



September 26, 2022

*Via Electronic Submission*

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

**Re: September 13th 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”) September 13, 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. At the September 13<sup>th</sup> meeting, BPA requested feedback on its proposed public engagement process, and indicated its preference for stakeholders to raise substantive issues as far in advance of the September 29<sup>th</sup> public meeting as possible.

AWEC understands that BPA’s public timeline is driven by the Western Resource Adequacy Program’s (“WRAP”) request for a commitment from participants by December 16, 2022. To aid its decision on whether and when BPA should join Phase 3b, BPA proposes a formal public process consisting of an additional public meeting on September 29<sup>th</sup>, a draft closeout letter in mid-October, and a final public meeting on October 20<sup>th</sup>. AWEC is concerned that there is not enough time between the September 29<sup>th</sup> public meeting and the draft closeout. The September 29<sup>th</sup> meeting will be the first meeting that stakeholders learn WRAP’s determination on BPA’s Qualified Capacity Contribution (“QCC”), and the earliest opportunity for BPA to address other stakeholder concerns, such as BPA’s business case for joining Phase 3b and responses to outstanding customer feedback tracked in the WRAP Public Considerations spreadsheet received following the July 26, 2022 workshop. Given the breadth of outstanding information and stakeholders’ need to process and comment to inform the draft closeout letter, AWEC recommends that BPA look for additional flexibility on the front-end of its proposed process that would allow for customers to provide meaningful feedback on the information presented on September 29<sup>th</sup> and for BPA to have the time to consider this feedback prior to posting the draft closeout letter. To be clear, AWEC is not advocating for BPA to provide a response to WRAP later than its requested date, but rather, to allow for more engagement prior to the draft closeout letter by shifting that and the third public meeting back by a couple of weeks.

More substantively, significant questions related to New Large Single Load (“NLSL”) and Above-Rate High Water Mark Load remain outstanding. AWEC appreciates



BPA's engagement and the progress made to date to address stakeholder questions and concerns. Given BPA's proposal in BP-24 to price resource adequacy at \$2.73/MWh, there is now a specific cost associated with BPA's decision to move forward, but questions remain about the details of exclusion for NLSL load, the feasibility of obtaining QCC-compliant non-federal resources, and the utility-customers' abilities to manage costs on behalf of their customers, including AWEC's members, given BPA choices in program implementation. AWEC continues to request responses to its questions, reflected as items 98, 99 and 100 on the Public Considerations Tracker. UEC also raised several issues of interest to AWEC, including its request for analysis of benefits and risks under Regional Dialogue contracts as well as in a post-2028 contract timeframe and its request for clarity around BPA's position that loads served with unspecified resource amounts will impose costs on the Federal power system necessitating credits and penalties. Understanding BPA's position on these issues will assist AWEC's members in understanding the implications and strategies for customers.

AWEC looks forward to continuing to work with BPA and stakeholders to determine whether BPA should join WRAP's binding Phase 3b, and if so, which binding season BPA should elect. To answer these questions, it is necessary that BPA's process allow for meaningful consideration of stakeholder feedback once BPA has provided the necessary information.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers