

June 28, 2018

Via Email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of Avangrid Renewables LLC on the CSGI Pilot

Avangrid Renewables LLC (“Avangrid Renewables”) hereby comments on the Ancillary and Control Area Services (ACS) Practices Workshop presentation (the “June 14 ACS Workshop Presentation”)¹ discussed at the Ancillary and Control Area Services (ACS) Practices Workshop of Bonneville Power Administration (“BPA”) on June 14, 2018 (the “June 14 ACS Workshop”). Avangrid Renewables appreciates the opportunity to submit comments to BPA and looks forward to working with BPA on these matters.

In the April 24, 2018 BP-20 Workshop on the topic of Ancillary and Control Area Services BPA proposed to remove the Customer Supplied Generation Imbalance (“CSGI”) scheduling election from its proposed BP-20 rate schedules. At the June 14 ACS Workshop, BPA revisited the topic in response to customer comments encouraging BPA to retain the CSGI option. BPA has clarified that despite its prior proposal to remove the CSGI scheduling election, it is open to conversations with interested parties and would be willing to continue to use the framework of the CSGI program in the future. In the June 14 ACS Workshop Presentation, BPA requested additional comment, focused on three proposed alternatives for treatment of the CSGI scheduling election for BP-20.² In particular, BPA desires feedback on whether it should: 1) maintain the status quo for CSGI service, although with the addition of language requiring sufficient prior notice to BPA; 2) eliminate the CSGI service from the rate schedule and the Business Practice listings; or 3) place the CSGI Business Practice on hold and remove the CSGI option from the rate schedule.³

Avangrid Renewables continues to believe that the CSGI program provides BPA’s customers with tools for self-supply that are more robust than BPA’s separate self-supply option. BPA helped to build a creative, dynamic program with the CSGI pilot, therefore Avangrid Renewables encourages BPA to adopt alternative one, maintaining the status quo and allowing for customers to choose the CSGI scheduling option upon appropriate notice to BPA. As part of this proposal, BPA should also consider allowing for mid-rate period election changes in order to provide customers the flexibility to explore new technologies or unique approaches to self-supply. Providing customers the opportunity to explore and engage in such technological advances is consistent with BPA’s broader goals of more efficient utilization of resources and

¹ Available at https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/RateCase/2018.06.14_ACS-Practices-Wrkshp.pdf.

² June 14 ACS Workshop Presentation at 7.

³ *Id.*

allows for BPA to continue to develop dynamic solutions that have the potential to provide benefits to all of its customers.

Avangrid Renewables appreciates BPA's review of these comments and consideration of the recommendations contained herein. By return e-mail, please confirm BPA's receipt of these comments.