

**Comments of the M-S-R Public Power Agency
Regarding Bonneville Power Administration’s
Reliability Tool**

The M-S-R Public Power Agency is a joint powers agency formed by the Modesto Irrigation District, and the Cities of Santa Clara and Redding, California, each of which is a consumer owned utility. Beginning with a 2005 contract, M-S-R obtained contractual rights to the output from some of the first large scale wind resources developed in Washington State. M-S-R and its members currently have rights to 350 MW of wind generation in Washington and Oregon, which its members use to serve their customers and meet California’s Renewable Portfolio Standards (RPS). Those customers ultimately bear the cost of the Bonneville Power Administration (“BPA”) transmission rates.

M-S-R appreciates the opportunity to comment on BPA’s reliability tool, the scope of which was described in the May 5, 2014, straw proposal as: *“Applies to all non-Automatic Generation Control controlled generation scheduled in BPA BAA with measured Station Control Error, subject to predefined thresholds, when Station Control Error threatens BPA BAA reliability.”* From the initial discussion, M-S-R understood the reliability tool is intended to replace DSO-216, and would generally apply to all generators other than those with Automatic Generation Control.

Additional discussion of the tool took place at the June 10, 2014, Gen Inputs Workshop, during which exemptions for several broad categories of generators were discussed. Potential exemptions appear to include co-generation facilities, and generators that lack 2-way communications. To understand how these exemptions relate to the pool of resources potentially subject to the reliability tool, it would be helpful to know the capacity of the resources that BPA anticipates as being subject to the new reliability tool. In that regard M-S-R seeks the following information:

Type of Resource	Total Capacity	Capacity Subject to Reliability Tool
All generation in BPA		
FCRPS Generation		
Columbia Gen Station		
All Thermal		
Cogeneration		
Wind Generation		