

**Comments of Grant County PUD No. 2 on BPA's
"Draft Provider of Choice Contract Exhibit A Standards for Resource Declarations"**

On April 28, Grant became aware – through communication with other BPA customers – that BPA had requested comments on the “Draft Provider of Choice Contract Exhibit A Standards for Resource Declarations,” dated April 15, 2025. While BPA’s Provider of Choice website and Multi-Process Implementation Timeline do not specify a deadline for submitting comments on these draft Standards, some customers indicated to Grant an understanding that comments are due by April 29, and Grant’s Account Executive confirmed the April 29 deadline. BPA’s standards for dedicating specific amounts of non-federal power (energy and capacity) are critical to determining Customers’ rights to federal power on both planned and retrospective bases, and require thoughtful consideration. In the interest of preserving a fair and transparent process, Grant PUD respectfully submits the following preliminary comments and requests that BPA (a) provide additional time for further review of the draft Standards and (b) post and communicate widely a reasonable deadline for final comments.

1. Grant recommends that BPA add a provision that any future revisions of these Standards will occur only after consultation with Customers. For example, BPA has identified litigation as a determining factor for Category 2 (CEAEA) values, and it is not possible to know at this point what that litigation will yield. Interpretation of the results of litigation is likely to be required before specific CEAEA values will be known for individual projects and individual months. BPA has also reserved an ability to update the peaking capability standard if BPA no longer participates in WRAP or if WRAP ceases to exist. A successor to WRAP may be adopted, in which case BPA should consult with Customers before updating these Standards.
2. Grant recommends that the language in the Standards be “trued up” to the appropriate Exhibits in the POC contract template, especially Exhibits A and J. Further questions based on this comparison are posed below.
3. Grant recommends that the Standards be identified as either “default requirements” or a “starting point” for discussions with individual customers who may have unique circumstances.
4. Grant recommends that the Standards be sub-identified and revised, as necessary, depending on product choice, given the different effects of these Standards on BPA’s obligation to serve.
5. In Resource Category 1, BPA should remain open to methodologies other than PNCA in 2009 for determining monthly firm hydro generation values, if the Customer in its normal course of business can demonstrate that it relies on non-PNCA values or a different water year. For example, Grant’s 2024 IRP (at page 58) notes that seasonal water risk (the variability of flows across months) has changed over time and that “current data is more reflective of future expectations”. Grant expects that the diurnal/monthly firm values output of PRP projected in Grant’s regular Integrated Resource Plans (IRPs) will differ from the 2009 PNCA results to achieve the most realistic projected energy volumes. For example, flow constraints for salmon habitat driven by FERC licensing could change over time, which could affect PRP’s expected energy production by month. (See Grant’s 2024 IRP, Appendix 2.) Also, the historical outage assumptions in the 2009 PNCA regulation are not likely to be accurate given Grant’s significant investments at PRP since the early 2000s. The values of PRP in Grant’s IRPs are developed in public forums and relied on for multiple decisions by Grant, and should thus be acceptable for planning purposes in the new POC contract.

6. The default standard for Category 6 power supplies (Committed Power Purchases, or CPPs) appears to require equal hourly amounts across all hours of a given calendar month, but the language is unclear: “*equal hourly amounts between HLH and LLH*” may mean “the same amounts in all hours” or “the same *difference* between HLH and LLH in all hours”. Both interpretations may conflict with the actual terms of a given CPP. This is also an example of potential conflicts between Exhibit A of the draft contract template and the proposed Standards. On the issue of specific CPP amounts, Grant has separately raised concerns about the language in Exhibit A of most recent draft contract template.
7. Regarding Category 7, Grant supports the default standard for granularity defined by “annual expected generation” (i.e., MWh/year), but notes that Consumer-Owned Resources may be CPPs, and the draft language in Exhibit A requires more detail for CPPs than would be reflected in a single annual number. See Grant’s comments on Exhibit A submitted on April 9, 2025. BPA should ensure that Exhibit A works with the Dedication Standards.
8. Regarding Category 8, Grant supports the default standard of “annual expected generation” for energy, because these resources do not affect billing or purchase obligations, and this information will be submitted for informational purposes only.
9. It is not clear why the dedication standards for resources in Categories 9 and 10 are necessary for a Customer operating its own Balancing Area, and Grant asks that BPA reconsider the draft language for these resources. Grant also addressed this situation generally in its template comments of April 9, 2025.
10. The language for Peaking Capability appears to contradict Exhibit A in the most recent POC contract template, because CPPs are explicitly omitted in the Standards but MW amounts are required in the template.
11. Grant has not sufficiently considered the proposed language if WRAP has “missing months”, and reserves the right to provide additional comments. (There also appear to be minor typographical errors that could create confusion in this language.)
12. Regarding the peak capability of Category 6 CPP resources (p. 5), BPA proposes that peak capability will be determined by “average HLH energy by month”, whereas CPPs are only permitted to have one value for all hours of the year according to the POC template. Grant is uncertain about the intent of the proposed language in the Standards.
13. BPA proposes that consumer-owned resources in Categories 7-10 will have no listed peaking capability, but the POC template requires consumer-owned resources to identify peak values (e.g., §3.1 for Block and Slice/Block customers). Grant does not know how to reconcile these two approaches, or what BPA’s intentions on this subject might be. Grant also notes that the “no listed peaking capability” standard identifies consumer-owned resources, but the heading for this section includes customer-owned resources, so the scope of the Standards on this subject is unclear.

Thank you.

Sincerely,

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/s/ Andrew Munro (amunro@gcpud.org)
On behalf of Grant County PUD