

PPG Block with Shaping Analysis

June 18, 2024

Summary

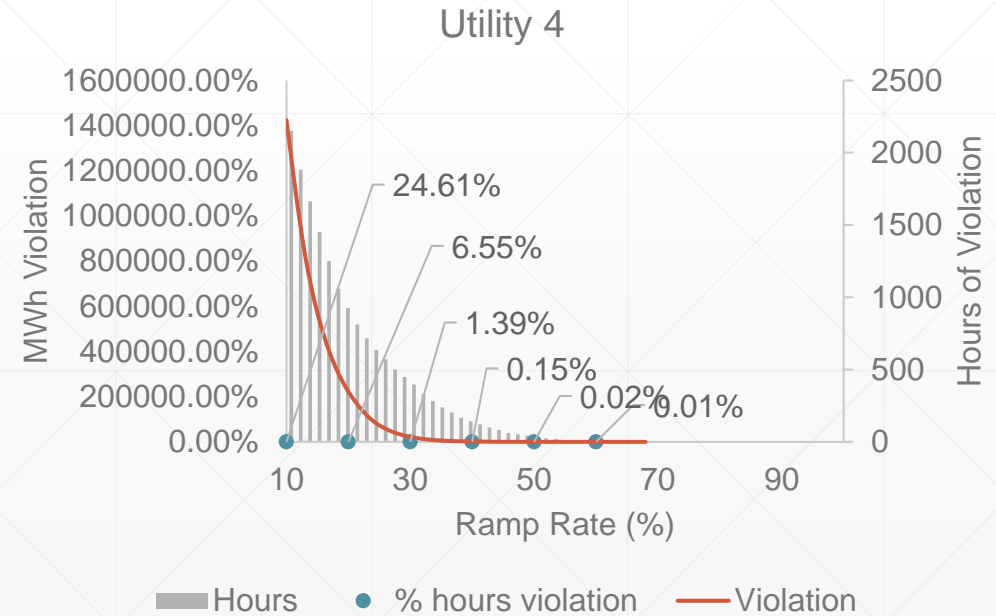
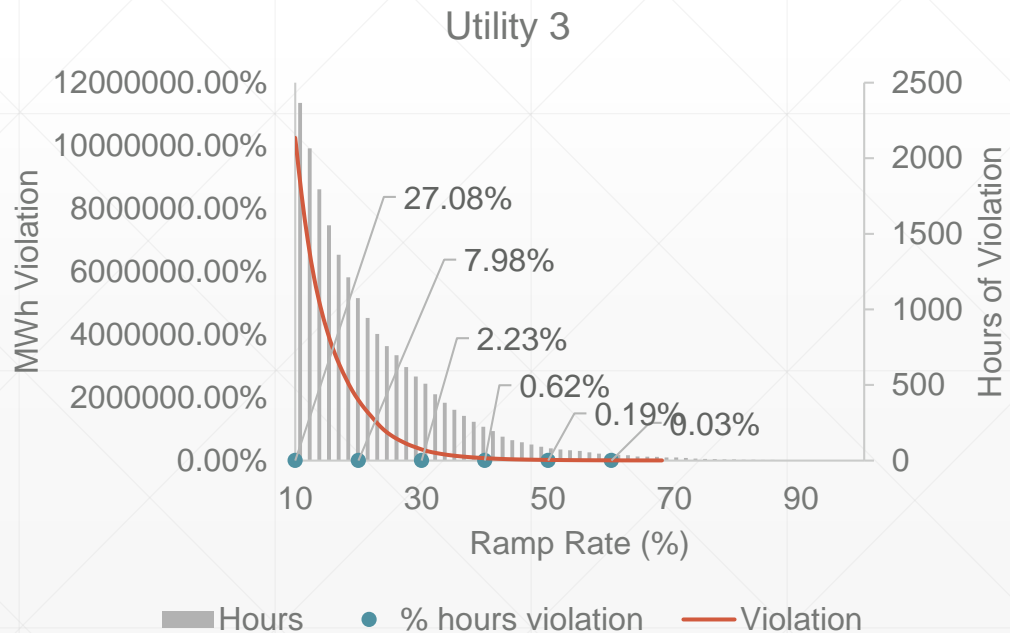
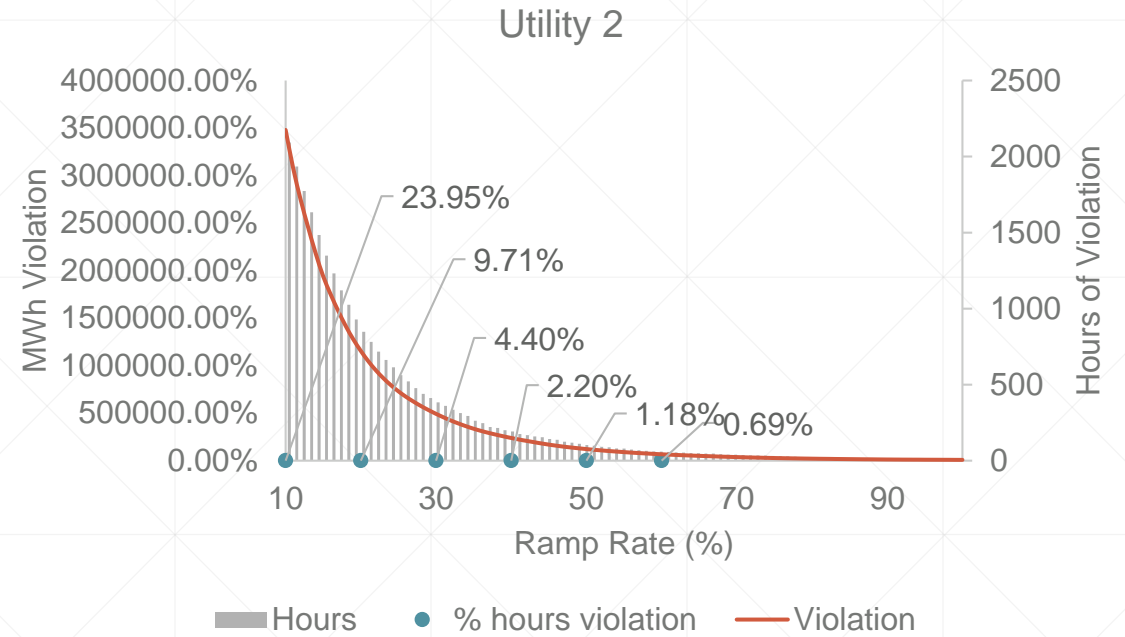
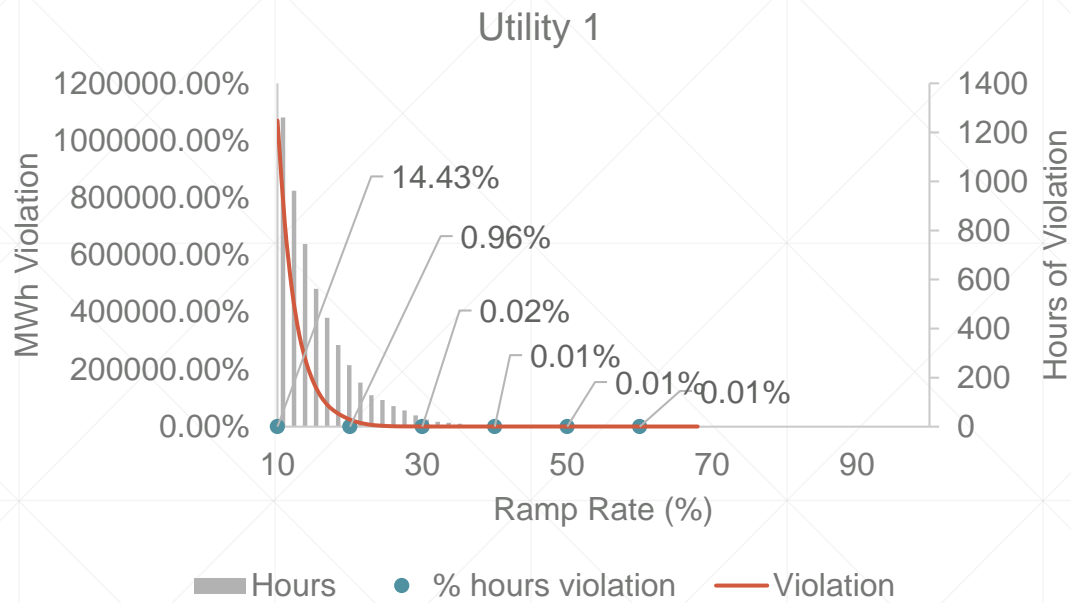
- Analysis 1: Simple Evaluation of Ramp Rate Needed to Meet Peak Load
 - Analysis 2: Evaluation Ramp Rates Needed Given Usage Constraints
 - PLVS Capacity Contribution
-

Analysis 1: Simple Evaluation of Ramp Rate to Meet Peak Load

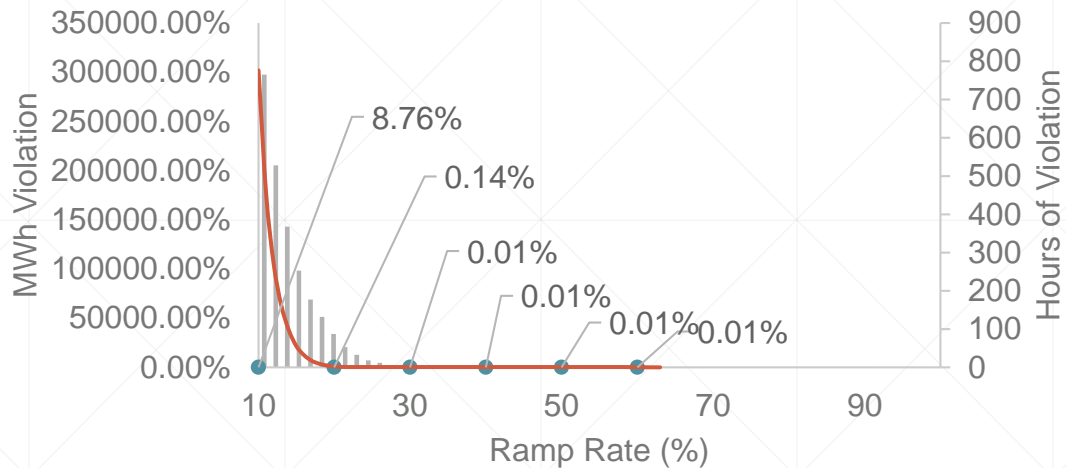
- The goal of this analysis is to evaluate at a high-level, **what ramp rate is needed to meet peak loads for each utility**
 - To evaluate this, each hour, a block schedule is created with the objective function being minimize the difference between the block schedule and requirements load (defined as FY 2023 metered load minus dedicated non-federal resource generation)
 - All product constraints are ignored other than ramp rate, so there is no consideration for monthly usage, min/max, etc.
 - Note: while this is not how the product would be used in real life, this is meant to serve as a proxy for evaluating what a sufficient ramp rate would be across a variety of utilities
-

Analysis 1: Assumptions

- Assumptions are generally based off what BPA has proposed in writing
 - All schedules are based on the PNR calculation, not the XX% Block
 - Assumed that PNR subtracts out NLSL
-

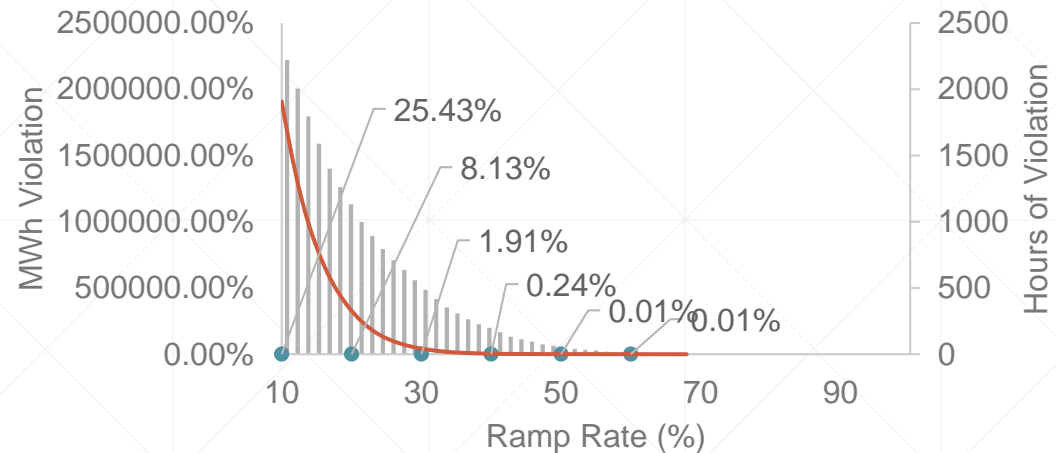


Utility 5



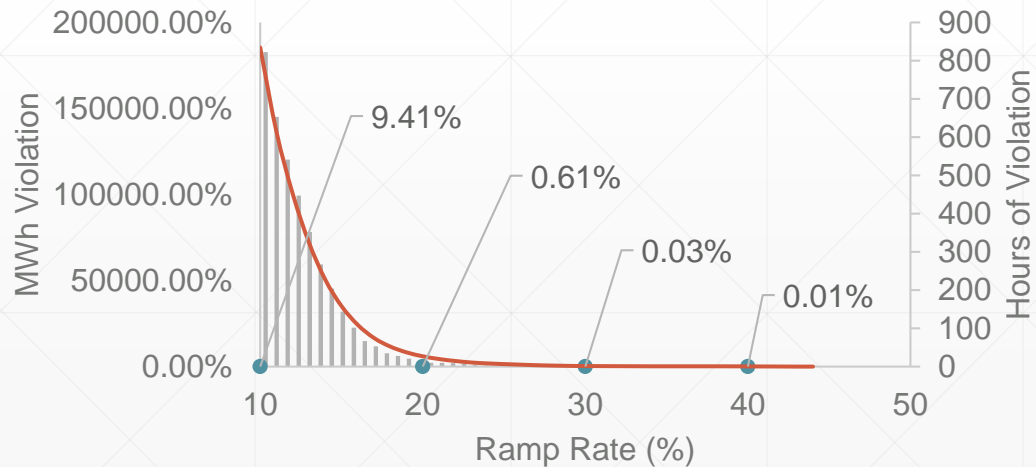
Hours % hours violation Violation

Utility 6



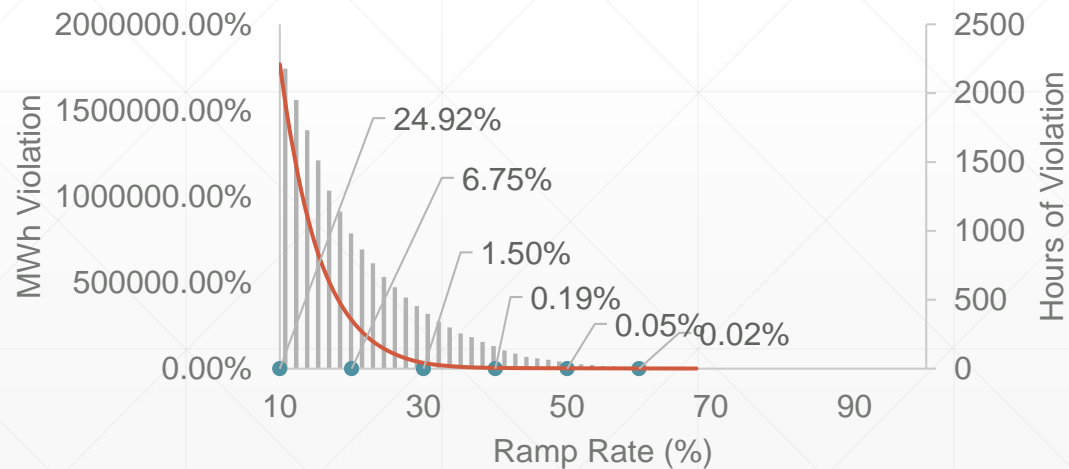
Hours % hours violation Violation

Utility 7



Hours % hours violation Violation

Utility 8



Hours % hours violation Violation

Key Takeaways

- It is generally expected that utilities with peakier loads would have more difficulty ramping up than those with relatively flat loads
 - However, given that the block shaping capacity (and ramp rates) are determined by the difference between average load and peak load, there is not a clear association between load peakiness and ability to meet peak load
 - 30% appears to be the point at which there is diminishing benefits for increasing ramp rate for most utilities
-

Analysis 2: Evaluation Ramp Rates Needed Given Usage Constraints

Analysis 2: Evaluation of Ramp Rates Needed Given Usage Constraints

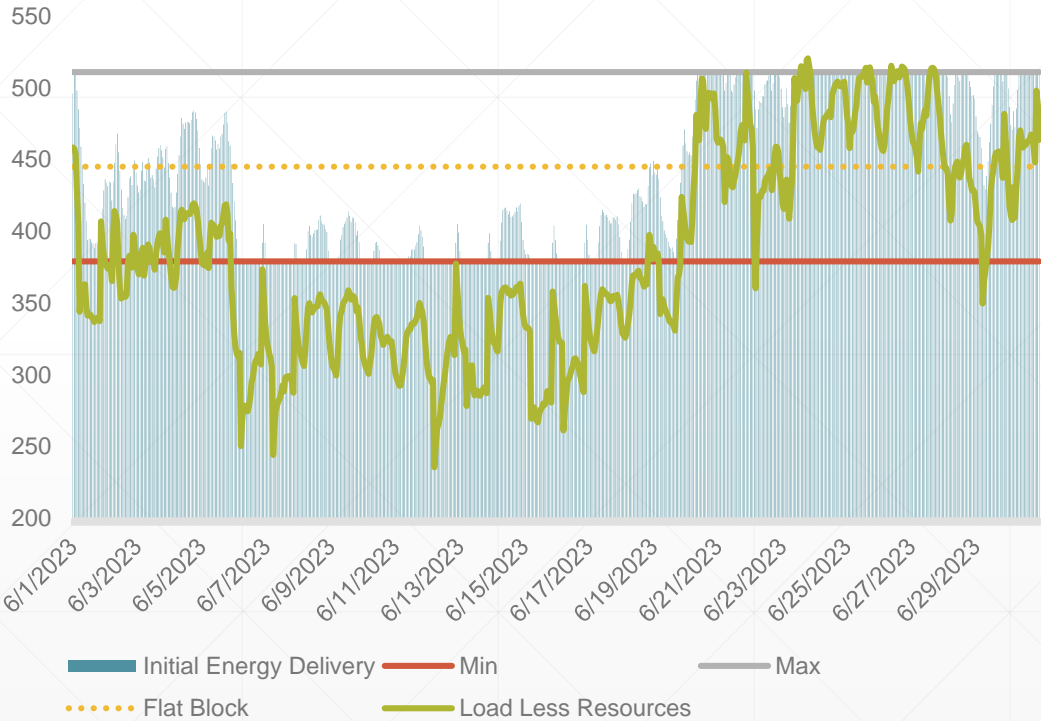
- The goal of this analysis is to evaluate **what ramp rate is needed to meet peak loads** for each utility **given feasible use of the product**
 - 26 hypothetical FY23 block schedules at 26 ramp rates are calculated for each hour with the objective function of meeting requirements offer obligation
 - The requirements offer obligation is represented by load minus non-federal resources minus AHWM load
 - To calculate the initial block schedule, requirements offer obligation is scaled to the monthly tier 1 block amount—the intent of normalization is to meet the monthly usage constraint
 - In the initial block schedule, block = normalized offer obligation UNLESS this results violating a constraint: exceeding the max or the ramp rate, or falling short of the min
 - After the initial schedule is calculated, a final schedule is recalculated to meet the 14 day 45%/55% usage constraint
 - Caveat: the final schedule does result in a very small number of ramp rate and usage violations (<.5% of block) given it is not allowed to exceed min/max and that it is adjusted to meet usage targets
-

Assumptions

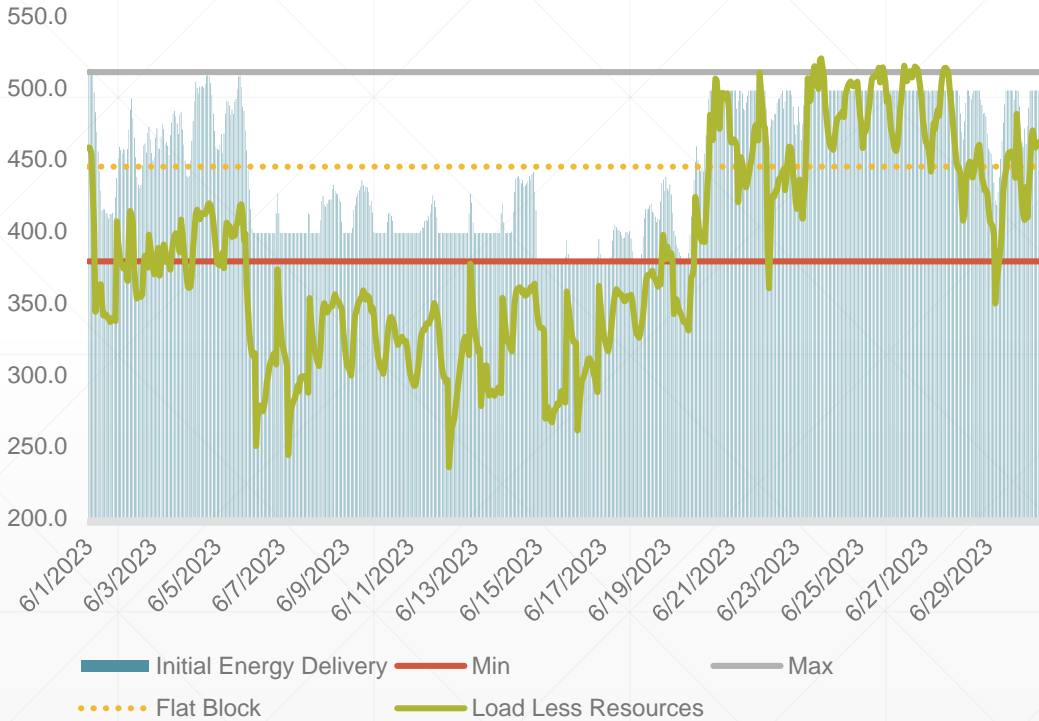
- Assumptions are generally based off what BPA has proposed in writing
 - Monthly block shape is based on 5 years of data per BPA proposal
 - **All schedules are based on the PNR calculation, not the XX% Block**
 - The Min block % is the lesser of flat block amount minus shaping capacity and 60% of Block
 - Assumed that PNR subtracts out NLSL
 - Assumed PNR subtracts out WRAP QCC of dedicated resources, and capacity contribution is estimated for non-WRAP months
 - Used either FY 2023 or 2024 Net Requirements Data
 - RHWM, TRL Forecast, TRL Peak, Resources, NLSL, etc.
-

Example of Hourly Schedule @ 20% Ramp Rate

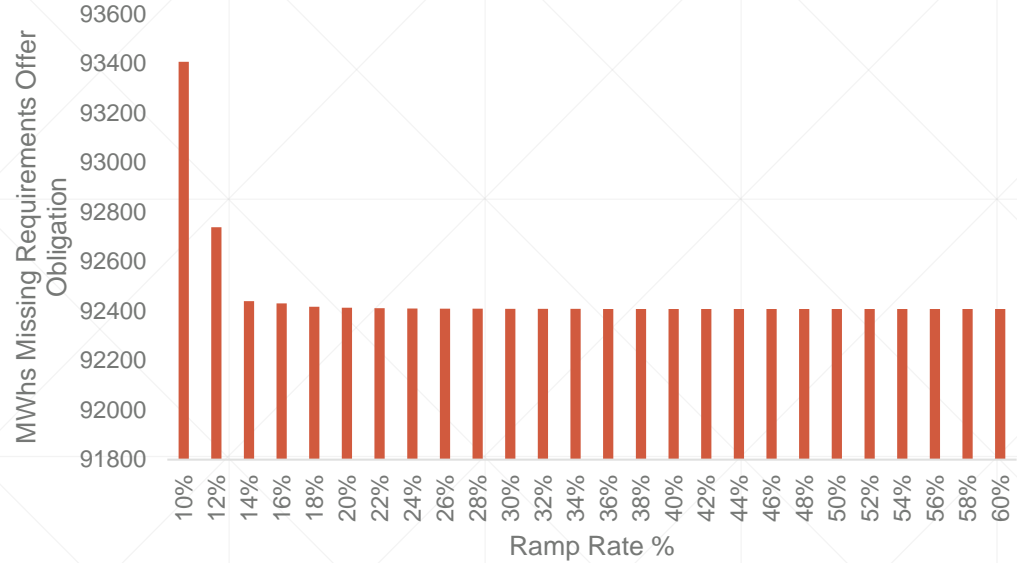
Initial Schedule – No 14 Day Usage Constraint



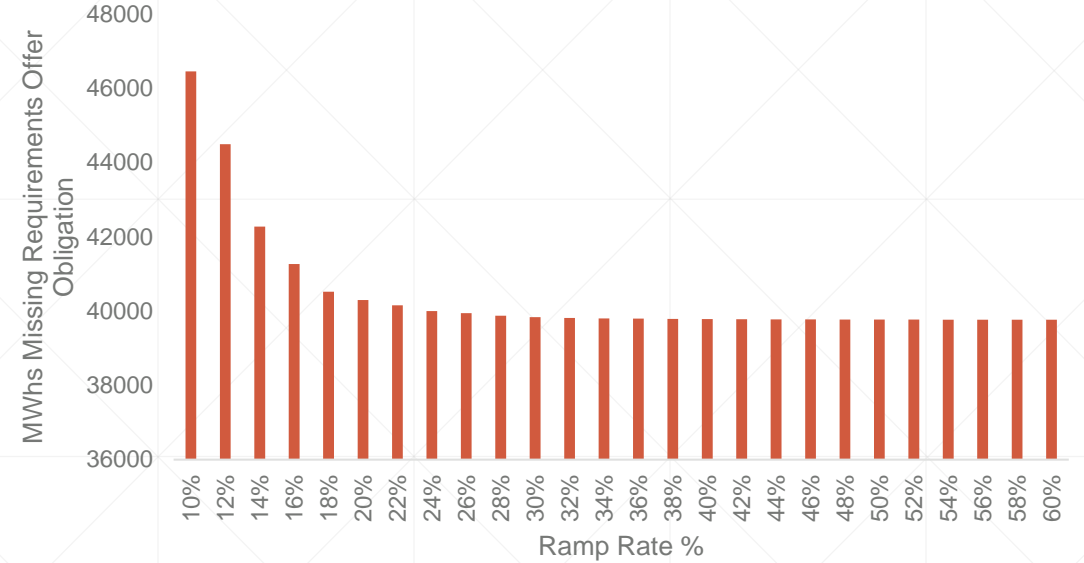
Final Schedule – w/ 14 Day Usage Constraint



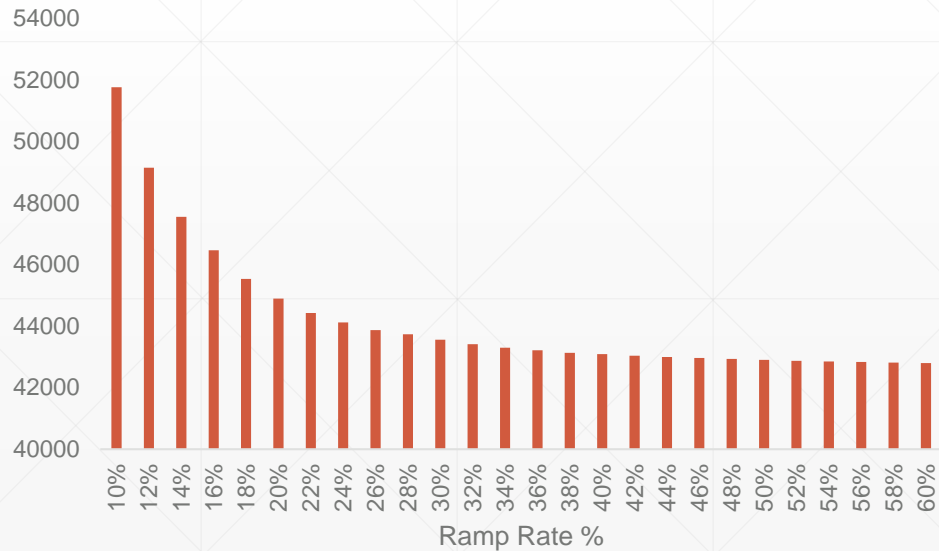
Utility 4 – w/ Usage Constraints



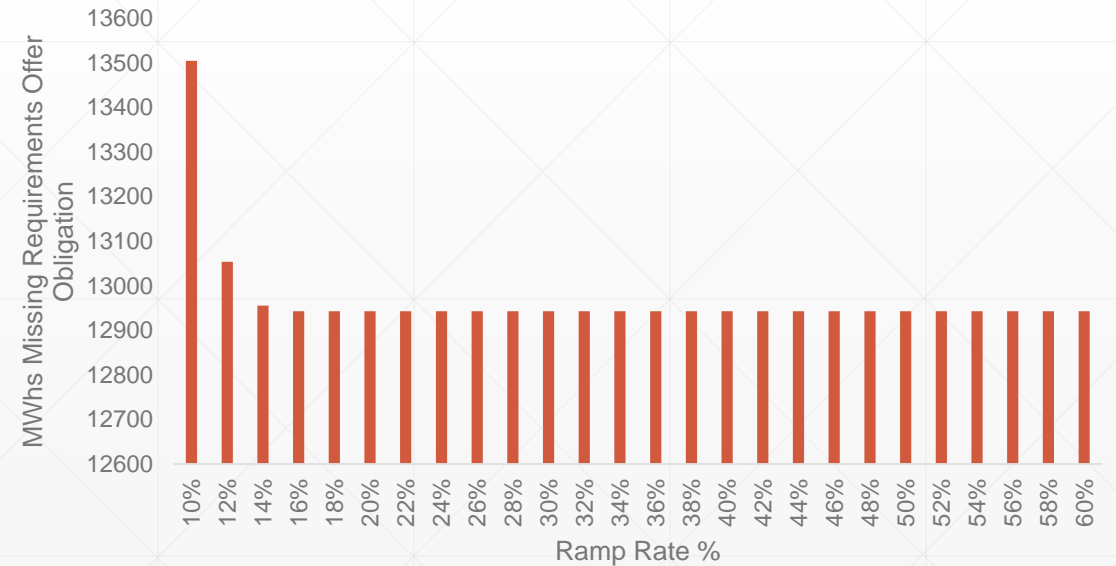
Utility 8 - w/ Usage Constraints



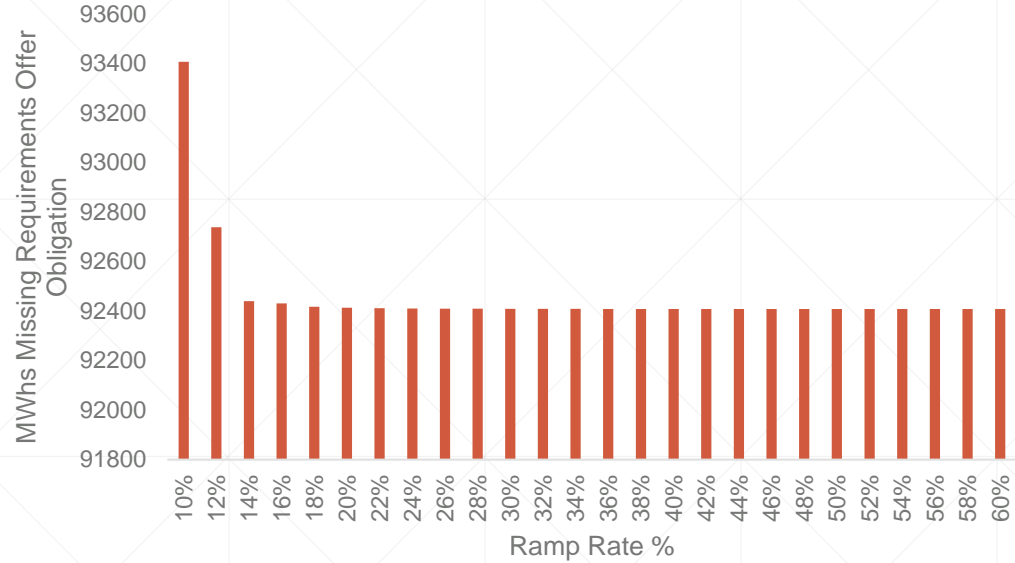
Utility 2 – w/ Usage Constraints



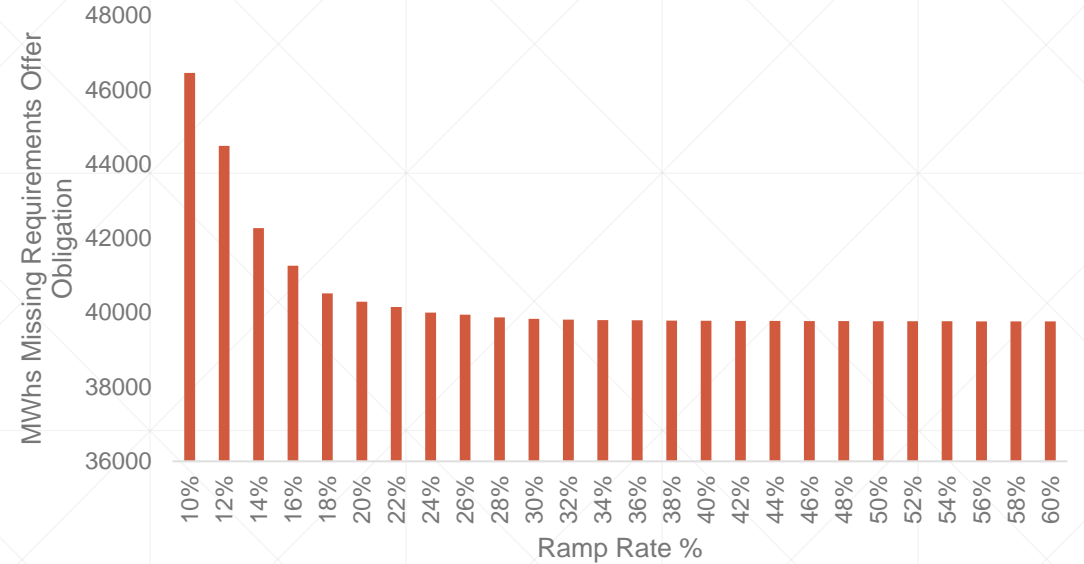
Utility 5 – w/ Usage Constraints



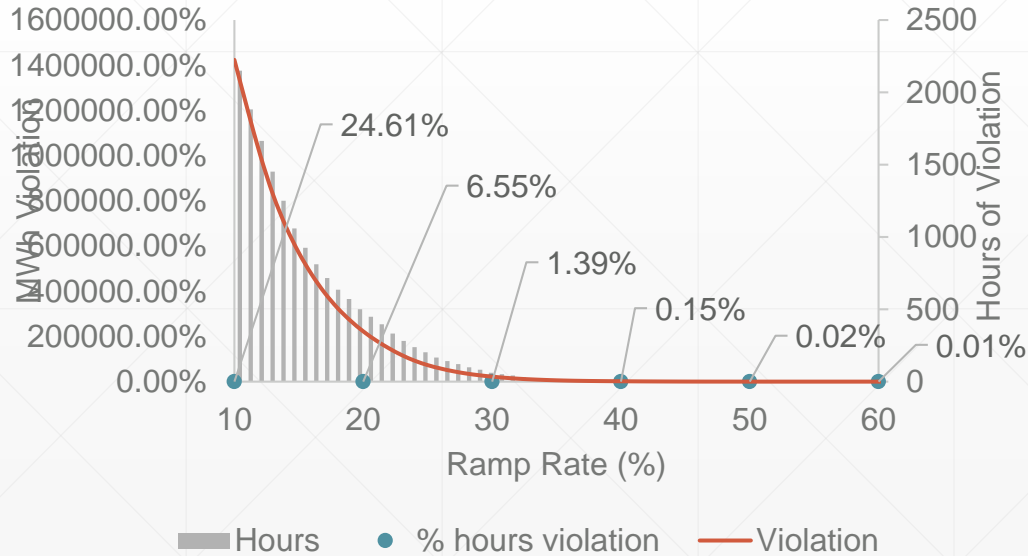
Utility 4 – w/ Usage Constraints



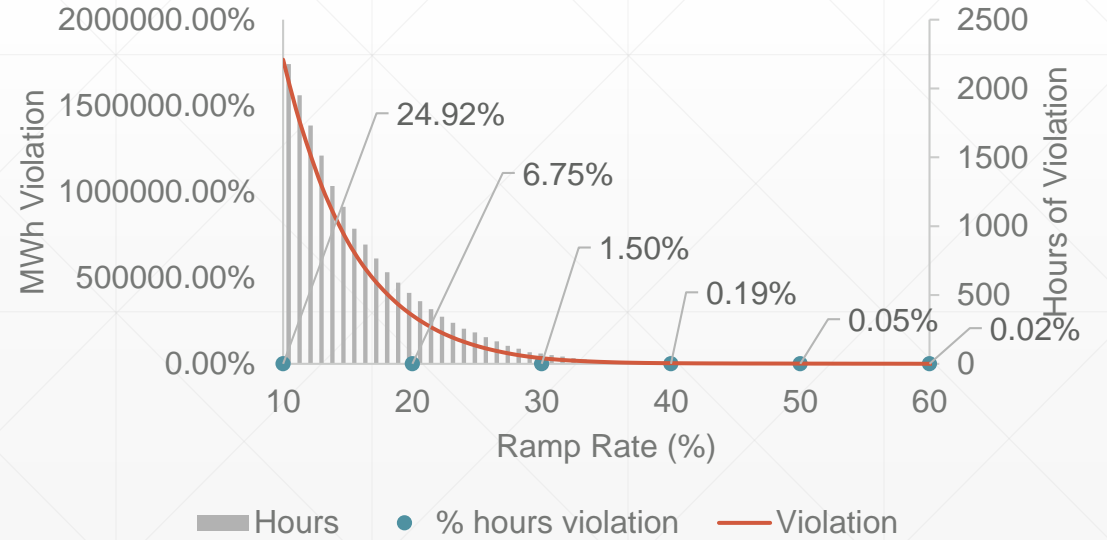
Utility 8 - w/ Usage Constraints



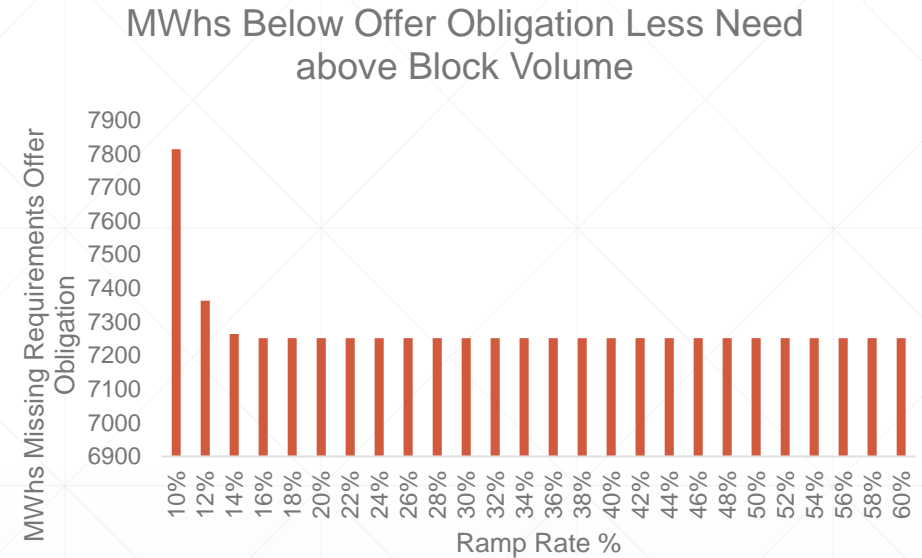
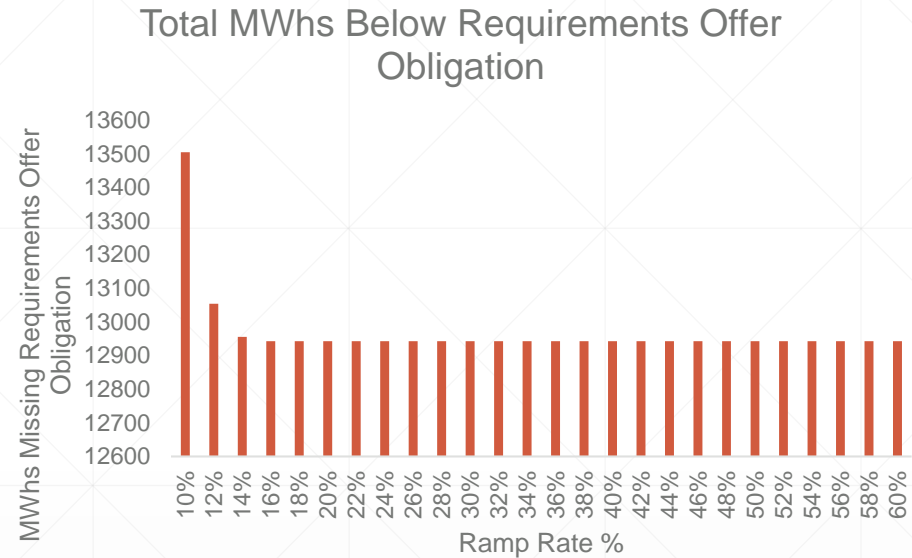
Utility 4 – No Usage Constraints



Utility 8 – No Usage Constraints



Utility 5 MWhs Below Requirements Offer



- In some months, the total requirements load is greater than the block volume.
- However, even when this is accounted for, there is still no change in the shape of benefit with ramp rate
- Notably, the requirements obligation miss appears to occur largely in months where the schedule was adjusted to meet the 14-day usage constraint

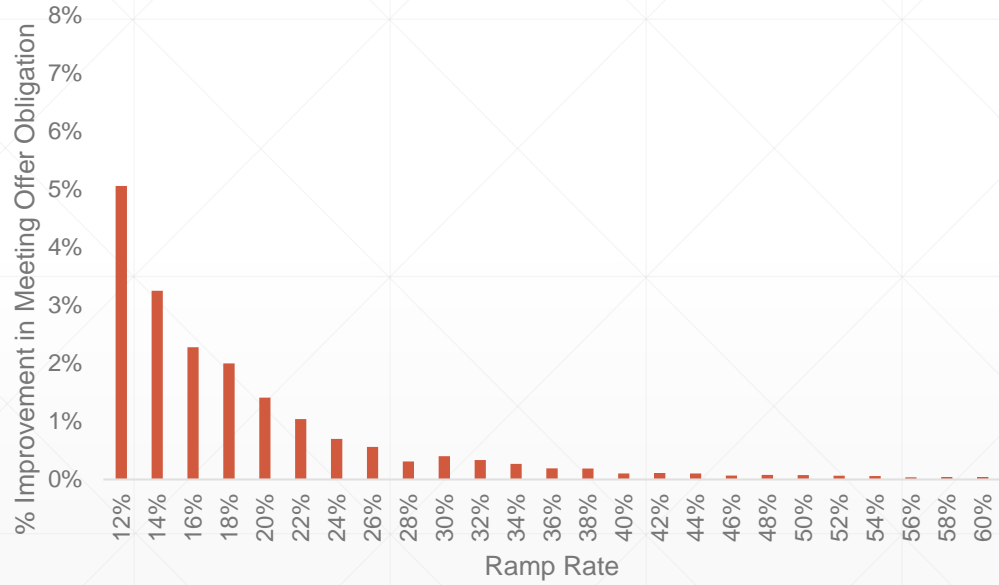
14 Day 45% / 55% usage

- While this analysis was completed with perfect foresight, in real life, limiting the use of block in 1 half of the month is prudent risk management
- However, the 45%/55% limitation is based on the first 14 days of the month
- 14 days is not actually 50% of a month (other than non-leap year February)
- **Therefore, suggest altering the 14-day usage constraint to have a 40% lower limit based on the share of days in a 31-day month, and a 60% upper limit**

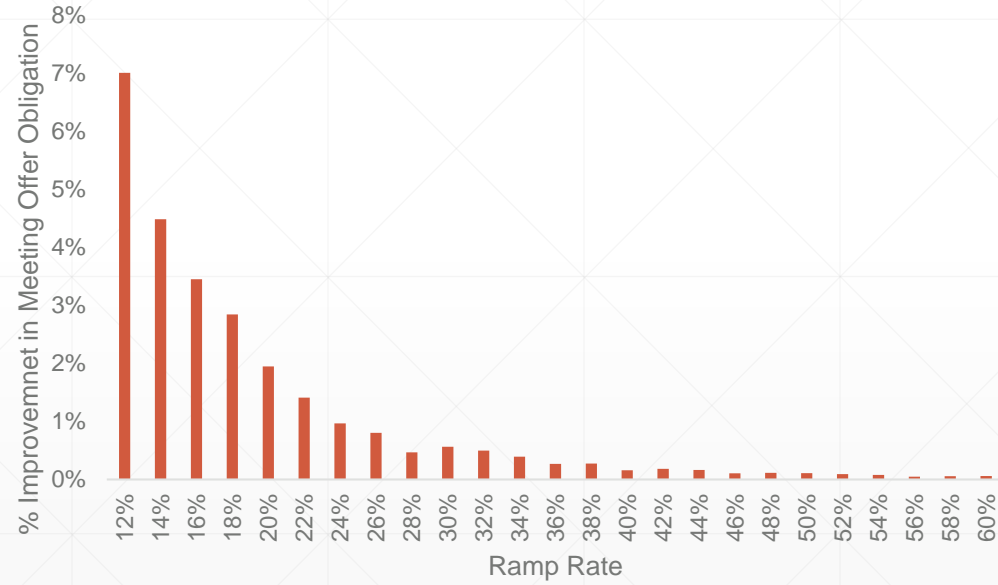
Length of month	14 Day % Share of Month	Lower Limit
31 Day Month	45%	40%
30 Day Month	47%	42%
28 Day Month	50%	45%

Impact of 45/55 Usage constraint vs. 40/60 Utility 2 Example

% Offer Obligation Improvement - 45%/55%



% Offer Obligation Improvement - 40%/60%



Key Takeaways

- Unlike in Analysis 1 where significant benefit was demonstrated with each incremental increase in ramp rate, the **benefit of increasing ramp rate diminished very quickly with additional constraints**
 - Even when controlling for requirements load exceeding block volume, the relative benefit of increasing ramp rate does not change
 - One reason that the benefit of increasing ramp rate is limited is that the 14-day usage constraint limits the amount of block used in the first half of the month, especially on the lower limit
 - **Suggest a 40%/60% 14-day usage limit**
 - Relevant for 1 utility in the analysis, another reason may be due to PNR subtracting out the WRAP QCC of hydro
 - Note: Asymmetric or seasonal ramp rates to not appear to provide significant benefit
-

Other observations: Calculation of Peak Net Requirement

- The current proposed PNR calculation subtracts out QCC of non-federal resources
 - While this works for most resources, for storage hydro, this results in a reduction of shaping capacity that is not representative of non-federal storage hydro performance
 - **Suggest that the PNR subtracts the expected volume of storage hydro rather than WRAP QCC**
 - This is also consistent with current net requirements calculation
 - This will also not cause issues in non-WRAP months
-

Analysis 3: PLVS Capacity Contribution

PLVS Capacity Contribution

- BPA has offered a Peak Load Variance Service up to P10 load
 - However, BPA has not defined P10 Load
 - PPG requests that **the definition of P10 Load will provide enough capacity to meet with utility WRAP obligations**
 - BPA also has not defined how often PLVS may be accessed
 - PPG requests that **PLVS may be offered into the Day Ahead Market as needed to meet utility offer obligations**
 - Before analysis can be conducted on the effectiveness of PLVS, the volume of PLVS offered and the application of PLVS must be defined
-