

January 8, 2020

**Via Email**

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

**Re: Comments of Avangrid Renewables, LLC on Customer Meetings Addressing Ongoing ATC Methodology Improvements and *De Minimis* Impact Test**

Avangrid Renewables, LLC (“Avangrid”) hereby submits comments to the Bonneville Power Administration (“Bonneville”) concerning the meeting held on November 12, 2019 addressing ATC Methodologies, ATC Base Case, Intertie Studies & TIP Update (the “ATC Workshop”) and the TC-20 Update held on December 12, 2019 (the “December TC-20 Update”) where Bonneville provided information on short term ATC improvements and an update on the ongoing *de minimis* testing issue (the “*De Minimis* Update”). Acknowledging Bonneville’s busy customer engagement schedule, Avangrid asks that Bonneville schedule a follow-up call, meeting, or workshop in the near future to provide the additional information requested in the ATC Workshop and to facilitate additional discussion on these important topics.

**ATC Methodology Improvements**

Several questions were raised by stakeholders during the ATC Workshop that are of interest to Avangrid. Bonneville was not prepared to answer many of these questions and asked stakeholders to submit their questions via Tech Forum to ensure that they were accurately captured and could be sufficiently addressed. Bonneville did not specify if answers would be posted online, disseminated via Tech Forum notice, or if an additional meeting would be scheduled to continue the ATC discussion. At the TC-20 Update, Bonneville provided more information regarding short term ATC improvements and reported that it was working to schedule a follow-up meeting to address the issues raised at the ATC Workshop.

Avangrid is interested in reviewing any additional ATC information provided by Bonneville, and believes additional stakeholder discussion is likely the most efficient way to address the outstanding ATC issues. Bonneville’s ATC calculations are critically important to Avangrid. In the follow-up meeting, Avangrid would like to better understand why ATC was reduced on certain flowgates and how Bonneville plans to move forward with its ATC methodology improvements. Avangrid is also interested in hearing from Bonneville about its strategy regarding the flow gates most severely impacted with the current base case, whether the upgrades currently in progress help the situation, if Bonneville has other plans to relieve the ATC deficit, etc. We hope that additional discussion on these topics will be scheduled expeditiously.

## ***De Minimis* Impact Testing for Network Flowgates**

During the July 24, 2019 Commercial Business Process Improvements (“CBPI”) call, Avangrid became aware of customer feedback regarding issues involving Bonneville’s *de minimis* impact test for transmission service over Network Flowgates (the “*De Minimis* Issue”). During the August 6, 2019 TC-20 Update meeting, Bonneville provided some observations regarding changes to Hourly Firm service that went into effect July 1, *i.e.* limited Hourly Firm, including regarding the *De Minimis* Issue. Bonneville explained that some customers were noticing discrepancies between the way they thought the *de minimis* test worked for short term redirects, based on Bonneville documentation, and the way Bonneville’s software actually worked in practice.<sup>1</sup> Bonneville asked customers to please reach out to their Account Executives if they would like Bonneville to pursue any changes to its practice. Various customer comments have been filed.<sup>2</sup> The *De Minimis* Issue was described again during the ATC Workshop and in the December TC-20 Update Bonneville offered customers the opportunity to provide feedback on its characterization of the issue:

BPA needs to determine if the benefit of a *de minimis* test should be applied to the net impact of redirect requests in the short-term horizon.

Avangrid encourages Bonneville to align its short term *de minimis* testing with posted long term *de minimis* documentation. Short term redirects should not have a more punitive *de minimis* test than short term original requests.

Avangrid appreciates Bonneville’s willingness to engage with customers about its ATC methodologies and the processes that affect them. We believe additional stakeholder engagement will be needed to better understand the information provided by Bonneville and work through ATC issues efficiently. As such, Avangrid urges Bonneville to schedule a follow-up meeting as soon as practicable.

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Avangrid appreciates the opportunity to submit these comments and looks forward to working with Bonneville on these issues. By return e-mail, please confirm Bonneville’s receipt of these comments.

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<sup>1</sup> Bonneville explained that during a redirect, if a child request needed less than 10% more transmission than the parent’s request then customers expected the request to pass the *de minimis* test, but it would actually fail because the software does not test the net. This means that any child request that has a greater impact than its parent will fail the *de minimis* test.

<sup>2</sup> Customer comments are available at:  
<https://www.bpa.gov/transmission/CustomerInvolvement/TC20Implementation/HourlyFirm/Pages/default.aspx>.