initial thirty (30) Submittal Forms as shown in the *Submittal Responses by Technology* chart in **Figure 6**. Following the IE’s final review, twenty-six (26) submittals could be validated, as shown in **Figure 7**.

Figure 6
Total Submittals

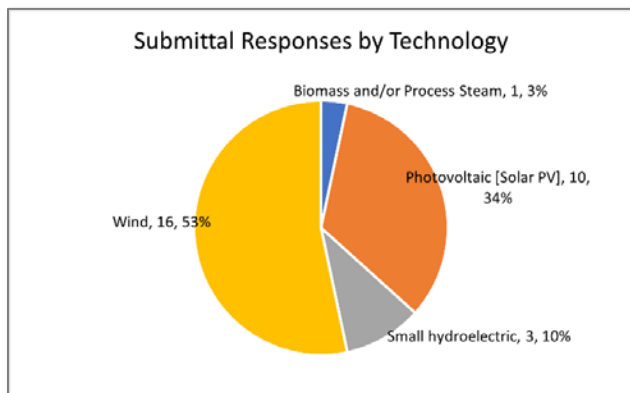
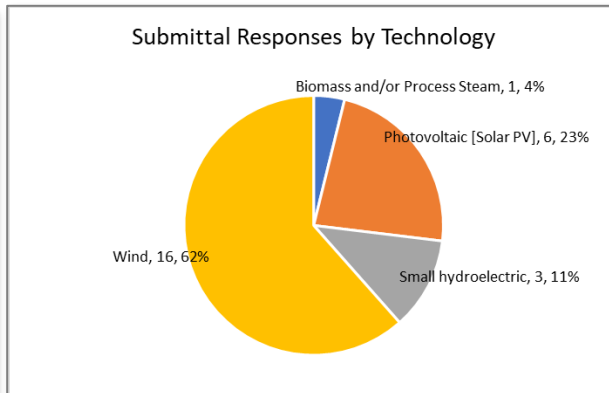


Figure 7
Submittals Validated



As part of the Submittal process, Generators were required to upload documentation supporting the Displacement Cost data included in their Submittal Forms. Most Generators provided

extensive supporting documentation, and all Generators provided at least one document unless they did not claim costs on their Submittal. A summary regarding the quality and number of Required and Supporting Documents provided by Generators for each Submittal is shown in **Table 1** of this Report, which appears in the following pages.

IV. VALIDATION PROCESS

All completed Submittal Forms and their respective Required and/or Supporting Documentation was reviewed by the IE to determine if the supporting documentation Generators provided with their Submittal was sufficient to Validate their claimed costs. If additional supporting information was needed for their claimed costs, the IE reached out to the Generators individually via the Website's confidential Message Board.

The IE notes a consistent number of Generators that provide specific documentation making the Validation Process efficient and accurate. The fact remains that some Generators only make market sales and, therefore, it remains challenging to provide an easy way for that to be reported. At the same time, most Generators have participated in the Program for several years and are therefore more familiar with the documentation required.

In all cases the information ultimately provided and reviewed was sufficient to complete Validation because the Supporting Documents identified the claimed displacement values. The Validation of claimed costs permits Bonneville to have confidence that the costs claimed by Generators are accurate.

V. REVIEW OF 2022-2023 PROGRAM YEAR SUBMITTALS

The goal of this review is to summarize the quality of information provided by all responding Generators, with the IE determining if there was need to seek information from the individual Generators, beyond what was provided by each Generator at the time the Submittal Form was completed. The Program is premised on Generators providing correct data, supported by documentation requested by the IE as part of the Validation Process.

A. INITIAL REVIEW

The IE performed an initial review once all Submissions had been received on the Website, prior to commencing with the in-depth Validation Process. During the initial review, the IE reached out to five (5) Generators identified as needing to provide additional information. All provided sufficient information to cure the deficiencies as requested with no additional information needed. Following this review, it was necessary for the IE to reached out to three (3) additional Generators

to verify the claimed costs, due to discrepancies regarding compliance with Attachment P.⁶

Table 1 is a summary of the initial review of the documents provided with each of the thirty (30) Submittals and also provides insight into the quality and quantity of documentation provided by Generators. This is followed by a description of any instances when the IE reached out to clarify or collect additional information from Generators, and the status of each verification.

Table 1
Summary of Validation Review by Independent Evaluator - April 2022

Submittal No.	Required Document Provided	Supporting Documents Provided
401-1	1	1
402-3	1	
403-2	1	1
404-1	1	1
405-1	Claimed 0 Costs	
405-2	Claimed 0 Costs	
406-2	1	1
406-3	1	1
406-4	1	1
406-5	1	1
407-1	1	
407-2	1	
407-3	1	
407-4	1	
408-1	1	1
408-2	1	2
409-1	1	1
411-1	1	5
411-2	1	5
411-3	1	5
412-1	1	1
414-1	1	
417-1	1	4
418-1	1	
425-2	1	
426-1	1	
431-1	1	
431-2	1	
431-3	1	
431-4	1	

⁶ These Generators' submittals are shown in Table 1, identified by red text (*Submittals 406-02, 03, 04, 05; Submittals 407-03, 04; and Submittals 431-01, 02, 03, 04*).

B. SUMMARY REVIEW

The following provides a review of the 2022 Submittals (*2022 Review*). The IE also reviewed the corresponding 2021 Submittals for comparison and consistency of data provided by Generators for Validation.

The IE found there was sufficient documentation to support the claimed costs as provided on Submittal Forms as noted in the reviews. If a Generator was asked to provide additional information, or in specific circumstances discussed hereto, given the opportunity to create a new Submittal, the original Submittal data was retained on the Website.

SUBMITTAL 401-1

2022 Review

The uploaded required documentation included with this Submission was an executed Standard Contract Off System PPA for a term of 20 years, for Intermittent Resources effective April 29, 2010, with highlighted text, “[a]ll energy shall be prescheduled according to customary WECC scheduling practices (Fixed Price as shown)”.

Also included was a Legislative Ordinance passed on July 11, 2011 and approved on July 18, 2011 authorizing execution of a 15-year agreement for the term authorizing purchase of environmental attributes in the form of RECs necessary or convenient for meeting the Washington State Energy Independence Act. A Master Renewable Energy Certificate Purchase and Sale Agreement dated September 21, 2010 was also provided.

SUBMITTAL 402-03

2022 Review

Documentation provided by this Generator included a Renewable PPA dated February 25, 2010 for a term of 15 years and a chart with PPA Pricing showing annual CPI Adjustments. Two (2) Memos were provided to and from the CEO dated March 15, 2022 regarding Energy Value Review with a detailed Chart supporting the pricing claimed on the Submittal Form, along with a WSPP Agreement with Firm Bundled REC Confirmation Schedule dated December 2021.

SUBMITTAL 403-02

2022 Review

This Generator provided a Purchase and Sales of Energy and Renewable Energy Certificate Confirmation dated September 10, 2018 pursuant to the terms of the Master Service of the same date. The Certificate of confirmation links to the original PPA dated September 23, 2011, with a term from January 1, 2019 to August 13, 2024. Additionally, they provided a completed IE Validation Form Template used in past Program years and updated for the current 2022 Program Period to show total Displacement Cost. In the 2022 Program year Submittal, the 2022 IE

Validation of Displacement Cost Form refers to PPA prices for RECs and Energy. The PPA was provided.

SUBMITTAL 404-01

2022 Review

This Generator provided a 2022 IE Verification of Displacement Cost Chart detailing Total Claimed Displacement Costs. Additionally provided was a Power Purchase and Sales Agreement and Master Power Purchase Agreement dated May 28, 2008 for a 15-year term with attachments. The Master PPA provided detailed pricing and delivery information for bundled energy and RECs pursuant to the agreement. Also included in the supporting documentation was a P&S Energy and RECS Confirmation dated September 10, 2018 with Attachment A, Assignment and Assumption Agreement (Service Agreement Point to Point Transmission service dated September 23, 2011 through 2024).

SUBMITTAL 405-01

Generator claimed zero (0) costs.

SUBMITTAL 405-02

Generator claimed zero (0) costs.

SUBMITTAL 406-02

2022 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated January 25, 2016 for a 20-year Term. Cost calculations were provided for years 2015-2040 in Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed they would not be participating in the 2022 OMP Program.

SUBMITTAL 406-03

2022 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated June 27, 2016, for a 20-year Term. Cost calculations were provided for years 2015-2040 in Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed they would not be participating in the 2022 OMP Program.

SUBMITTAL 406-04

2022 Review

The Generator provided a Standard Contract Off System PPA for Intermittent Resources dated April 27, 2016 for a 16-year Term. Cost calculations were provided for years 2015-2040. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed they would not be participating in the 2022 OMP Program.

SUBMITTAL 406-05

2022 Review

The Generator provided a Standard Contract Off System PPA for Intermittent Resources dated June 26, 2016 for a 20-year Term. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed they would not be participating in the 2022 OMP Program.

SUBMITTAL 407-01

2022 Review

This Generator claimed Bundled RECs and Energy. Supporting documentation includes an Amended and Restated PPA dated November 27, 1996, with the commencement of Commercial Operation date of 1999. Included is a schedule of Integration of Resources and monthly charge rate details.

SUBMITTAL 407-02

2022 Review

Bundled RECs and Energy Cost Claims by this Generator are supported by documentation of a PPA dated November 30, 2000 for a 25-year term. Included in the PPA are several tables showing contract year amounts. The pricing charts include the Contract Rate and an Excel of the

Output Contract Rate Schedule with pricing. Also provided is a PPA (First Amendment) dated September 21, 2001. The documents as originally provided were heavily redacted, however, additional information was requested by the IE and was subsequently provided.

SUBMITTAL 407-03, re-submitted as 407-05

2022 Review

Bundled RECs and Energy Cost Claimed by this Generator are supported by the provided Wholesale Renewable PPA dated February 11, 2019 for a 30-year term. Included with in the PPA documentation are multiple Exhibits defining generation and output, monthly invoice procedure, and pricing calculation. Additionally supplied as supporting documentation is a Transfer Agreement regarding a Precedent Transmission Service Agreement dated August 18, 2010. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed and the Generator was given the opportunity to correct their deficiency, the result of what appeared to be a misunderstanding of Attachment P. The previous Submittal (407-03 was withdrawn/deleted and a new Submittal Form (407-05) was completed. The IE reviewed the new Submittal and the additional supporting documentation, and was able to confirm the costs claimed in the new Submittal.

SUBMITTAL 407-04, re-submitted as 407-06

2022 Review

This Plant came online in April 2022. Documentation provided is a Solar + Storage PPA dated February 11, 2019 with a 30-year Generating System Term ("Solar Term") and 20 year "Storage Term". Additionally, a Precedent Transmission Service Agreement dated August 18, 2010 is provided. This Generator is claiming Bundled RECs and Energy, with claims supported by detailed explanation of pricing calculations and methodology. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed and the Generator was given the opportunity to correct their deficiency, the result of what appeared to be a misunderstanding of Attachment P. The previous Submittal (407-04) was withdrawn/deleted and a new Submittal Form ((407-06) was completed. The IE reviewed the Submittal along with the additional supporting documentation, and was able to confirm the costs claimed in the new Submittal.

SUBMITTAL 408-01

2022 Review

This Generator claimed Unbundled RECS in their Submittal. The required documentation

initially supporting this Submission was in the form of the following: a Karbone Pricing Data Chart dated March 2, 2022 and explanation of Pricing Methodology: Wind Curtailment Price Calculation; Pacific Northwest WA Compliant Green-e Eligible Wind RECs; and several Portfolio Volumes charts. The IE reviewed the 2021 Submittal Documentation in order to compare with the 2022 Submittal and supporting information. Documentation in the form of a Master and Maintenance Agreement dated August 2, 2010 was also provided.

SUBMITTAL 408-02

2022 Review

This Generator claimed Unbundled RECs. The required documentation initially supporting this Submission was in the form of the following: a Karbone Pricing Data Chart dated March 4, 2022 and explanation of Pricing Methodology. Generator also provided a letter dated April 25, 2012 from the Department of Labor and Industries re: Certificate of Apprentice Labor Standard. Documentation in the form of WAC 480-109-200 Renewable portfolio standard was included explaining eligibility and target years. (Pricing Methodology provided: Excel Chart showing Wind Curtailment Price Calculation – 2022 WA RPS REC Price, Green-e REC Price, Apprenticeship Credit Multiplier and Net REC Value)

SUBMITTAL 409-01

2022 Review

This Generator claimed Unbundled RECs supported by a PPA dated June 24, 2009 for a 20-year term was supplied to support this Submittal. Supporting documentation for displacement cost methodology was provided showing 2022 Cost of Displacement calculation.

SUBMITTAL 411-01

2022 Review

In support of Claimed Bundled RECS and Energy, this Generator provided a PPA dated August 14, 2008 for a term of 20 years and an electric service agreement dated April 15, 2011. Other documentation provided included the First Amendment to Electric Service Agreement dated December 1, 2015, and Oregon price summary in effect as of January 1, 2022. Additional documents included are a Membership Certificate for the Columbia Basin Electric Cooperative, Inc., and a Columbia Basin Electric Rates document dated March 14, 2022.

SUBMITTAL 411-02

2022 Review

This Generator claimed Bundled RECS and Energy and provided a 20-year Renewable PPA dated August 14, 2008, as a Required Document. To support claims of loss in the event of curtailment, this Generator provided two documents: The Electric Service Agreement relating

to the Facility and Delivery Service Schedule dated April 15, 2011, with an amended effective date of December 1, 2015, and PUC OR No. 36 – Schedule 47 regarding Large General Service/Delivery Service. Additional documents included are a Membership Certificate for the Columbia Basin Electric Cooperative, Inc., and a Columbia Basin Electric Rates document dated March 14, 2022.

SUBMITTAL 411-03

2022 Review

This Generator provided a 20-year Renewable PPA dated April 14, 2008, as a Required Document supporting Bundled REC and Energy Cost Claims submitted. This Generator provided two documents to support claimed displacement costs: The Electric Service Agreement relating to the Facility and Delivery Service Schedule dated April 15, 2011, with an amended effective date of December 1, 2015, and PUC OR No. 36 – Schedule 47 regarding Large General Service/Delivery Service. Also included was an Oregon Price Summary Chart as of January 1, 2022 and a Membership Certificate to the Columbia Basin Electric Cooperative, Inc. dated May 10, 2012. The final supporting document is a Columbia Basin Electric Rates Sheet dated March 14, 2022.

SUBMITTAL 412-01

2022 Review

In support of its claim for bundled RECs and energy, this Generator provided a Renewable Resource PPA executed on August 26, 2008 for a 20-year term. The PPA included pricing information. The Generator also provided a 2022 IE Verification Chart used to detail Total Claimed Displacement Costs, also referring to the PPA. Additionally, PPA pricing for bundled energy and RECs and contract prices were provided.

SUBMITTAL 414-01

2022 Review

The Generator claimed Bundled RECs and Energy and provided a PPA dated March 24, 2009, with a term of 20 years with supporting data. The Exhibit B offered sample Calculations and Guaranteed Energy Amounts, short-fall amounts, and shortfall liquidated Damages.

SUBMITTAL 417-01

2022 Review

In support of its claim for Bundled RECs and Energy, this Generator provided a PPA dated August 1, 2009 for a term of 20 years. Several additional documents were provided supporting the Submittal. They were a “BGC” Brokerage Service Daily REC Bulletin for Renewables: PJM by state; an Argus Air Daily Environmental Commodity Market Coverage Report dated March 11, 2022; and

an Excel sheet referencing Energy/REC/GHG values total per 2022-2023 Program Year month.

SUBMITTAL 418-01

2022 Review

The required Document provided by the Generator in support of its claim for Bundled RECs and energy was a Power Purchase Agreement dated as of July 28, 2008 for a term of 15 years. Appendix A of the PPA provided an Excess Energy Payment schedule that provided purchase price for Delivered Energy and non-excess Energy delivered.

SUBMITTAL 425-02

2022 Review

To support its claim for Unbundled RECs, this Generator provided a REC Transaction Confirmation Letter detailing values provided in the Submittal Form, along with a Master REC Purchase and Sale Agreement dated August 22, 2019. A Master Green Tag Purchase and Sales Agreement between Buyer and Seller authorized the terms of the transaction. An Excel sheet was provided with a chart of sales completed in 2020 with transaction dated February 27, 2021 to October 14, 2021 by structured and unstructured type. The chart shows Energy/REC/GHG and Karbone Bids and Offers (for Average). Peak and Non-Peak calculations were provided, along with Transaction confirmation.

SUBMITTAL 426-01

2022 Review

To support its claim for Bundled RECs and Energy, this Generator submitted a PPA dated November 7, 2011 for a 20-year Term, a Pricing Schedule for all contract years 2002-2022 and a Pricing breakdown was provided to support this Submittal. During the IE's review, confirmation was sought regarding the end of the term of the PPA, and Generator confirmed this PPA ends October 1, 2022.

SUBMITTAL 431-01, resubmitted as 431-05

2022 Review

This Generator provided a Standard Renewable Off-System Variable Power Purchase Agreement dated August 26, 2016 with 20-year term. The PPA includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed and their understanding of the Oversupply Management Protocols. The Generator was given the opportunity to correct

what they indicated was their misunderstanding of Attachment P and a new Submittal Form was completed.

SUBMITTAL 431-02, resubmitted as 431-06

2022 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years 2015-2040, with detailed pricing calculations included in Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed and their understanding of the Oversupply Management Protocols. The Generator was given the opportunity to correct what they indicated was their misunderstanding of Attachment P. A new Submittal Form was completed and the IE was able to verify the costs claimed after review of the submittal data and supporting documentation provided.

SUBMITTAL 431-03, resubmitted as 431-07

2022 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated May 16, 2016, for a 16-year Term was provided. Cost calculations were additionally provided for years 2015-2040. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed and their understanding of the Oversupply Management Protocols. The Generator was given the opportunity to correct what they indicated was their misunderstanding of Attachment P. A new Submittal Form was completed and the IE was able to verify the costs claimed after review of the submittal data and supporting documentation provided.

SUBMITTAL 431-04, resubmitted as 431-08

2022 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term was provided. Cost calculations were additionally provided for years 2015-2040 and includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional

information regarding product claimed and their understanding of the Oversupply Management Protocols. The Generator was given the opportunity to correct what they indicated was their misunderstanding of Attachment P. A new Submittal Form was completed and the IE was able to verify the costs claimed after review of the submittal data and supporting documentation provided.

C. COMPARISON OF 2021 AND 2022 RESULTS

In 2021, twenty (20) Generators completed and submitted thirty (30) Submittal Forms, of which all Submittals included at least one Required Document along with at least one (1) Supporting Document. Of the thirty (30) Submittals, thirteen (13) also included additional Supporting Documents. Two (2) Generators' Submittals claimed zero costs in 2021.

In 2022 seventeen (17) Generators submitted an initial thirty (30) Submittals. All Generators included with their Submittals one (1) Required Document in support of their claimed costs. Of the thirty (30) Submittals, thirteen (13) also included additional Supporting Documents. Two (2) Generators' Submittals claimed zero costs in 2022, as in 2021. Three (3) Generators ultimately withdrew their initial Submittals and the IE provided the opportunity for them to create new Submittals to correct their misinterpretation of the Oversupply Management Protocols when they originally provided their Submissions. One Generator notified the IE they decided not to participate in the current 2022-23 Program year, and withdrew their four (4) Submittals, leaving twenty-six (26) Submittals.

D. CONCLUSIONS

The IE performed a review of all 2022 Submissions along with comparisons to 2021 Submissions to confirm consistency in pricing and documentation. The information and claims were consistent in both Program years, with additional supporting documents requested and provided by some Generators to clarify information provided via Submittals and/or supporting documentation provided. As in previous years, there were some changes in Generator personnel such that those responsible for managing participation in past Program years were no longer involved in 2022. This resulted in new participants needing assistance with the process. With the assistance of BPA, the IE was successful in identifying these changes and reached out to those individuals to assist them with the OMP and Submittal process and access to their previous OMP Submittals if needed for reference.

As part of the Submission process, each Generator is required to provide supporting documentation of their choosing. After reviewing the documents uploaded with the initial thirty (30) Submissions, the IE found the need to request additional documentation and/or clarifications from five (5) Generators because the initial submissions were insufficient for the IE to complete the Validation Process. All Generators that had been notified of deficiencies in their Submittals or supporting documentation were forthcoming and responded promptly. The IE ultimately determined

that all Submissions had sufficient documentation to enable the IE to affirm the Submissions. One (1) Generator withdrew their four (4) non-conforming Submittals, as previously noted, with the intent to re-submit their corrected pricing and documentation, however, the Generator confirmed via the Website Message Board they could not participate in the OMP Program because their plants did not meet the requirements outlined in Attachment P.

The IE will continue to coordinate with Bonneville regarding changes in Generators and contacts for managing the Oversupply Program Submittals, including any subsequent requests for data verification. The IE was provided updated information upon request, and responses to questions regarding eligibility for participation in the OMP were provided promptly. Having the latest contact information when the new Program Year was launched, and when starting the review process, improves the initial response rate, thus avoiding the need to have numerous conversations with Generators.