



Comment Summary

July 29 BPA Public Meeting

**Rachel Dibble, Director of Market
Initiatives**



Comments

Topic	Comment Summary	BPA Response
BPA Customer Engagement and Decision Making	Concern the schedule for decision is aggressive	BPA's decision making timeline is based on the phase 3A participation deadline set by the NWPP RA Program. BPA successfully advocated for extension of the decision-making timeline to allow for this BPA public process and discussions with customers.
BPA Customer Engagement and Decision Making	Do not include decisions in draft letter on how the agency might implement the RA program	BPA is not making any final decisions regarding the program since the program itself is neither completely formed nor finalized. BPA is considering the reasonableness of continuing its participation in the initiative's Phase 3A.
BPA Customer Engagement and Decision Making and Transmission Assessment	Request for discussions during Phase 3A to thoroughly vet issues and looking for commitments on engaging power and transmission customers, including draft timeline, in the draft letter.	We will discuss a proposal for public engagement during Phase 3A in this meeting and welcome feedback. BPA agrees that transmission customers are an important part of ongoing engagement throughout Phase 3A.

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Transmission Assessment	Various specific questions about the transmission procedures and impacts on BPA customers.	<p>The transmission proposal will be further developed in Phase 3A. BPA agrees these are important questions and we expect to use them to inform NWPP work in further defining the transmission proposal.</p> <p>To clarify, the NWPP RA Program will NOT change:</p> <ul style="list-style-type: none"> • BPA’s calculation of ATC or treatment/calculation of operational limits. • Scheduling and tagging rules. • Requirement to obtain transmission through the BPA OATT. • BPA’s commitment to meeting TC20 obligations. • BPA’s commitment and obligation to operate a reliable power and transmission system.
BPA as the Load Responsible Entity	Create new capacity product for Slice-Block customers and/or mechanisms for BPA to make excess capacity available for sale	BPA is working with Slice-Block customers to understand Slice customers’ concerns and potential solutions should BPA decide to participate in the binding program.

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BPA as the Load Responsible Entity	How will BPA respect statutory preference rights in both the forward and operational timeframes while simultaneously meeting its commitments in the program?	BPA's participation in the initiative allows BPA to help develop rules that accommodate BPA's federal agency obligations and other statutory purposes, including the application of preference.
BPA as the Load Responsible Entity	How will BPA preserve the rights and obligations of both BPA and its customers under the Regional Dialogue contracts when such rights and/or obligations may conflict with the requirements of the RA program?	BPA is cognizant of its contractual obligations under the Regional Dialogue contracts, as well as its customers' obligations. If both BPA and customers identify issues that could arise BPA is open to discussing such issues and how to address them, if necessary.
Cost Allocation	Recommend BPA engage with load following customers that use unspecified resources and, potentially, the NWPP's RA Program regarding the best way to handle unspecified resources during the non-binding phase.	BPA recognizes this is an issue and will work with load following customers to develop a solution.

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Business Case	Critical information to be vetted before making decision to join the binding phase of the program.	BPA agrees we have much to learn and analyze before making a decision about joining the binding program. That decision is 15 months in the future and we expect the experience of participation in the NBFS program to inform that decision.
Business Case	Include the P50 load of BPA's Slice-Block customers in the calculation of BPA's participation fee for the non-binding phase in lieu of charging individual fees to each Slice-Block customer that desires to participate.	If BPA chooses to participate in Phase 3A, we will participate as the LRE for our load following customers. BPA will not cover the fees for Phase 3A participation of our slice customers due to the additional cost and complexity of such an arrangement. BPA encourages customers to reach out to NWPP to explore potential options for reducing costs of participation.
Business Case	BPA should work with the NWPP to ensure that there is a reasonable cost avenue for load following customers (considering switching to Slice-Block for post-2028 period) to join the RA Participant Committee so they can participate in the ongoing development of the program prior to 2028.	There is no avenue for current load following customers to directly participate on the RAPC because BPA would serve the LRE function under the NWPP RA program. BPA continues to encourage all customers to actively participate in public meetings during the NWPP RA Program development. BPA will also engage load following customers in meetings throughout Phase 3A as the design is further developed.