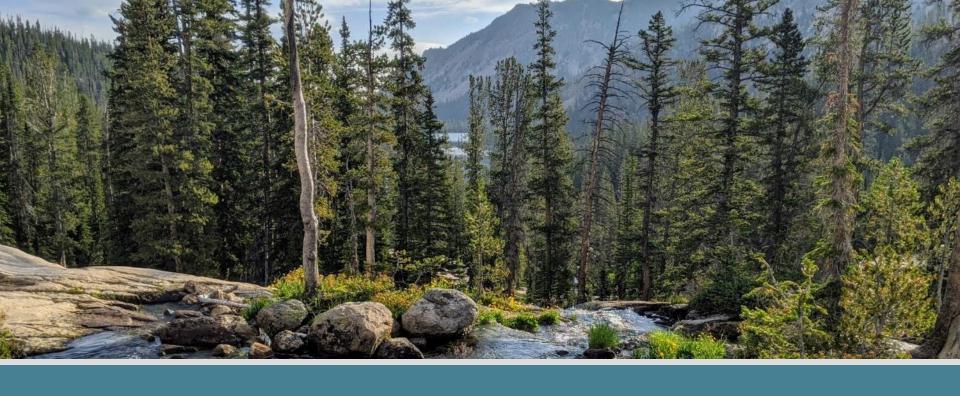


# Provider of Choice Non-federal Resources

November 9, 2022







# Today's Workshop

Michelle Lichtenfels, Program Manager, Provider of Choice

# Agenda

Time Start	Time End	Topic	Presenter(s)
9:00 a.m.	9:05 a.m.	Intro and Expectations	Michelle Lichtenfels
9:05 a.m.	10:00 a.m.	Non-federal Resources Overview	Lindsay Bleifuss
10:00 a.m.	10:15 a.m.	Break	
10:15 a.m.	11:10 a.m.	Non-federal Resources: CHWMs and Future Requirements	Kevin Farleigh
11:10 a.m.	11:15 p.m.	BPA Wrap-Up	Michelle Lichtenfels
11:15 p.m.	12:00 p.m.	Customer Presentations	NRU and WPAG
12:00 p.m.	1:00 p.m.	Lunch	
1:00 p.m.	2:30 p.m.	Customer Presentations (cont'd)	NRU and WPAG

#### **Format**

- Presenters will take pauses for questions.
- There is scheduled Q & A time.
- If a question arises during a presentation, please:
  - Hold your question until a pause, or
  - Write your question in the Webex chat with the corresponding slide number.
- Chat questions will be addressed in the order received.
- We will call on raised hands. You can unmute/mute yourself.
  - Please state your name and organization.

## Workshop Roles & Expectations: BPA

- Distribute workshop materials a minimum of 48 hours in advance via email and/or post on BPA website.
  - Materials will not be printed.
- Start and end workshops on time.
- Facilitate and moderate conversations with an eye on workshop objectives and scope.
- Provide open and inclusive opportunities for feedback, both within and following workshops.
- Respect others and assume good intentions.
- Bring a constructive mentality.



## Workshop Roles & Expectations: Participants



- Come prepared by reviewing materials in advance of workshops.
- Participants are empowered to represent utility or organization, as applicable.
- Share your perspective and provide feedback.
- Limit discussion to the scope of each workshop.
   Don't start side conversations.
- Respect others and assume good intentions.
- Bring a constructive mentality.





# Resources and 5(b)9(c)

Lindsay Bleifuss, Power Account Executive

## **Relevant Statutory Authority**

#### Section 5(b)(1) of the Northwest Power Act:

"Whenever requested, the Administrator shall offer to sell to each requesting public body and cooperative entitled to preference and priority under the Bonneville Project Act of 1937 and to each requesting investor-owned utility electric power to meet the firm power load of such public body, cooperative or investor-owned utility in the Region to the extent that such firm power load exceeds—"



## **Customer Resources**

"Firm power load . . . To the extent that such firm power load exceeds—

(5)(b)(1)(A): "the capability of such entity's peaking and energy resources used in the year prior to December 5, 1980, to serve its firm load in the region, and

(5)(b)(1)(B): "such other resources as such entity determines, pursuant to contracts under this chapter, will be used to serve its firm load in the region."

**Example**: Customer resources includes resources owned and developed by the customer and those purchased via contract.

#### **Section 5(b)(1):**

- Provides that Bonneville serves a customer's firm power load net of its resources.
- Calls out two categories of non-federal resources that a customer is required to take to load.



#### Resource Removal

5(b)(1)(A) and (B) resources must continue to be used to serve firm load unless they are removed through one of the following:

- (1) Administrator's consent,
- (2) Discontinued because of obsolescence, retirement, loss of resource,
- (3) Loss of contract right.

For more information see Bonneville's 5(b)/9(c) policy on determining Net Requirements.

## **Temporary Resource Removal**

Due to year-to-year variance such as a loss of load, a customer's Above-RHWM Load could result in the customer having purchase obligations in excess of its net requirement or Above-RHWM Resources.

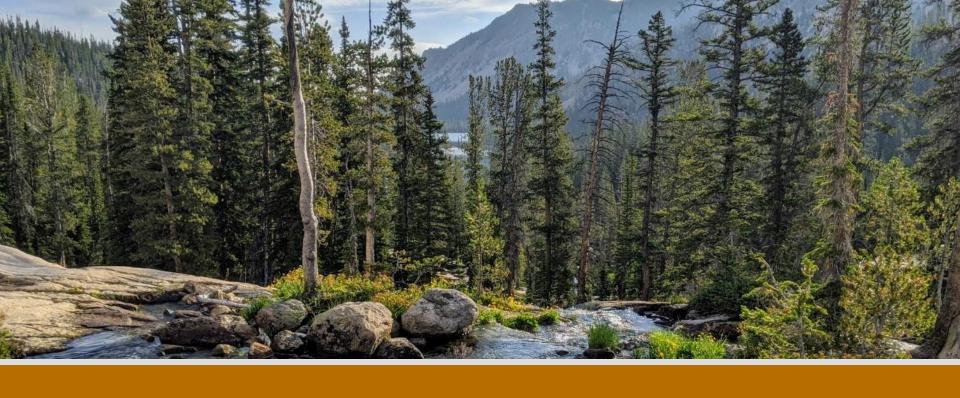
**Under the Regional Dialogue contracts**, customers may **temporarily** remove Above-RHWM Resources from serving their regional firm load, or elect to have BPA re-market purchase obligations at Tier 2 rates, or both.

## **Net Requirements**

- BPA's obligation under section 5(b) of the NW Power Act:
  - BPA is obligated to sell a customer power (Net Requirements) equal to a customer's load (Total Retail Load) minus a customer's resources (Dedicated Resources).
  - Section 5(b)(1)A resources are those dedicated prior to the NW Power Act.
  - Section 5(b)(1)B resources are dedicated after the NW Power Act.

#### Net Requirement = Total Retail Load minus Dedicated Resources

- The FY 2012 FY 2028 Regional Dialogue Power Sales Contracts implement BPA's net requirement obligation and make available firm requirements power to preference customers.
- The Regional Dialogue contracts include a net requirements exhibit (Exhibit A) that lists a customer's Dedicated Resources, if any.



# Non-federal Resource Overview

Lindsay Bleifuss, Power Account Executive

## Regional Dialogue Core Products

#### **Load Following**

- Provides load-following service for metered load less non-federal resources applied to load.
- A Load Following customer's Net Requirement is actual hourly amounts.
- Load Following customers can apply their resources to load in their choice of several pre-defined allowable shapes, or as the resource generates if they agree to purchase Resource Support Services (RSS) from BPA.

#### **Block**

 Provides an amount of power to meet a customer's planned annual net requirement; can be flat or shaped; can be paired with shaping capacity.

#### Slice/Block

 Provides for the combined sale of two distinct power services for service to a customer's planned annual net requirement: the Slice Service and the Block Service.

Note: As planned products, neither Slice nor Slice/Block follow actual loads. Customers taking these products agree to serve any loads beyond that provided by their selected products.

## Take-or-Pay

- Firm Requirements Power is sold on a "Take-or-Pay" basis in Regional Dialogue contracts.
- Take-or-Pay means Customers must pay for their Firm Requirements Power whether they use it or not:
  - Take-or-Pay amounts depend on actual customer loads (under the Load-Following contract).
  - Customers cannot decrease their contractual purchase at the Tier 1 rate by adding nonfederal resources.
    - This prevents 'stranding' federal System costs.
- Take-or-Pay provision provides assurance to the U.S. Treasury that BPA will be able to meet its repayment obligations.

Generally, customers only can add resources to serve Above-RHWM Load.

There are policy exceptions for adding small renewable resources.

## **Tiered Rates**

- Regional Dialogue discussions led to the Tiered Rate Methodology (TRM).
- TRM protected the cost of the existing Federal System by distinguishing between the
   existing system (at the Tier 1 Rate) and resource additions for customers with load
   growth (Tier 2 Rate).
- Each customer received a Contract High Water Mark quantifying how much Firm Requirements power it can purchase at the Tier 1 Rate.
- This 'Rate Tiering' does not meld in new cost resources, and prevents 'diluting' the benefits of the existing System.
- 'Tiering' gave customers the choice of how to serve load growth.

## **Above-RHWM Load**

The Rate Period High Water Mark (RHWM) determines the maximum amount of Tier 1-priced power available to the customer during a given Rate Period.

 Calculated prior to each rate period as a scaled amount of CHWM for changes in the Federal System.

Above Rate Period High Water Mark Load (Above-RHWM Load) is forecasted load in excess of a customer's RHWM as determined in the RHWM Process.

 Forecasted Total Retail Load - Existing Resources - NLSLs - RHWM = Above-RHWM Load



## Serving Above-RHWM Load

#### Customers have **three options** for serving Above-RHWM Load:

- 1) Non-federal Resource (Specified or Unspecified)
- 2) BPA Flat Block Purchase at a Tier 2 rate
- 3) Combination of the two above

#### **Above-RHWM Load Election Dates:**

Notice Deadline		Purchase Period
November 1, 2009	for	FY 2012 – FY 2014
September 30, 2011	for	FY 2015 – FY 2019
September 30, 2016	for	FY 2020 – FY 2024
September 30, 2021	for	FY 2025 – FY 2028

#### **Notice Deadlines and Purchase Periods**

A key interest for Regional Dialogue contracts and the TRM was the development of resources (by BPA or customers) to serve load.

#### **Notice Deadlines and Purchase Periods:**

- Needed to create certainty necessary for development of new resources.
- It was estimated that the 3-year notice and 5-year commitment are the minimum needed to make development of new resources by customers or BPA feasible.
- BPA has a statutory obligation to not only serve the load placed on it by Preference customers, but to make cost-effective choices on resource acquisitions (consistent with the Council's Power Plan, as determined by the Administrator).
- Customers need to follow BPA's OATT and Business Practices to request NT or PTP transmission for non-federal resources.

#### **Dedicated Resource Terms**

**Dedicated Resource** - a Specified Resource or Unspecified Resource Amount that a customer is either required by statute to provide or obligates itself to provide to serve its Total Retail Load.

**Specified Resource** - a named generating or contract resource that has a nameplate capability greater than 200kW, obligated by contract or statute to serve Total Retail Load.

**Existing Resource** - a Specified Resource listed in Exhibit A that was obligated by contract or statute to serve Total Retail Load prior to October 1, 2006.

Existing Resources reduce load that otherwise would be served at Tier 1 Rates.
 See Appendix A for Existing Resource treatment example.

## **Dedicated Resource Terms (Cont'd)**

**New Resource** - (1) a Specified Resource listed in Exhibit A, obligated by contract or statute after October 1, 2006 to serve Total Retail Load, or, (2) any Unspecified Resource Amounts listed in Exhibit A.

 New Resources serve Above-RHWM Loads. See Appendix B for New Resource treatment example.

**Unspecified Resource Amounts** - an amount of firm energy that a customer has agreed to use to serve its Total Retail Load. This amount is not attributed to a specific resource.

 Unspecified Resource Amounts are considered New Resources. See Appendix C for Unspecified Resource treatment example.

#### **Dedicated Resource Amounts**

#### Nameplate Capability and Critical Generation:

- "Nameplate" is the rated output of the resource; for our purposes, it is an indication of how much power a resource can produce.
- "Critical Generation" is an expected reliable amount of power production from a resource with variable 'fuel' availability. For hydro, it is based on a historically low streamflow. For wind or solar, it can be based on historically low periods of wind or sunshine.

# Power Services Planning generally uses "Critical Generation" amounts for Dedicated Resources. Critical Generation amounts are used for:

- Net Requirement calculations
- The resource amount serving Above-RHWM load
- A benchmark for Resource Support Services
- The amount a customer is required to schedule to its load

# Adding and Removing Dedicated Resources

**Adding**: Customers may add a New Resource to serve load in the following circumstances:

- To meet Above-RHWM Load for the upcoming rate period or meet future (within 5 years).
   Above-RHWM Load.
- A small renewable resource in its service territory (Load Following 'SNEER Exception').
- A resource less than 200 kW nameplate (no contract requirement for resources under 200 kW nameplate).

**Removing**: Customers may permanently remove a Specified Resource if the resource's use is permanently discontinued due to obsolescence, retirement, loss of resource, or loss of contract rights (consistent with the 5(b)/9(c) policy.)

## **Consumer Owned Resources**

#### **Consumer-Owned Resource terms:**

- Consumer Owned Resource a generating resource owned by a retail consumer and connected to the BPA customer's distribution system. The resource is greater than 200 kW nameplate and is not used only as a back-up energy source.
- Onsite Consumer Load the electric load of a BPA customer's retail consumer that is directly connected with its Consumer-Owned Resource. See Appendix E for Consumer-Owned Resource treatment example.

Consumer-Owned Resources may be added to a customer's contract at any time, but the customer must make a one time designation of how the consumer owned resource will be used:

- Serving onsite load
- Serving load other than onsite
- Serving load both onsite and other than onsite



# Resources Serving NLSL

#### **Dedicated Resource Amounts for Serving an NLSL:**

Customers may add Dedicated Resources to serve NLSLs.

#### **Consumer-Owned Resources Serving an NLSL:**

- Renewable Resource/Cogeneration Exception An end-use consumer with a facility whose load is, in whole or in part, an NLSL, may reduce its NLSL to less than ten Average Megawatts in a consecutive 12-month period by applying an onsite renewable resource or onsite cogeneration to its facility load. The resource must be continuously applied to serve the NLSL\*.
  - \* Consistent with BPA's "Renewables and On-Site Cogeneration Option under the NLSL Policy" portion
    of its Policy for Power Supply Role for Fiscal Years 2007-2011, adopted February 4, 2005, and the
    NLSL policy included in BPA's Long Term Regional Dialogue Final Policy, July 2007, as amended or
    replaced.
- Consumer-Owned Resources that are not Renewable Resources/Cogeneration.

#### Other Resource Terms

**PURPA\*** Resources – A key distinction between PURPA and other customer resources is that the customer is required by law to take the output from the resource.

- BPA does not enforce take-or-pay for PURPA Resources.
- PURPA resources require the purchase of RSS (specifically Diurnal Flattening Service— Load Following only).

**Resources Not Dedicated to Load** – resources owned by a BPA customer that the customer has not used, or contractually committed, to serve its load.

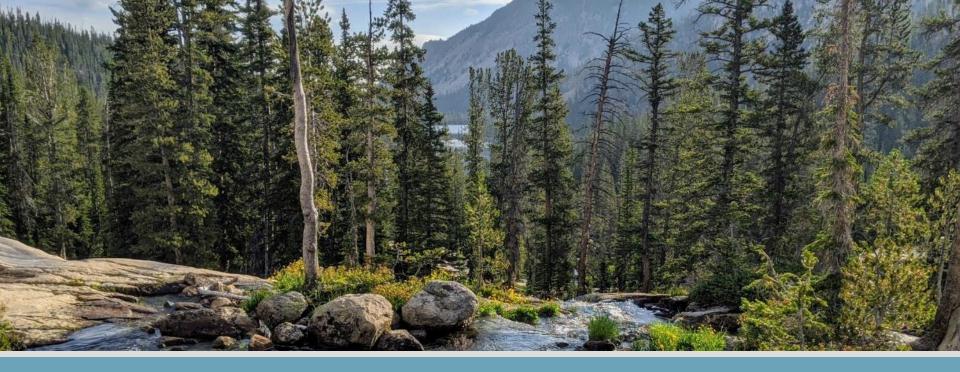
These include resources the customer sells to other entities.

'Merchant' or Independent Power Producer Resources >200 kW are not included in customers' Power Contracts (as long as the utility is not purchasing the output).

- Resources developed for sale outside the utility distribution system, and sold to an entity other than the host utility.
- Metering accessible to BPA still is required.

\*PURPA - (Public Utilities Regulatory Practices Act, enacted November 9, 1978) is a Federal law that requires utilities to purchase electricity from qualified independent power producers at a price that reflects what the utilities would otherwise have to pay for the construction of new generating resources. The Act was intended in part to encourage the development of small-scale cogeneration and renewable resources.





# Concept Paper and Non-federal Resources

Lindsay Bleifuss, Power Account Executive

## Concept Paper and Non-federal Resources

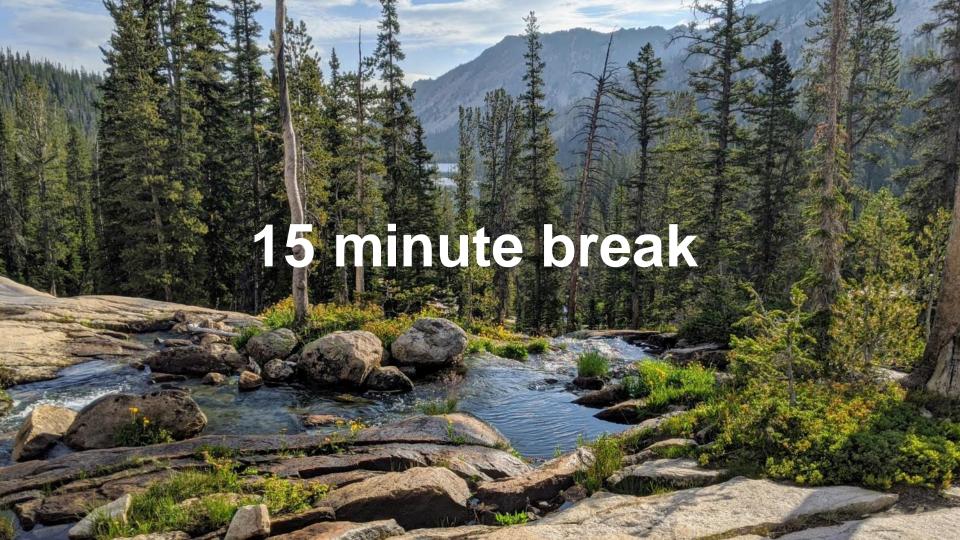
**Bonneville proposes adding a non-federal resource allowance** to the Provider of Choice contracts to provide customers with the flexibility to dedicate generating resources to offset and serve load that would otherwise be eligible to be served by federal power priced at PF Tier 1 rates.

- Proposal would allow customers to add non-federal Specified Resources up to an aggregate nameplate of 5 megawatts (MW) or 50% of their CHWM, whichever is less.
  - Would need to be a customer owned resources and connected to customers distribution system.
  - Creates potential for cost shift if BPA has to sell surplus power at less than the PF Tier 1 rate.
  - Offered in addition to customers having the choice to serve their Above-RHWM load with nonfederal resources.
  - Unspecified resources are excluded from this proposal.

# **Concept Paper Proposal**

#### Non-federal resource allowance continued:

- New generating resources would be required to be included in contract and be designated as dedicated resources.
- New resources added up to the aggregate nameplate limit would not require
  Resource Support Services (RSS) but would be subject to any additional capacity
  costs created by the addition of such resources.
- Provide customers flexibility to add new generating resources while ensuring BPA has visibility.





# Non-federal Resources: CHWMS and Future Requirements

Kevin Farleigh, Power Account Executive

## **Overview**

- Customer Resources in CHWM calculations for Regional Dialogue
- Provider of Choice Concept Paper proposal
- Questions for Discussion
- Additional considerations



# **CHWM Resources for Regional Dialogue**

#### From July 2007 Long-Term Regional Dialogue Final Policy:

"To calculate customer HWM amounts, BPA will use the **FY 2010 resource amounts** as of **September 30, 2006**, identified in the customer's Subscription contracts but with specific adjustments that BPA believes are responsive to customer comments on this issue. FY 2010 resource amounts will be used because they are known and certain, which provides stability and predictability for the HWM calculation. The exceptions to the use of these amounts are listed below."

Exceptions included: Treatment of Centralia, Hydro recalled by Grant PUD, Raft River Annexation Adjustment, Public Utility Regulatory Policies Act (PURPA) resources, and New Renewables.

## **CHWM Resources for RD**

# September 2008 - Closeout Summary: Clarification on the Use of Customer Resource Amounts for High Water Mark Calculations

- Addressed discrepancies in the Subscription contracts Exhibit C FY 2010 resource numbers.
   The document laid out criteria to address the discrepancies.
  - 1. Known resource changes not reflected in the September 30, 2006, Exhibit C, but with contemporaneous written evidence of the resource changes prior to September 30, 2006.
  - 2. Missing resource amounts will be determined using information that was available as of September 30, 2006.
    - a. Resources less than 1.0 megawatt in nameplate capacity will not be counted.
    - b. Where multiple customers have specific shares of the same resource, FY 2010 resource amounts were made consistent for those customers.
  - 3. No double-counting of resources and other clarifications.
- Final customer resource amounts were included in Attachment C of the Tiered Rate Methodology.

# **Concept Paper Proposal**

# Concept Paper Section 4.2.3.1 (Non-federal Resource Treatment in CHWM calculation)

- Bonneville proposes that any non-federal resources dedicated to load as of September 30,
   2026, would be applied to serve a customer's load and reduce its CHWM.
- These would be considered "existing resources" for the Provider of Choice contract term.
- Under Bonneville's proposal, new resources added after September 30, 2026, would be added to offset Above-RHWM load growth, unless it adopts the non-federal resource flexibility proposal outlined in Section 4.2.4.



#### **CHWM Resources: Questions and Considerations**

Bonneville will continue to administer the net requirements calculation according to its statutory guidance.

 However, non-federal resource treatment for purposes of determining a CHWM could be treated differently.

In Provider of Choice workshops and related conversations, as well as in written feedback received to date, participants have raised a number of questions and considerations around customer non-federal resources and their application in the Provider of Choice CHWM calculation.

# **Unspecified Resource Approach**

In the October 12, 2022 workshop, Bonneville clarified that currently dedicated Unspecified Resources (approximately 250 aMW) will not be assumed as continuing to serve load under Provider of Choice contracts.

Bonneville is clarifying its proposal: Bonneville will not include Unspecified Resources in the Provider of Choice CHWM calculation.



## **Question #1**

# How should "New Specified Resources" be handled in the CHWM calculation?

### **Considerations:**

- These are Dedicated, Specified resources (less than 25 aMW including SNEERs) that will
  continue to be applied to serve Total Retail Load in Provider of Choice contracts. Including
  them (thereby reducing a customer's CHWM) maintains consistency with an updated "Net
  Requirements" snapshot.
- This would be a different treatment than Unspecified resources that were used to serve load during the Regional Dialogue contract term.
- Including them could be a disincentive for further investment in Specified resources between now and the future benchmark year.\*

<sup>\*</sup> These scenarios may be unlikely given the few remaining election opportunities to apply New Specified resources prior to 2026.

## Question #2

# What year should be used to establish non-federal resource amounts for CHWM calculations? FY 2026? Or an earlier/later year?

### **Considerations:**

- Using an earlier year would more closely follow the approach in Regional Dialogue (e.g. 2026 resource amounts as of September 30, 2022).
- Using an earlier year promotes planning certainty.
- Using a later year may introduce disincentives for investment in new resources unless those new resources are removed from the calculation.
- As with Regional Dialogue, a process may be needed to clarify CHWM resource data. The Provider of Choice schedule would need to account for this.

## **Question #3**

For the CHWM calculation, what resource amounts should be used when future amounts for a specific resource are known to be different than those in the established benchmark year (e.g. FY 2026 or an earlier year)?

### **Considerations:**

- An example is where BPA has consented to allow a customer a full or partial reduction of a resource starting October 1, 2028.
- Another example is where a Specified contract resource is known to expire after the term of Regional Dialogue (FY2029 or later).

### **Additional Considerations**

#### **Customer Resource Declaration Parameters:**

- When accounting for customer resources in new contracts, BPA may need to consider updating standards for quantities of specific resources applied to customer loads.
  - Accounting for solar, bio-mas, biogas and other resource types.
  - Consideration of energy storage.
  - Hydro resource changes.
  - Unspecified resources.
- Consider these updates for resources in CHWM calculations?

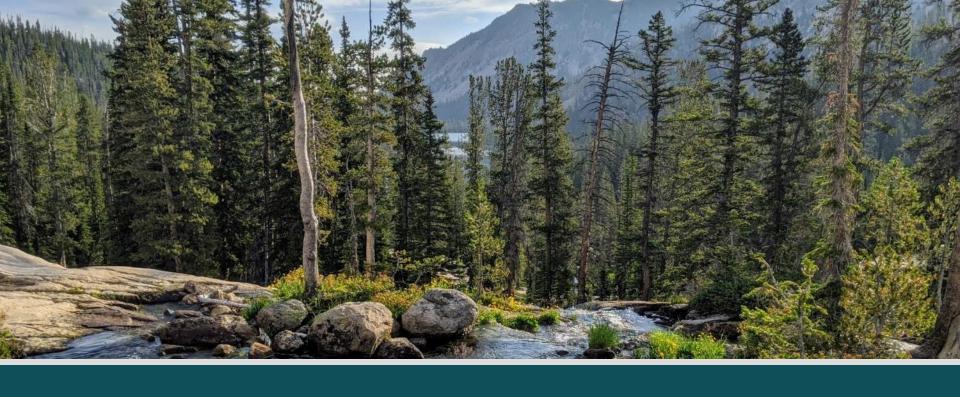
### Sections of the Revised 5b and 9c Policy:

Assuring that Policy is current with electric industry evolution and Power Contractupdates.

### **Discussion**

- Seeking feedback on these discussion topics.
- Are there additional questions or considerations?





# Schedule & Feedback

Michelle Lichtenfels, Program Manager, Provider of Choice

# Mark Your Calendar

Date	Time	Workshop Topics
December 1, 2022	9am – 12pm; Webex	Resource Acquisition Costs
December 8, 2022	9am – 4pm; BPA Rates Hearing Room and Webex	Executive Overview (1 hour) Policy Discussion
December 14, 2022	9am – 12pm; Webex	Products
2023		In planning

BPA Event Calendar: https://www.bpa.gov/learn-and-participate/public-involvement-decisions/event-calendar



## **Feedback**



# Informal comments accepted and feedback requested:

- Share feedback by November 23 to your Power AE and/or Post2028@bpa.gov with a copy to your Power AE.
- Please note that direct responses will not be provided.



# **QUESTION AND ANSWER**

# Thank You.

### **Provider of Choice Lead Sponsor:**

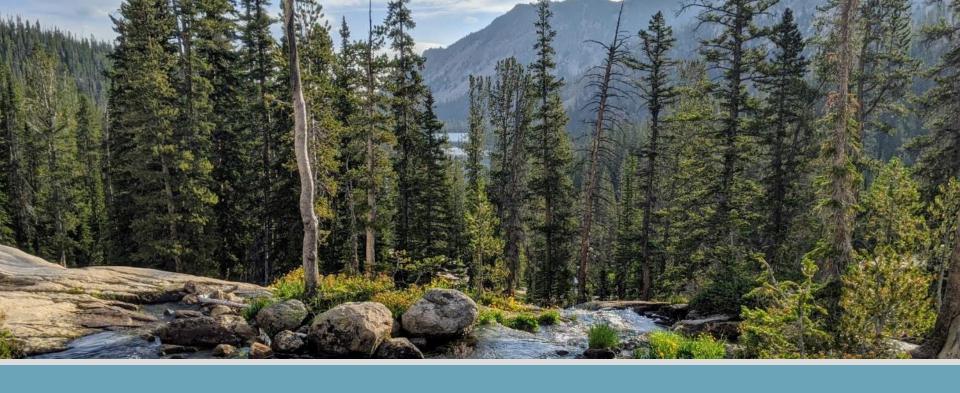
Kim Thompson, Vice President, Northwest Requirements Marketing

### **Provider of Choice Team Leads:**

Sarah Burczak, Policy Lead Kelly Olive, Contract Lead Michelle Lichtenfels, Program Manager

### **Provider of Choice Website:**

https://www.bpa.gov/energy-and-services/power/provider-of-choice



# **APPENDIX**

# APPENDIX A Existing Resource Example

#### Resource profile in Exhibit A:

Fuel Type	Date Resource	Date of	Percent of	Nameplate
	Dedicated to	Resource	Resource Used to	Capability
	Load	Removal	Serve Load	(MW)
Hydro	1979	N/A	100.0%	15.0

	Statutory Status Resource Statu		e Status	DFS or SCS?		Dispatchable?		PNCA?		If PNCA, PNCA Updates?	
5b1A	5b1B	Existing	New	Yes	No	Yes	No	Yes	No	Yes	No
X		X					X	X			
Note:	Fill in th	e table abo	ve with "7	(°s							

#### Resource amounts in Exhibit A:

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	annual aMW
	Fiscal Year 2016												
Total (MWh)	6,622	9,373	9,672	8,705	5,846	5,201	5,328	6,845	5,400	3,274	595	3,672	8.030
HLH (MWh)	3,845	4,992	5,408	4,680	3,360	3,024	3,078	3,680	3,120	1,760	346	2,040	7.982
LLH (MWh)	2,777	4,381	4,264	4,025	2,486	2,177	2,250	3,165	2,280	1,514	249	1,632	8.091

#### Resource treatment:

### Existing Resource that is Dedicated to Serve Load (in aMW)

	(**************************************
60.000	TRL
8.030	Exisiting Resource
50.000	RHWM
1.970	Above-RHWM Load
1.970	Above-RHWM Load
1.970	Tier 2 purchase from BPA
0.000	Remaining Above-RHWM Load
	· -

### **APPENDIX B**

### **New Resource - Specified Resource Example**

#### Resource profile in Exhibit A:

Fuel Type	Date Resource	Date of	Percent of	Nameplate
	Dedicated to	Resource	Resource Used to	Capability
	Load	Removal	Serve Load	(MW)
Landfill Gas	10/01/2015	N/A	100%	1.6

Stat	utory			DFS or						If PNCA, PNCA		
St	Status Resource Status		e Status	SCS?		Dispatchable?		PNCA?		Updates?		
5b1A	5b1B	Existing	New	Yes	No	Yes	No	Yes	No	Yes	No	
	X		X	X			X		X			
Note:	Note: Fill in the table above with "X"s.											

#### Resource amounts in Exhibit A:

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	annual aMW
	Fiscal Year 2016												
Total (MWh)	801	777	801	801	750	800	775	801	775	801	801	775	1.077
HLH (MWh)	465	414	448	431	431	465	448	431	448	431	465	431	1.077
LLH (MWh)	336	363	353	370	319	335	327	370	327	370	336	344	1.076

#### Resource treatment:

### New Resource that is Dedicated to Serve Load (in aMW)

TRL 60.000
RHWM 50.000
Above-RHWM Load 10.000

Above-RHWM Load 10.000
New Resource 1.077
Tier 2 purchase from BPA 8.923
Remaining Above-RHWM Load 0.000

### **APPENDIX C**

### New Resource - Unspecified Resource Amounts Example

#### Resource profile in Exhibit A:

Shape of Unspecified Resource Amounts											
	Monthly Sh	ape Choice	Diurnal Shape Choice								
Purchase Period	Total Retail Load Monthly Shape	Flat Annual Shape	HLH Diurnal Shape	Flat Within- Month Shape							
FY 2012 - FY 2014		X		X							
FY 2015 - FY 2019		X		X							
FY 2020 - FY 2024		X		X							
FY 2025 - FY 2028		X		X							

#### Resource amounts in Exhibit A:

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	annual aMW
					Fi	scal Yea	r 2016						
Total (MWh)	744	721	744	744	696	743	720	744	720	744	744	720	1.000
HLH (MWh)	432	384	416	400	400	432	416	400	416	400	432	400	1.000
LLH (MWh)	312	337	328	344	296	311	304	344	304	344	312	320	1.000

#### Resource treatment:

#### New Resource that is Dedicated to Serve Load

(in aMW)

TRL 60.000
RHWM 50.000
Above-RHWM Load 10.000

Above-RHWM Load 10.000
New Resource 1.000
Tier 2 purchase from BPA 9.000
Remaining Above-RHWM Load 0.000

