



TO

THE BONNEVILLE POWER ADMINISTRATION



**REPORT OF THE INDEPENDENT EVALUATOR
REVIEW AND VALIDATION
2023 OVERSUPPLY MANAGEMENT PROTOCOL FILINGS**

May 31, 2023

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REPORT OF ACCION GROUP, LLC
INDEPENDENT EVALUATOR FOR BONNEVILLE POWER ADMINISTRATION
REVIEW AND VALIDATION OF 2023 FILINGS

I. EXECUTIVE SUMMARY

Accion Group, LLC (“Accion”) was selected by Bonneville Power Administration (“Bonneville” or “BPA”) to serve as Independent Evaluator (“IE”) for the Oversupply Management Protocol Program (“Program” or “OMP Program”). Accion created and administers the Website (“Website” or “Program Website”) through which the Program is managed.

The OMP provides compensation to Generators that opt to participate in the Program when their generation is displaced by Federal generation. Bonneville designed the Program to ensure displacement is done on a least-cost basis to ensure that lower-cost Generators are displaced prior to higher-cost Generators. All Generators must submit data in support of their costs in order to receive compensation for displacement. The Program is conducted through the Program Website designed to the specifications identified by Bonneville. The Website provides a Disclosure Form to be completed and submitted by Generators for each generating facility located in Bonneville’s balancing authority area. Following the submittal of the Disclosure Form, the IE verifies that the Generators’ claimed costs are supported. The process used by the IE for Validation (“Validation Process” “Validation” or “Process”) was devised by Bonneville, in coordination with the IE, to provide Bonneville with confidence that claimed costs are fully supported by documentation. The Validation Process provides for the IE to review the submissions of Generators to validate the data that was provided.

Thirty-one(31) Submissions were initially received this year from eighteen (18) Generators. With the exception of those submitted by Generators who opted out of the Program, claiming zero (0) costs, the IE performed an in-depth review of all submissions for Validation.

Most Generators were familiar with the process due to previous participation in the Program and, most provided adequate support documentation to facilitate an efficient Validation Process. As is also the case from year to year, there were some new account managers who had not participated in past years, and therefore, were not familiar with the process and needed some assistance.

The documentation Generators provide in support of their Submittal is left to the discretion of the individual Generator; however, documentation must be sufficient to verify costs claimed on their Submittal Forms.

Most Generators provided documentation typical to the industry but unique to the individual Generator. As an example, in some instances the Generator provided documentation

that confirmed some claimed costs or established an obligation to deliver energy for only part of the year. In most instances where a bundled contract was submitted, the contract had an execution date prior to March 6, 2012, as required.¹ However, during the Validation Process, further review of supporting documentation provided by all Generators the IE identified four (4) contracts with execution dates after March 6, 2012, all claiming costs that did not meet the requirements of Attachment P. These Submittals were subsequently withdrawn, as the Generator opted out of the Program.

The IE conducted its initial review for all Submissions following the Submittal period deadline. Following the initial review, the IE requested additional support documentation or expanded explanations relating to claimed costs from five (5) Generators. As a result of the preliminary review and subsequent in-depth review of the initial thirty-one (31) submissions, including responses to the IE’s requests for additional information, the IE found sufficient supporting information from each Generator to confirm the basis for claimed costs for twenty-seven (27) of the submissions². This is discussed further in the Summary Review section of this Report.

II. 2022 OVERSUPPLY MANAGEMENT PROTOCOL WEBSITE



A new “Silo” was created on the Program Website for the 2023 Oversupply Management Protocol. As was with previous Program years, the Website Silo was provided using the previous years’ Website design as a basis to provide a degree of consistency for all participants: Generators, Bonneville personnel, and Website administrators. The Website was edited to reflect the current Program year and updated to reflect edits and/or improvements as discussed with BPA. The process remained user-friendly and familiar for returning participants. Information provided on the Website to assist Generators with their Submittals was reviewed and updated as needed. All Silos for previous

¹ Attachment P, Oversupply Management Protocol, Section 3.c.

² The IE Report was submitted to BPA on May 31, 2023. A minimal number of clarifications were further requested by the IE to validate some displacement claims provided. Responses were subsequently provided by those specific Generators and were validated as of June 29, 2023. These instances are noted within the IE Report.

Program years remained and still remain available on the Website so Generators can access their previous Submittals for historical reference. All data from previous years is maintained and accessible on Accion's Website, available to the individual Generator and the IE only. This makes it possible to compare past Generator participation in the Program (2012 through 2022) to the current year's (2023) registered participants. This feature serves to assist Generators when reviewing past compliance filings should they wish to do so, and also provides the IE with a database for contacting those Generators who had registered in prior years but had not yet registered in the current 2023-2024 Program Year. As part of the annual review, the IE compared prior filings with the 2023 submissions to identify any changes in generating facility ownership, etc.

The IE communicated with Bonneville regarding any questions as to Generator changes. Bonneville personnel were responsive to all inquiries from the IE, and in all instances, provided requested information promptly and completely.

A. 2023 PROGRAM LAUNCH

The 2023 Website was launched on March 1, 2023. The IE identified the list of Generators registered on the 2022 Program Website to determine which Generators should be contacted and invited to register on the Program Website to participate in the 2023 Program. Bonneville also provided the latest Generator contact information.

The following Announcement, provided by Bonneville, was posted on the Announcements Page of the Website, and sent to all Generators registered on the 2022 Website, and additionally to the list of Generators provided by BPA, notifying them to register for the 2023 Program:

Posted (PPT) 3/1/2023 7:31:04 AM

Announcement

Requested Action: *Submit Displacement Costs by March 15, 2023*

Subject Description:

As spring approaches, so do the natural elements that provide the Northwest with abundant energy resources. Each year, generators with eligible displacement costs must submit those costs in March, in order to receive compensation per our Oversupply Management Protocol (OMP) adopted as Attachment P of our Tariff in 2012. This is a Tariff requirement, and not an indication that an OMP event is imminent.

BPA's OMP is a tool that BPA can use at any point in the year to address oversupply issues, but historically those events are most likely to occur during the spring runoff. BPA will, to the best of its ability, give notice if there is a risk of implementing the OMP via Tech Forum notice. Operations information related to hydro, thermal and wind conditions and transmission loading can always be found on the BPA Oversupply website at www.bpa.gov/energy-and-services/transmission/oversupply.

Questions about BPA Oversupply Management Protocol may be directed to techforum@bpa.gov with "Oversupply" or "OMP" in the subject heading.

*As of Wednesday, March 1, 2023, generators can start registering on the Accion site for 2023 cost submittals at <https://oversupply.accionpower.com>. Per Attachment P, Oversupply Management Protocol, generators must self-certify and submit their facility's displacement costs by March 15, 2023, for inclusion in the Least-Cost Displacement Cost Curve. Updates have been made to the site for submitting displacement costs. **Generators must register to the 2023 website silo, even if they registered and participated in previous program years.***

Failure to submit displacement costs for a facility will result in a displacement cost of \$0/MWh for that facility. Additional details on the protocol and guidelines for displacement costs are available in Attachment P and in the [Oversupply Management Protocol Business Practice](#).

As stated in the [Oversupply Management Protocol Business Practice Section C Establishing Minimum Generation Levels and Maximum Ramp Rates](#), Generator operators and owners also should update their minimum generation levels in the Customer Data Entry system.

For the most up-to-date calendar of events, please visit the [BPA Event Calendar](#).

To submit comments and questions or unsubscribe, email to techforum@bpa.gov. Click [here](#) to subscribe.

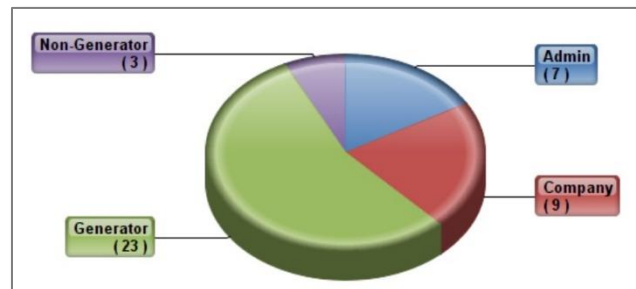
B. REGISTRANTS AND SUBMITTALS ON THE 2022 WEBSITE

The IE reviewed the 2023 Generators that had registered to participate in the 2023 Program and compared the current year participants to those Generators that had participated in the 2022 Program but were not registered on the 2023 Website. For those that had not registered, the IE contacted them using registration data from the 2022 Website to verify if they were aware of registrations. Initially an email was sent, and if unresponsive, each Generator was contacted by telephone. As noted, the IE reached out to BPA to confirm any changes in Plants and/or Generators that might affect the accuracy of the contracts.

Forty-two (42) individuals registered on the 2023 Website. They registered as Generators, Non-Generators, Bonneville Personnel or Website Administrators/the IE. The following charts show the status of both registrations and Submittals as of the date of this Report and are shown in real-time on the Program Website. The charts can be re-formatted based on the user preference for chart type and data displayed.

Total Registrants:	42
Generators Registered:	23 ³
Non-Generator	3
BPA (Company) Registrants:	9 ⁴
Site Administrator Registrants:	7

Figure 1
User Types = 42



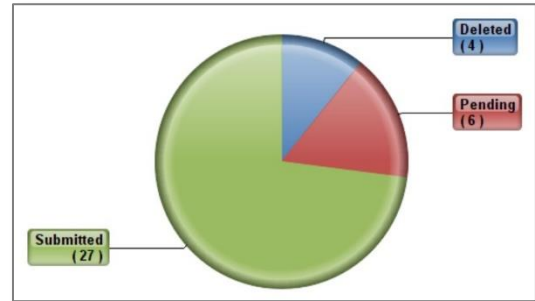
³ Includes two (2) Administrative Test Registrations.

⁴ Includes one (1) Administrative Test Registration.

Total Submittals: 27

The four (4) deleted Submittals represent Submittals started and subsequently deleted and all were replaced by new Submittals. One (1) Generator created a new Submittal Form to correct an error in its pricing in its original Submittal. One (1) Generator left a Submittal pending.⁵

Figure 2
Submittal Types = 37

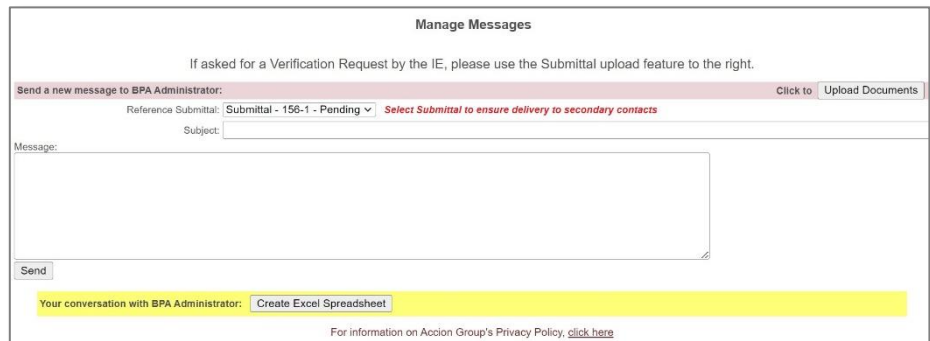


C. MESSAGES AND COMMUNICATIONS

Communications Between Generators and the IE

Generators and the IE used the Message Board on the Website to correspond with each other. If Generators had questions or concerns regarding Submittals or the process, they used the Message Board to send a confidential message to the IE, and the IE responded also using the Message Board.

Figure 3



By using the Message Board for all communications, which time and date-stamps them, a permanent record of all conversations is maintained on the Website for future reference.

The IE monitored the Submittals up to and during the days following the Submittal due date of March 15, 2023, to make certain all Generators that wanted to participate had the option to do so, and that Submittals were completed as intended.

As of the date of this Report, six (6) Generators used the Message Board to send their questions or submit additional information regarding their Submittals. The total number of messages originated by these Generators was eleven (20)⁶, and twenty-four (36) messages were sent by the IE to Generators asking for clarification, confirming Submittals, responding to questions

⁵ In this instance, one (1) Generator started a Submission Form, but left it incomplete, as a Submittal Form for the specific Plant had been previously completed and submitted by another registrant from that Generator's Company, leaving the status showing "pending."

⁶ Messages from Generators represented questions regarding the Oversupply Program and the Submittal process, OMP IE Website use, requests for confirmation of their submittals, and responses to requests from the IE.

or requesting additional supporting documentation for Validation of Costs represented on Submittals.

If Generators responded to telephone inquiries with return calls or direct email responses, the IE transferred the information to the corresponding Message Page, to maintain a record for future regulatory review.

Communications between BPA and the IE (“Manager Messages”)

BPA Administrators and the IE used the Manager Messages Board on the Website to correspond with each other. The Manager Messages feature is similar to the Message Board utilized for communications between the IE and Generators but is solely for communication between BPA and the IE. No other party has access to the Manager Messages Board. If BPA had questions or concerns regarding Submittals or the process, they used this Message Board to send a confidential message to the IE, and the IE responded also using the Manager Messages Board (Figure 4).

Figure 4

The screenshot shows a web interface titled "Manager Messages". At the top left, there is a "Manager Docs" button. Below it is a "Send a new message:" section with a "Subject:" input field and a larger "Message:" text area. To the right of the message area are "To:" and "CC:" sections, each with a dropdown arrow and three checkboxes labeled "Judd, Harry", "McRobbie, Patrick", and "Tucker, Mark". Below the message area are "Send Now" and "Send Later" buttons. A yellow highlighted bar contains an "Author Filter:" dropdown menu set to "- Select Author -". At the bottom left, the user's name "Sheri Vincent-Crisp" and company "Accion Group, LLC" are displayed, along with a "Reply to This" button. At the bottom right, the recipient information "To: Mark Tucker" and "Confirmation of Comments" is shown.

In this manner a permanent record of all conversations is maintained on the Website for future reference.

III. SUBMITTAL PROCESS

Information from Generators was collected on the Program Website. Each Generator was provided with a confidential, individual Submittal Book with a separate file system for each generating facility identified by the Generator.

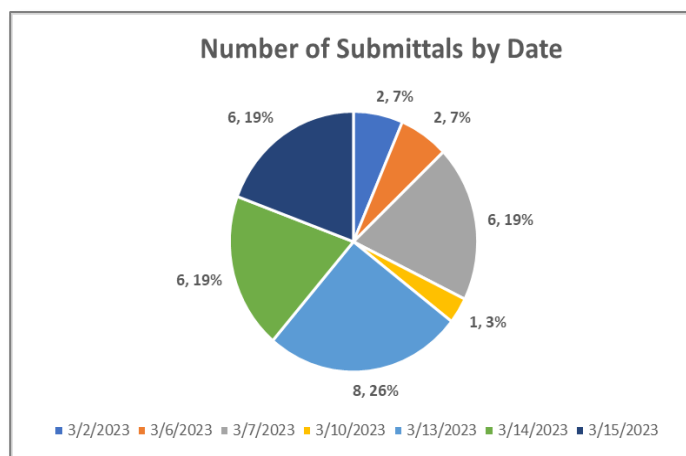
Via the Website, on their Submittal Form, each Generator was required to provide monthly cost data for Light Load Hours (“LLH”) and Heavy Load Hours (“HLH”). Alternatively, the Generator could decline to claim LLH or HLH by a simple “click” on the Submittal Form, resulting in “0” costs claimed. Generators were also provided the option of claiming Renewable Energy Certificates (“RECs”), or, alternatively, declining to do so.

As previously noted in this report, all the data from previous years’ Programs is maintained

and accessible (archived) on the Website and available to the individual Generator and the IE. One (1) Generator asked for access to their previous year’s Submittals and was directed by the IE as to its accessibility. As part of the annual review, the IE compared prior filings with the 2023 submissions to identify any changes in Generating Facility ownership, etc., and communicated with Bonneville regarding any questions as to Generator changes. This comparison and discussions with BPA were beneficial to ensure that the IE had access to the most current and accurate list of Generators, Plants and contact information in order to ensure all eligible Generators had the opportunity to participate had they wished to do so.

When completing the online Form, Generators were provided the opportunity to revise their statement of costs before submission. Also, Generators were permitted to revise cost data on a prospective basis, with the revised cost data being employed two (2) months after the month in which the revision was submitted. Revising cost data initiates a verification by the IE to confirm the new cost data submitted. As of the date of this report, one (1) Generator submitted a revised Submittal. If a Generator submits a revised Submittal(s), once the revised Submittal(s) is eligible, the respective original Submittal(s) would be withdrawn by the IE and replaced by the newly revised Submittal(s) to be included in the Displacement Cost reports or the Pricing Reports generated each month and released on the Website to Bonneville personnel authorized to receive the information.

Figure 5

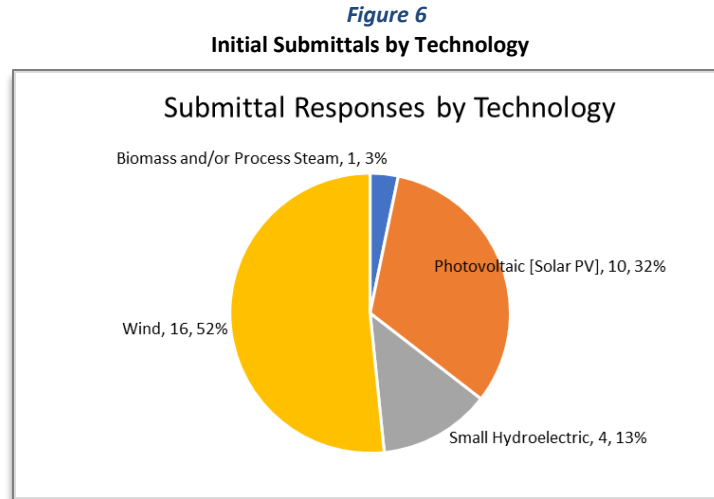


On March 13, 2023, prior to the March 15, 2023, Submittal deadline, an email from the Program Website was sent to all Generators that had outstanding Submittals, reminding them of the pending due date. The IE monitored the Submittal process and once the initial Submittal deadline passed, reviewed the status of all registrations and Submittals. Other than two (2) Generators that had completed their Submittal Forms, but had not submitted them, all Generators had submitted their Forms by the Submittal due date.

Most Generators provided sufficient information in a timely manner, so the IE could begin review of eligibility.

SUBMITTAL RESPONSE

Eighteen (18) Generators submitted an initial thirty-one (31) Submittal Forms as shown in the *Initial Submittal Responses by Technology* chart in **Figure 6**.



During the IE's Validation review, one (1) Generator withdrew its four (4) Solar PV Submittals. This occurred when it became aware its claimed costs were not allowed with respect to contracts for the sale of a facility's output executed after March 6, 2012. This Generator decided it would not re-submit edited cost claims, resulting in a total of six (6) Solar PV Submittals, and twenty-seven (27) total Submittals.

As part of the Submittal process, Generators were required to upload documentation supporting the Displacement Cost data included in their Submittal Forms. All Generators provided at least one document unless they did not claim costs on their Submittal. Most Generators provided additional supporting documentation. A summary regarding the number of Required and Supporting Documents provided by Generators for each Submittal is shown in **Table 1** of this Report, which appears in the following pages.

IV. VALIDATION PROCESS

All completed Submittal Forms and their respective Required and/or Supporting Documents were reviewed by the IE to determine if the supporting documentation Generators provided with their Submittal was sufficient to validate their claimed costs. If additional supporting information was needed for their claimed costs, the IE reached out to the Generators individually via the Website's confidential Message Board.

The IE notes a consistent number of Generators that provide specific documentation making the Validation Process efficient and accurate. The fact remains that some Generators only make market sales and, therefore, it remains challenging to provide an easy way for that to be

reported. At the same time, most Generators have participated in the Program for several years and are therefore more familiar with the documentation required.

Ultimately, in all cases the IE found the information provided and reviewed was sufficient to complete Validation because the Supporting Documents identified the claimed displacement values. The Validation of claimed costs permits Bonneville to have confidence that the costs claimed by Generators are accurate.

V. REVIEW OF 2023-2024 PROGRAM YEAR SUBMITTALS

The goal of this review is to summarize the quality of information provided by all responding Generators, with the IE determining if there was need to seek information from the individual Generators, beyond what was provided by each Generator at the time the Submittal Form was completed. The Program is premised on Generators providing correct data, supported by documentation requested by the IE as part of the Validation Process.

A. INITIAL REVIEW

The IE performed an initial review once all Submissions had been received on the Website, prior to commencing with the in-depth Validation Process. During the initial review, the IE reached out to four (4) Generators identified as needing to provide additional information. Three (3) provided sufficient information to cure the deficiencies as requested with no additional information needed.⁷ One (1) provided a replacement Submittal to correct errors in its original Submittal.⁸ Following this review, it was necessary for the IE to reach out to an additional Generator to verify the claimed costs within its four (4) submittals, due to discrepancies regarding compliance with Attachment P.⁹

Table 1 is a summary of the initial review of the documents provided with each of the thirty-one (31) Submissions and also provides insight into the quality and quantity of documentation provided by Generators. This is followed by a description of any instances when the IE reached out to clarify or collect additional information from Generators, and the status of each Validation.

Table 1
Summary of Validation Review by Independent Evaluator

Submittal No.	Required Document Provided	Supporting Documents Provided
501-01	1	1
501-03	1	1
501-04	1	1
501-05	1	1
504-02	Claimed 0 Costs	
504-03	Claimed 0 Costs	

⁷ These Generators' Submittals are shown in Table 1, identified by blue text (*Submittals 511-01, 520-01, 525-01*).

⁸ This Generator's replacement Submittal (June 2023) is shown in Table 1, identified in green text (*Submittal 526-02*).

⁹ This Generator's Submittals are shown in Table 1, identified by red text (*Submittals 514 -01, 514-02, 514-03, 514-04*).

Submittal No.	Required Document Provided	Supporting Documents Provided
507-01	1	1
508-01	1	2
509-01	1	1
510-01	1	2
510-02	1	2
510-03	1	2
511-01	1	
512-01	1	1
512-02	1	2
513-01	1	
514-01*	1	1
514-02*	1	1
514-03*	1	1
514-04*	1	1
515-01	1	4
519-01	1	
519-02	1	
519-03	1	1
519-04	1	1
520-01*	1	2
521-01	1	1
522-01	1	1
523-01	1	1
525-01*	1	5
526-01*	1	1
526-02*	1	

* Submittals were withdrawn by Generator.

*Submittals for which additional information was requested by the IE for Validation and provided by Generator.

*Submittal replacing 526-01 (June 2023).

B. SUMMARY REVIEW

The following provides a review of the 2023 Submittals (2023 Review). The IE also reviewed the corresponding 2022 Submittals for comparison and consistency of data provided by Generators for Validation.

The IE found there was sufficient documentation to support the claimed costs as provided on Submittal Forms as noted in the reviews. If a Generator was asked to provide additional information, the original Submittal data was retained on the Website.

Ultimately, in all cases the IE found the information provided and reviewed was sufficient to complete Validation because the Supporting Documents identified the claimed displacement values.

SUBMITTAL 502-01

2023 Review

This Generator provided a Standard Renewable Off-System Variable Power Purchase Agreement dated August 26, 2016, with a 20-year term. The PPA includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices were taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE was able to verify the costs claimed after reviewing the submittal data and supporting documentation provided. This meets the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 502-03

2023 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term. Cost calculations were additionally provided for the years 2015-2040, with detailed pricing calculations included in Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices were taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE was able to verify the costs claimed after reviewing the submittal data and supporting documentation provided. This meets the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 502-04

2023 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated May 16, 2016, for a 16-year Term. Cost calculations were additionally provided for the years 2015-2040. This included Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices were taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE was able to verify the costs claimed after reviewing the submittal data and supporting documentation provided. This meets the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 502-05

2023 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated April 26, 2016, for a 20-year Term. Cost calculations were additionally provided for the years 2015-2040 and includes Schedule 201 Qualifying Facility 10 MW or less Avoided Cost Power Purchase Information and detailed pricing schedules. The REC prices were taken from the Spectrometer Report under the National Green-E Solar Offer Price.

The IE was able to verify the costs claimed after reviewing the submittal data and supporting documentation provided. This meets the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 504-02

The generator claimed zero (0) costs.

SUBMITTAL 504-03

The generator claimed zero (0) costs.

SUBMITTAL 507-01

2023 Review

The Generator claimed Bundled Recs and Energy and provided a PPA dated March 24, 2009, with a term of 20 years with supporting data. Exhibit B offered sample calculations and guaranteed energy amounts, short-fall amounts, and shortfall liquidated damages. Generator referenced a specific section in the PPA that provided for the contract pricing, for Energy + RECS.

SUBMITTAL 508-01

2023 Review

This Generator claimed Unbundled RECs supported by a PPA dated June 24, 2009, for a 20-year term was supplied to support this Submittal. Supporting documentation for displacement cost methodology was provided showing 2023 Cost of Displacement calculation.

SUBMITTAL 509-01

2023 Review

This Generator provided a Purchase and Sales of Energy and Renewable Energy Certificate Confirmation dated September 10, 2018, pursuant to the terms of the Master Service of the same date. The Certificate of confirmation links to the original PPA dated September 23, 2011, with a term from January 1, 2019, to August 13, 2024. Additionally, it provided a

completed IE Validation Form Template used in past Program years and updated for the current 2023 Program Period to show total Displacement Cost. In the 2023 Program year Submittal, the 2023 IE Validation of Displacement Cost Form refers to PPA prices for RECs and Energy.

SUBMITTAL 510-01

2023 Review

In support of Claimed Bundled RECS and Energy, this Generator provided a PPA dated August 14, 2008, for a term of 20 years and an electric service agreement dated April 15, 2011. Other documentation provided included the First Amendment to Electric Service Agreement dated December 1, 2015, and Oregon price summary in effect as of January 1, 2023. Additional supporting documentation provided with this Submittal were documents provided and reviewed in previous Program Years.

SUBMITTAL 510-02

2023 Review

This Generator claimed Bundled RECS and Energy and provided a 20-year Renewable PPA dated August 14, 2008, as a Required Document. To support claims of loss in the event of curtailment, this Generator provided two documents: The Electric Service Agreement relating to the Facility and Delivery Service Schedule dated April 15, 2011, with an amended effective date of December 1, 2015, and PUC OR No. 36 – Schedule 47 regarding Large General Service/Delivery Service. Additional supporting documentation provided with this Submittal were documents provided and reviewed in previous Program Years.

SUBMITTAL 510-03

2023 Review

This Generator provided a 20-year Renewable PPA dated April 14, 2008, as a Required Document supporting Bundled REC and Energy Cost Claims submitted. This Generator provided two documents to support claimed displacement costs: The Electric Service Agreement relating to the Facility and Delivery Service Schedule dated April 15, 2011, with an amended effective date of December 1, 2015, and PUC OR No. 36 – Schedule 47 regarding Large General Service/Delivery Service. Additional supporting documentation provided with this Submittal were documents provided and reviewed in previous Program Years.

SUBMITTAL 511-01

2023 Review

This Generator is new to the OMP Program. It provided a Specified Source Transaction Confirmation, governed by an EEI Master Power Purchase and Sales Agreement effective as of April 25, 2000. Schedule I, included, was a Master Power Purchase and Sales Agreement

(Trading & Marketing) effective as of February 7, 2023 together with exhibits, schedules and supplements. Fixed monthly pricing information supports those costs claimed as submitted in its Form. Further, IE reached out to this Generator for additional information regarding its contract status. The costs claimed were found to meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE was able to confirm the costs claimed in the Submittal.

SUBMITTAL 512-01

2023 Review

This Generator claimed Unbundled RECS in their Submittal. The required documentation supporting this Submission was in the form of the following: a Karbone Pricing Data Chart dated February 24, 2023, and explanation of Pricing Methodology: Wind Curtailment Price Calculation and several Portfolio Volumes charts. Generator noted in their documentation, the REC value was the value of the Pacific Northwest WA compliant Green-e Eligible REC. Additionally, documentation in the form of WAC 480-109-200 Renewable Portfolio Standard was included explaining eligibility and target years. Documentation in the form of a Master and Maintenance Agreement dated August 2, 2010, was also provided. The IE reviewed the 2022 Submittal Documentation in order to compare with the 2023 Submittal and supporting information, which was found to be consistent in both Program Years.

SUBMITTAL 512-02

2023 Review

This Generator claimed Unbundled RECs. The required documentation supporting this Submission was in the form of the following: a Karbone Pricing Data Chart dated February 24, 2023, and explanation of Pricing Methodology. Generator also provided a letter dated April 25, 2012, from the Department of Labor and Industries re: Certificate of Apprentice Labor Standard. Documentation in the form of WAC 480-109-200 Renewable portfolio standard was included explaining eligibility and target years. Pricing Methodology was provided in the form of an Excel Chart showing Wind Curtailment Price Calculation – 2022 WA RPS REC Price, Green-e REC Price, Apprenticeship Credit Multiplier and Net REC Value.

SUBMITTAL 513-01

2023 Review

The Required Document provided by the Generator in support of its claim for Bundled RECs and energy was a Power Purchase Agreement dated as of July 28, 2008, for a term of 15 years. Appendix A of the PPA provided an Excess Energy Payment schedule that provided purchase price for Delivered Energy and non-excess Energy delivered. During the IE's review,

confirmation was sought regarding the end of the term of the PPA, and Generator confirmed this PPA ends January 31, 2024.

SUBMITTAL 514-01 (Withdrawn)

2023 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated January 25, 2016, for a 20-year Term. Cost calculations were provided for the years 2015-2040 in Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed it would not be participating in the 2023 OMP Program.

SUBMITTAL 514-02 (Withdrawn)

2023 Review

This Generator provided a Standard Renewable Off-System Variable PPA dated June 27, 2016, for a 20-year Term. Cost calculations were provided for the years 2015-2040 in Schedule 201 Pricing Options for Standard PPA (Renewable Fixed Price Options On-Peak and Off-Peak Forecast). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed. The Generator was given the opportunity to correct their deficiency, however, confirmed its election to not participate in the 2023 OMP Program.

SUBMITTAL 514-03 (Withdrawn)

2023 Review

The Generator provided a Standard Contract Off System PPA for Intermittent Resources dated April 27, 2016, for a 16-year Term. Cost calculations were provided for the years 2015-2040. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed it would not be participating in the 2023 OMP Program.

SUBMITTAL 514-05 (Withdrawn)

2023 Review

The Generator provided a Standard Contract Off System PPA for Intermittent Resources dated June 26, 2016, for a 20-year Term. The PPA includes Schedule 201 Pricing Options for Standard PPA (Renewable and Standard Fixed Price Options). This did not meet the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE reached out to the Generator for additional information regarding product claimed, and the Generator was given the opportunity to correct their deficiency. The Generator confirmed it would not be participating in the 2023 OMP Program.

SUBMITTAL 515-01

2023 Review

In support of its claim for Bundled RECs and Energy, this Generator provided a PPA dated August 1, 2009, for a term of 20 years. Several additional documents were provided supporting the Submittal. Documentation included an Amerex Brokers LLC Daily REC Pricing Bulletin, North American REC Markets dated March 13, 2023, and Amerex Carbon Markets Sheet dated March 14, 2023 with relevant dates. An Excel sheet referencing Energy/REC/GHG values total per 2022-2023 Program Year by month was also provided.

SUBMITTAL 519-01

2023 Review

Bundled RECs and Energy Cost Claims by this Generator are supported by documentation of a PPA dated November 30, 2000, for a 25-year term. Included in the PPA are several tables showing contract year amounts. The pricing charts include the Contract Rate and an Excel of the Output Contract Rate Schedule with pricing. Also provided was a PPA (Fifth Amendment) dated February 1, 2016.

SUBMITTAL 519-02

2023 Review

This Generator claimed Bundled RECs and Energy. Supporting documentation includes an Amended and Restated PPA dated November 27, 1996, for a 30-year term, with the commencement of Commercial Operation date of 1999. Included was a schedule of Integration of Resources and monthly charge rate details.

SUBMITTAL 519-03

2023 Review

This Plant came online in April 2022. Documentation provided was a Solar + Storage PPA dated February 11, 2019, with a 30-year Generating System Term, or Solar Term, and 20-year Storage Term. Additionally, a Precedent Transmission Service Agreement dated August 18, 2010, was provided. This Generator claimed Unbundled RECs, supported by a detailed explanation of pricing calculations and methodology, along with a PCC1 Power + REC Chart for 2023 and 2024.

The IE was able to confirm the costs claimed in the Submittal, consistent with the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012.

SUBMITTAL 519-04

2023 Review

Unbundled RECs claimed by this Generator are supported by the provided Wholesale Renewable PPA dated February 11, 2019, for a 30-year term. Included within the PPA documentation were multiple Exhibits defining generation and output, monthly invoice procedure, and pricing calculation. Additionally supplied as supporting documentation was a Transfer Agreement regarding a Precedent Transmission Service Agreement dated August 18, 2010. Also supporting this Submittal is a PCC1 Power and REC Chart for 2023 and 2024.

This Generator claimed Unbundled RECs, thus meeting the requirements of Attachment P, Section 3.c.i.2.a.i, with respect to contracts for the sale of all or part of a facility's output executed after March 6, 2012. The IE was able to confirm the costs claimed.

SUBMITTAL 520-01

2023 Review

To support its claim for Unbundled RECs, this Generator provided a REC Transaction Confirmation email to support values provided in the Submittal Form, confirming 2022 REC sales, and that it was using the same assumptions as previous years: unstructured RECs only.

An Excel sheet was provided with a chart of 2022 REC Prices. The chart represented the 2023 Filing for 2022 Transactions dated April 1, 2021 to November 17, 2022, by structured and unstructured type, resulting in an average price per REC.

SUBMITTAL 521-01

2023 Review

The uploaded required documentation included with this Submission was an executed Standard Contract Off System PPA for a term of 20 years, for Intermittent Resources effective

April 29, 2010, with highlighted text, “[a]ll energy shall be prescheduled according to customary WECC scheduling practices (Fixed Price as shown)”.

Also included was a Legislative Ordinance passed on July 11, 2011, and approved on July 18, 2011, authorizing execution of a 15-year agreement for the term authorizing purchase of environmental attributes in the form of RECs necessary or convenient for meeting the Washington State Energy Independence Act. A Master Renewable Energy Certificate Purchase and Sale Agreement dated September 21, 2010, was also provided.

SUBMITTAL 522-01

2023 Review

In support of its claim for bundled RECs and energy, this Generator provided a Renewable Resource PPA executed on August 26, 2008, for a 20-year term. The PPA included pricing information. The Generator also provided a 2023 IE Verification Chart used to detail Total Claimed Displacement Costs, also referring to the PPA. Additionally, PPA pricing for bundled energy and RECs and contract prices were provided.

SUBMITTAL 523-01

2023 Review

This Generator provided a 2022 IE Verification of Displacement Cost Chart detailing Total Claimed Displacement Costs. Additionally provided was a Power Purchase and Sales Agreement and Master Power Purchase Agreement dated May 28, 2008, for a 15-year term with attachments. The Master PPA provided detailed pricing and delivery information for bundled energy and RECs pursuant to the agreement. Also included in the supporting documentation was a P&S Energy and RECS Confirmation dated September 10, 2018, with Attachment A, Assignment and Assumption Agreement (Service Agreement Point to Point Transmission service dated September 23, 2011, through 2024).

SUBMITTAL 525-01

2023 Review

Documentation provided by this Generator included a Renewable PPA dated February 25, 2010, for a term of 15 years and a chart with PPA Pricing showing annual CPI Adjustments (2012 to 2023). Two (2) Memos were provided to and from the CEO dated March 15, 2023, regarding Energy Value Review with a detailed Chart supporting the 2023-2024 pricing claimed on the Submittal Form, along with a WSPP Agreement with Firm Bundled REC Confirmation Schedule dated December 2021.

SUBMITTAL 526-01

2023 Review

This Generator's PPA dated November 7, 2011, for a 20-year Term, ended October 1, 2022. The IE's initial review noted that this Generator was in the process of contracting for a multi-year PPA and indicated it expected that to be complete in April 2023.¹⁰ Generator indicated it would continue to deliver energy per month-to-month PPA's until it enters into another multi-year PPA when the expected contract was completed. Supporting Documents included a Service Schedule C Confirmation - Transaction Specific Agreements dated February 27, 2023 to sell and purchase energy pursuant to the WSPP Agreement as supplemented and modified in the chart provided. The Period of Delivery was March 1, 2023 to March 31, 2023. The latest agreement was uploaded to the Program Website for the Period of Delivery April 1, 2023 to April 30, 2023, valid until May 1, 2023.

The newly completed PPA was subsequently provided on May 31, 2023 with updated June 2023 contract documents, including Exhibits providing detailed information regarding claimed displacement costs. At the request of the IE, this Generator submitted an updated Submittal Form, claiming Unbundled REC only, complying with the allowed claimed displacement costs per the guidelines of Attachment P, for contracts executed after March 16, 2012.

C. COMPARISON OF 2022 AND 2023 RESULTS

In 2022, seventeen (17) Generators completed and submitted thirty (30) Submittal Forms, of which all Submittals included at least one (1) Required Document supporting their claimed displacement costs, along with at least one (1) Supporting Document. Of the thirty (30) Submittals, thirteen (13) also included additional Supporting Documents.

Three (3) Generators ultimately withdrew their initial Submittals, and the IE provided the opportunity for them to create new Submittals to correct their misinterpretation of the Oversupply Management Protocols when it originally provided their Submissions.

One (1) Generator notified the IE it decided not to participate in the 2022-23 Program Year, and withdrew its four (4) Submittals, leaving twenty-six (26) Submittals.

Two (2) Generators' Submittals claimed zero costs in 2022.

In 2023, eighteen (18) Generators submitted an initial thirty-one (31) Submittals. All Generators included with their Submittals one (1) Required Document in support of their claimed costs and one (1) additional Supporting Document. Of the thirty-one (31) Submittals, eight (8) also included additional Supporting Documents.

The IE's initial review identified one (1) Generator representing four (4) Submittals that did

¹⁰ As of the date of the IE's initial review, this had not been completed.

not satisfy the requirements of Attachment P. Given the opportunity to edit its product and re-submit its calculated Displacement Costs, it subsequently opted to not participate and withdrew its submittals, with twenty-nine (27) Submittals remaining in the 2023-2024 Program Year.

Two (2) Generators' Submittals claimed zero costs in 2023, consistent with 2022 and previous Program Years.

D. CONCLUSIONS

The IE performed a review of all 2023 Submissions along with comparisons to 2022 Submissions to confirm consistency in pricing and documentation. The information and claims were consistent in both Program years, with additional Supporting Documents requested and provided by some Generators to clarify information provided via Submittals and/or supporting documentation provided. As in previous years, there were some changes in Generator personnel such that those responsible for managing participation in past Program Years were no longer involved in 2023. This resulted in new participants needing assistance with the process. With the assistance of BPA, the IE was successful in identifying these changes and reached out to those individuals to assist them with the OMP and Submittal process and access to their previous OMP Submittals if needed for reference.

As part of the Submission process, each Generator was required to provide supporting documentation of their choosing. After reviewing the documents uploaded with the initial thirty-one (31) Submissions, the IE found the need to request additional documentation and/or clarifications for eight (8) Submittals from five (5) Generators because the initial submissions were insufficient for the IE to complete the Validation Process. All Generators that had been notified of deficiencies in their Submittals or supporting documentation were forthcoming and responded promptly. The IE ultimately determined that all Submissions had sufficient documentation to enable the IE to affirm the Submissions. One (1) Generator withdrew its four (4) non-conforming Submittals, as previously noted. This Generator confirmed via the Website Message Board it would not participate in the OMP Program because its four (4) plants did not meet the requirements outlined in Attachment P, and it did not wish to edit and re-submit its costs for this Program Year.

The IE will continue to coordinate with Bonneville regarding changes in Generators and contacts for managing the Oversupply Program Submittals, including any subsequent requests for data verification. The IE was provided updated information upon request, and responses to questions regarding eligibility for participation in the OMP were provided promptly. Having the latest contact information when the new Program Year was launched, and when starting the review process, improves the initial response rate, thus avoiding the need to have numerous conversations with Generators.