



Stakeholder Comments Template

RA Enhancements

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on March 20.

Submitted by	Organization	Date Submitted
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Bonneville Power Administration (Bonneville) appreciates the opportunity to submit comments on CAISO's Resource Adequacy Enhancements Straw Proposal – Part 2. Bonneville looks forward to participating in the workgroups and providing comment on the full proposal for Resource Adequacy Enhancements.

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 22,500 MW. 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 then other regional entities prior to selling power out of the region.

Please provide your organization's comments on the following issues and questions.

RA counting rules and assessment enhancements

BPA understands the details of the proposed new structure have not been fleshed out and will occur within the upcoming workshops and a follow on proposal. CAISO's February 27, 2019 straw proposal is unclear how the capacity counting rules will apply to Import RA that is sourced from a system rather than from a specific resource. The CAISO has yet to specifically address how, when, and if Non-Resource Specific System Resource imports over the Intertie, will be affected by the counting rules. In the final strawman BPA requests the CAISO lay out clear rules for import RA resources that are Non-Resource Specific System Resource imports.

It is also unclear how the EFORD will be calculated for Non-Resource Specific System Resources and if there will be an accounting of outages on the Interties when determining the EFORD. BPA supports the principle of treating RA resources consistently across

internal resources and imports but also sees the unique value in a system based RA resource that can help meet the needs of RA within California. Hydro based systems the size of Bonneville's do not inherently have a forced outage rate that impacts its power sale commitments because of the large number of units in its generation fleet. Single unit outages have no measurable impact on its ability to meet commitments.

Review of RA import capability provisions

BPA supports the CAISO developing enhancements to the Available Import Capability Assignment process that ensure unused MIC is offered back to the market in a manner that improves the efficient utilization of import capability. BPA encourages the CAISO to use Import transfer capability (adjusted for annual outages) as the basis for setting the MIC and not historical flows to allocate MIC. This would minimize any restrictions Load Serving Entities may have to procure RA.