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BPA BP-24 Workshop Comments from June 29 workshop July 13, 2022

Long-term ATC

RNW supports BPA's proposal to replace the long-term ATC calculation with bi-monthly commercial powerflow studies. In addition to our survey responses, RNW offers this additional comment: The CTIM is a close enough proxy to the "What If" analysis to be sufficient moving forward. RNW cautions that BPA may need to provide some training support to customers who are new to BPA's system. BPA should consider ways to make the underlying ATC and conditional firm data used in CTIM transparent to the user.

Eastern Intertie

RNW agrees with BPA that the Eastern Intertie will continue to provide benefits to the region beyond the 2027 termination date of the Montana Intertie Agreement. BPA should roll the Intertie rate into network service when it addresses rate treatment in BP-26. RNW also urges BPA to consider benefits of additional upgrades that can maximize capacity on its system to support Montana imports and exports.

EIM Benefits

As BPA starts collecting more data on EIM participation, RNW encourages BPA to analyze the impact that EIM participation on inputs to renewable resource integration services and rates (such as VERBS), as well as any potential impacts to transmission customers. BPA should also continue to evaluate broadly the impacts of EIM participation on various rates and services, such as the examples raised by NIPPC in the June 8 workshop for Operational Control for Balancing Services and using the EIM to mitigate the need for OMP displacement.