From: Steve Andersen

Sent: Monday, April 28, 2025 3:11 PM

To: Farleigh,Kevin S (BPA) - PSW-6

Subject: RE: [External] - Standards for Resource Declarations under Provider of Choice

Kevin,

I reviewed the Draft Provider of Choice Contract Exhibit A Standards for Resource

Declarations and have a few comments. I reviewed it with the draft River Road Exhibit A in

mind. My comments are:

Energy Capability Standards

Resource Category 4: Dispatchable and/or Non-Renewable Thermal Resources –

Standard

This standard states that “non-federal resource amounts will be flat amounts applied over

the year except in cases of refueling or maintenance”. The draft Exhibit amounts for River

Road (shown below) vary monthly, are significantly lower in the shoulder months of Mar,

Jun, Sep and Nov and are zero in non-WRAP months (April, May and October). The annual

amount of River Road energy in Exhibit A will be 102 aMW. The draft monthly Exhibit A

amounts are as low as 40 MW and as high as 225 MW. The variation in monthly Exhibit A

amounts don’t match up with the statement that “non-federal resource amounts will be

flat amounts applied over the year except in cases of refueling or maintenance”. However,

there is a statement at the end of the section that states that “if an alternative standard

has been adopted by public process, that standard will apply”. Clark and BPA ran a public

process back in 2022 that concluded with the Administrator’s 9/29/22 letter granting Clark

the ability to reduce the River Road annual amount included in the POC contract Exhibit A

to 102 aMW. The Administrator’s letter did not speak to monthly dedicated resource

amounts, but perhaps BPA had the 2022 public process in mind when it drafted the final

sentence of this section.

Draft Exhibit A (provided by email on 10/31/24)

Peaking Capability Exhibit Standards

The second paragraph of this section states that “ for months where WRAP does not

provide a QCC (e.g. April, May and October), BPA will use the lower of the QCC amount of

the WRAP month preceding or the WRAP month following the month(s) with no value”. This

approach does not work for River Road. The plant will be off-line in April, May and October.

We cannot run the plant in those 3 months and comply with the CETA requirement that

only 20% of our load be served by River Road. We will also be doing annual maintenance

each April and/or May. The number of weeks of maintenance will depend on the year. We

could also shift our maintenance period to October in the future. Regardless of the

maintenance schedule, River Road will not be running in April, May and October and the

Exhibit A capacity amount should be zero in all 3 months.

Thanks,

Steve