



Stakeholder Comments Template

Resource Adequacy Enhancements

Submitted by	Organization	Date Submitted
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Bonneville Power Administration (Bonneville) appreciates the opportunity to comment on the Resource Adequacy Enhancement Revised Straw Proposal.

Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and other regional entities prior to selling power out of the region.

Please provide your organization's overall position on the RA Enhancements fourth revised straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

System Resource Adequacy

As an entity interested in marketing System Import RA to California LSEs, Bonneville is in full support of the overall approach outlined in the Fourth Revised Straw Proposal. The four proposed Tariff changes address the concerns around double counting and speculative supply that need to be addressed.

Bonneville supports the CAISO intention to adopt the Must Offer Obligation to the Real-Time Market for all MWhs but only as an interim measure until the Day Ahead Market Enhancements initiative is developed which considers MOO-related issues. The CAISO noted the intended interim nature of the MOO on page 30 of the Straw Proposal. Bonneville would like the final proposal to be clear in the intent that the Real-Time MOO is an interim solution until the Day Ahead Market Enhancement Initiative is completed and at that time the MOO-related issues will be consistent across the initiatives.

As a supplier of resource adequacy products, Bonneville operates a system of resources (31 Federal dams with multiples of generators) in concert, to meet its total load obligation (including import RA obligations), and it carries more than a sufficient level of reserves to fulfill its obligations. Any specific unit outage has no impact on Bonneville's ability to provide firm energy to fulfill its load obligations. Bonneville views its system, as well as other similar cascading hydro systems, as far superior to a single generating resource when considering reliability and availability. Bonneville agrees that any of the five resource types proposed by the CAISO in Table 3 will provide the CAISO with what is needed to ensure performance and that supply committed is available to the CAISO markets through the operational timeframe. The CAISO should also make it clear that for these specific resource types, the MOO can be fulfilled with economic bids. As BPA has discussed in earlier comment submittals, economic bidding is fundamental to efficient market outcomes, by limiting the CAISO's obligation to accept energy imports even when that energy is of little, or perhaps negative, value to the grid.

Additional comments

Bonneville continues to support ongoing coordination with the CPUC and between the RA Enhancements, DAME and EDAM initiatives to ensure all of the interrelated aspects work together without unintended consequences.