

# PacifiCorp - Stakeholder Feedback Form

## 2019 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

Date of Submittal 11/5/2018

\*Name: Michael O'Brien

Title: Regulatory Director

\*E-mail: michael@renewablenw.org

Phone: 971-271-0548

\*Organization: Renewable Northwest

Address: 421 SW 6th Ave

City: Portland

State: OR

Zip: 97214

Public Meeting Date comments address: 11/1/2018

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Northwest Energy Coalition

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Supply-Side Resource Table Updates

Check here if any of the following information being submitted is copyrighted or confidential.

Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

In PacifiCorp's November 1, 2018, Public Input Meeting the Company stated that "[f]or modelling purposes a \$10[/]MWh cost is added to west wind options to account for third-party wheeling costs (west side wind projects offered into the 2016R and 2017R RFPs interconnect with third party transmission systems)" [slide 4]. The wheeling adder was described as a single fixed point-to-point (PTP) charge spread over the wind resources generating hours.

Renewable Northwest and the Northwest Energy Coalition understand the concept and methodology, but would like to better understand the provenance of the PTP rate(s) that led to the \$10/MWh figure.

Assuming a west wind resource (either Washington or Oregon) with a capacity factor of 37.1% [slide 10], 1 MW of resource would generate (8760\*37.1%) approximately 3,250 MWh in a year.

BPA's Proposed 2020 Transmission, Ancillary, and Control Area Service Rate Schedules and General Rate Schedule Provisions (PTP-20, linked to below in Data Support) have a long-term (LT) firm PTP transmission service rate of \$1.533/kW-month (page 13 of PTP-20). This LT firm PTP rate is equivalent to \$18.396/kW-year, or \$18,396/MW-year. Spread out over 3,250 MWh of operation, this would come to \$5.66/MWh, almost half of the proposed \$10/MWh.

If ancillary services are required, PTP-20 includes a 'scheduling, system control, and dispatch service' rate for long-term firm PTP of \$0.383/kW-month. That would combine with the LT firm PTP rate to become \$1.916/kW-month, or

\* Required fields

\$22.992/kW-year, or \$22,992/MW-year. Divided amongst 3,250 MWh of operation in a year, that comes out to \$7.05/MWh, still significantly below the proposed \$10/MWh amount.

To reiterate, Renewable Northwest and the Northwest Energy Coalition would like to understand which transmission rates were used by PacifiCorp (or by west side wind projects that bid into the Company's 2016R and 2017R RFPs) that led to the proposed \$10/MWh adder.

### **PacifiCorp Response:**

Using the currently effective Bonneville Power Administration rate (point to point (PTP)-18 rather than PTP-20), a sample calculation assuming a 1 megawatt (MW) wind facility operating at a 37.1% capacity factor is as follows:

- Long-term firm transmission service = \$1.471/kilowatt (kW)-month (mo) x 1,000 kW x 12 months = \$17,652/year (yr)
- Scheduling, Scheduling and Dispatch Service = \$0.322/kW-mo x 1,000 kW x 12 months = \$3,864/yr
- Regulation & Frequency Response = \$0.13/MWh x 3,250 MWh/yr = \$422/yr
- Variable Energy Resource Balancing Service (30/60 Committed Scheduling):
  - Regulating Reserves = \$0.13/kW-mo x 1,000 kW x 12 months = \$1,560/yr
  - Following Reserves = \$0.42/kW-mo x 1,000 kW x 12 months = \$5,040/yr
  - Imbalance Reserves = \$0.46/kW-mo x 1,000 kW x 12 months = \$5,520/yr
- Losses: 1.9% x \$20.00/megawatt hour (MWh) (est.) = \$1,235/yr
- Total: \$35,293/yr, or \$10.86/MWh

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**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

BPA PTP-20 Rates: [https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/TC-20%20Settlement/Attachment%201%20to%20BP-20%20Partial%20Rates%20Settlement%20Agreement\\_Tx%20Rate%20Schedules.pdf](https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/TC-20%20Settlement/Attachment%201%20to%20BP-20%20Partial%20Rates%20Settlement%20Agreement_Tx%20Rate%20Schedules.pdf)

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

[Click here to enter text.](#)

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Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.