

To: [techforum@bpa.gov](mailto:techforum@bpa.gov)  
From: Jeff Kugel, Resource Analyst  
Date: December 7, 2015  
Subject: Transmission Load Service (TLS) Available Transfer Capability (ATC) Comments

PNGC would like to submit the following comments regarding the recent discussions on BPA's proposed ATC methodology changes.

PNGC appreciates BPA's willingness to discuss and explain not only the proposed changes to the ATC methodology, but also the explanation on how current ATC is calculated. We understand it is BPA's intent to eliminate the Contract Existing Transmission Commitments (ETC) portion of the ATC methodology and use a planning ETC on a going forward basis. PNGC would support eliminating the Contract ETC and focusing on a planning ETC based on the premise that it would streamline and simplify the ATC calculations. We still need to complete some additional due diligence to be comfortable with this move, but are in support of using planning ETC only.

There are several components of the proposed planning ETC methodology that PNGC would like to comment on below:

1. Load Inputs

PNGC supports BPA's proposal to use the 1-2 Non Coincidental Peak (NCP). This offers a good representation of what actual peaks will likely occur and also has some margin of error built into the numbers due to using the NCP, as it is unlikely all BPA members will peak at the same time.

2. Wind Assumptions

As we understand there are NT wind ON/OFF scenarios that provide sensitivities for the planning ETC model runs. As PNGC understands, the NT wind is approximately 200 MW and is a rather small component of the overall resource mix. We would be in favor eliminating the NT wind scenarios and freeing up BPA staff time to run other scenarios (TBD later) that would be more useful.

3. Federal Columbia River Power System (FCRPS) Dispatch Logic

Currently, the FCRPS is dispatched via a table that allocates a certain MW amount from each federal power plant. PNGC would be in favor of BPA's proposal to break up the FCRPS into three regions which would enable BPA to use the regions of generation to help relieve congested flowgates (possibly). We would also be in favor of using an adjusted nameplate rating to reflect expected outages.

4. Balancing Logic

We understand in the past, to balance load and generation, BPA has backed off the FCRPS (only) to balance the system. PNGC recognizes this has become an outdated assumption and needs to change. We support the pro rata approach that backs off all generators an equal amount to balance the system. This is a fair and reasonable solution, and leaves BPA out of the guessing game of which generators to back off and by how much.

5. Load Growth

Currently, the Contract ETC involves a lengthy process in which each BPA customer's load is analyzed for load growth to be included in the Contract ETC. With the elimination of the Contract ETC, a new process is needed to account for load growth. PNGC supports BPA's proposed solution of using the regional load growth rate, rather than trying to individually calculate and apply load growth on a per customer basis. PNGC recognizes that the load growth portion of the ATC is a small portion and that the extra work associated with individual load growth calculations is not worth the small amount of increased accuracy. However, if there are certain individual customers that are experiencing significantly greater than average regional load growth, there should be a mechanism in the new ATC methodology to account for large load growth.

6. Uncertainty Margin

PNGC does not have a position on the uncertainty margin as of yet. We cannot support any positions at this time, but this is an important issue and we will be studying it closely in the coming meetings and discussions.

These comments reflect where PNGC stands on the proposed methodology as of today, and as we learn more our positions will inevitably evolve as well. We look forward to discussing this further and appreciate all of BPA's time and energy spent on this issue.

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