From: Aaron Yale-Bush

Sent: Tuesday, April 29, 2025 4:47 PM

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

Subject: Resource Declarations - Peaking

Hey Kevin,

Responding with some very brief feedback on the resource declarations. I saw your email with the comment notice a little bit ago, but we’ve been wrapped up in product decision stuff. I think a handful of other Slice/Block customers are going to ask for more time to review and provide feedback. It might be helpful to chat through this quickly – my assumption/interpretation was that the document reflects prior policy decisions, and BPA is unlikely to move away from those. Based on some internal concern at EWEB, I added a little language in red to reflect that our resources (Carmen) might have very dynamic fish requirements, which might require very different operations month to month. This would make prior/following month infill a little tricky. Given that this is an informal comment period, and I have not run this language by anyone internally or gotten feedback from you, chatting is probably useful to level-set.

Jon – let me know if you have any questions/concerns.

Kevin – same. Let me know where you think BPA might be on this issue. Also, sorry for the long-

winded language below – I was trying to fit it into the format that already exists.

Peaking Capability Standard for Non-federal Resources.

The affected resources include all non-federal resources except for (1) committed power

purchases, (2) consumer-owned resources and customer resources not dedicated to total

retail load, (3) any co-owned and added phase resources that are consumer-owned

resources, and (4) any co-owned behind-the-meter-resources that are consumer-owned

resources. Standards for the exceptions are noted below.

Standard

The standard will be the Western Resource Adequacy Program (WRAP) Qualifying

Contribution Capacity (QCC) amounts. The amounts will be captured by month. For co-

owned resources, QCC amounts will be determined for each share and/or phase.

For months where WRAP does not provide a QCC amount (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 unless a customer demonstrates that a

resource’s operating conditions for a specific non-WRAP month are materially different

than the preceding or following months. If using preceding or following month values, BPA

will look at September and November QCC amounts and choose the lower of the two

amounts to serve as a proxy for the October QCC amount. For April and May, BPA will

select the lower of March and June WRAP QCC values and select the lower if March and

June to serve as proxy April and May QCC values. If a customer demonstrates that the

preceding or following monthly QCC values do not reflect operating conditions or

constraints, BPA and the customer will follow the critical capacity hour or similar WRAP

methodology to establish applicable peaking values for months without WRAP QCC

values. If WRAP supplies QCC for additional, or all, months, this methodology will no

longer apply and WRAP QCC values will be used.

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