



August 9, 2022

Via Electronic Submission

John Hairston
Administrator and Chief Executive Officer
Bonneville Power Administration
911 NE 11th Avenue
Portland, OR 97232

Re: July 27, 2022 Resource Adequacy Engagement Workshop

Dear Administrator Hairston:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback on Bonneville Power Administration’s (“BPA” or “Agency”) July 27, 2022 Resource Adequacy (“RA”) Engagement Workshop, as well as BPA’s engagement on these issues and commitment to solutions that provide flexibility for its customers, which ultimately benefits AWEC’s members. Over the past several WRAP workshops, BPA has engaged in discussions related to the implications of and solutions for both New Large Single Load (“NLSL”) and Above High Water Mark (“AHWM”) load served by Unspecified Resource Amounts. Because AWEC’s membership includes both loads that have and have not been determined to be NLSL, as well as loads served by non-federal AHWM resources, AWEC has an interest in the options available for its members’ host utilities’ loads, both federal and non-federal, under the Western Resource Adequacy Program (“WRAP”).

To date, it is clear that WRAP’s load exclusion process allows a path forward for the exclusion of NLSL load, generally. We appreciate the clarification that the delineation point for exclusion is whether the load for which exclusion is sought is discrete and separately metered, rather than a determination being made on a consumer’s total load that may be only partially comprised of NLSL. AWEC also appreciates the clarification that a customer has the flexibility to exclude some NLSL load, while perhaps not excluding other NLSL load to the extent that it has more than one NLSL. AWEC does, however, seek clarification on whether and how BPA will consider any type of limit on the amount of eligible NLSL load that can be excluded, and whether the consideration for that limit would be a BPA decision, or whether BPA views that as a determination made at the WRAP level.

Additionally, AWEC understands that the exclusion process for NLSL is for each forward showing season, and that NLSL determinations are made annually. As such, there is an opportunity for NLSL load, to the extent that it is designated, to be either included or excluded with each forward showing season. AWEC supports this treatment. However, if BPA is considering limits to a customer’s ability to make new elections each forward showing season and what those limits may be, AWEC requests that BPA clarify its thinking on this issue as soon as possible.



Finally, it seemed from the workshop and follow-up conversations that there could be a need for additional clarification on how a utility's consumer load might be treated if it had both a grandfathered amount of PF-served load and an amount of load considered NLSL at the same site. AWEC is interested in discussing this further to ensure that these types of customers can have an option to exclude the NLSL portion of their consumers' load and treat the PF-served portion separately.

AWEC looks forward to continuing to work with BPA and stakeholders to determine the appropriate solution for the treatment of NLSLs and AHWM load as it relates to the WRAP, Regional Dialogue contracts, and BPA's statutory obligations.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers