

Comments by Peter Blood of Columbia Energy Partners LLC
to
BPA's "Connecting Variable Generating Resources to the Federal Columbia River
Transmission System (FCRTS)"

1. Columbia Energy Partners LLC (CEP) supports the comments provided by Renewable Northwest Project (RNP).
2. The Bonneville Power Administration (BPA) notes in the second paragraph of the subject document that much of the wind powered generation being integrated into the BPA Balancing Authority Area (BAA) is concentrated and moves in tandem causing stresses on operation of the FCRTS. CEP believes that BPA has not fully factored in the integration of diverse sources of wind resources to be located within the BPA BAA. BPA must respond to requests by renewable / wind independent power developers and producers to fully factor in the unique attributes of specific wind project data sets to determine the impacts and benefits associated with each wind facility. In order to consider all the unique attributes of wind facilities, BPA must perform "Dynamic Rating Based on Wind Speed" studies for each wind facility.
3. BPA discusses the term "reliability" through out the subject document and references various BPA, Western Electric Coordinating Council and North American. In addition to Dispatch Standing Order 216, specify WECC and NERC protocol. Also, specify the requirements of the Clean Water Act and Endangered Species Act and impact on wind integration and system reliability in Attachment C.
4. The calculation of project specific reserve requirements are unclear in Attachment B.
5. It is unacceptable and contrary to the definition of doing a test to perform testing of dispatch order protocol and then count test violations as failures counting against a generator's three (3) violations. Violations must be suspended during testing.
6. 24 months to earn back full control of a facility is unacceptable and must be shortened substantially pending milestones met. The recommended time frame would be for either 6 months or successful passage of one test during a 6 month period.
7. BPA must provide a mechanism for facilities which are equipped with control equipment and comply with schedule protocol to be compensated for provision of reserves. In other words, if a facility is not causing costs and rather is providing a service compensation must be exchanged. BPA must also treat such proactive facilities more favorably in the LGIA language to incent cooperation and recognition of BPA's reliability responsibilities. The LGIA language is draconian and unfinanceable.

8. In Attachment A, the 85 percent reserve threshold is discussed to trigger notification to facilities. It is recommended that BPA provide several thresholds prior to 85 percent to give facilities enough advance notice to be aware that they may soon respond to a dispatch request or order from BPA. Suggested levels are 25 50 and 75 percent.
9. For those facilities which install AGC and are proactive forecasters and schedulers, a better balance of responsibilities, benefits and shared control must be reflected in the LGIA language. BPA must not order but may may dispatch requests. *BPA must compensate a facility if the facility contributes to the amount of reserves available. BPA must compensate a facility for lost revenue from curtailments. If BPA curtails then BPA must either compensate financially or return the equivalent amount of energy to the facility within the year in Attachment C.*
10. In Equation 1 in Attachment B, it is not clear how “Cj” is calculated. Please provide an example. Also, it is unclear how the “sum of C” differs from “R?”
11. In Attachment C for facilities with and without “Equipment for Direct Control,” the language in section C regarding the facility being responsible for BPA’s “stranded costs” as determined solely by BPA is unacceptable due to its wide open tenor and lack of specificity. What stranded costs is BPA referring to that might possibly be accounted for? This language as drafted is much too broad and covers the water front.
12. The language in Attachment C must reflect a more detailed plan of service for each facility recognizing factors unique to each facility and each facility’s impact to the system recognizing the facility’s wind profile as modeled against the grid. This requires that a Dynamic Rating Based on Wind Speed study for each facility. Such language must also reflect a shared control situation given that even a proactive facility armed with AGC can not anticipate every reliability concern on the BPA grid short of being controlled by BPA. In some cases, BPA’s need to control for reliability reasons may conflict with the commercial operation of the facility and BPA may curtail for a reason unrelated to the facility’s unique characteristics which were not factored into the LGIA via a unique plan of service recognizing the diverse and unique attributes of the wind facility not located in the Gorge.