

December 31, 2021

RE: BPA's Concurrent Loss Return Service Customer Workshop

Powerex appreciates the opportunity to comment on the presentation and workshop material from December 8th, 2021 regarding the Concurrent Loss Return Service. Powerex offers the following comments for BPA's consideration:

BPA presented two options for tagging loss returns and Powerex is supportive of Option 2 - tagging losses on a separate aggregated eTag. Powerex understands from the workshop that Option 2 provides less complexity and increased accuracy over Option 1, and the inherent benefits from the aggregated approach outweigh the risks. Powerex agrees that BPA should pursue Option 2.

Powerex understands from the presentation that BPA believes that the carry forward for managing kW remainders may not be feasible, but Powerex is not quite sure why the kW remainders cannot be tracked on an hourly or daily basis. Powerex requests the BPA provide further clarification in future workshops on the reasons why the carry forward is not feasible.

Powerex also understands that there is a possibility of over collection or under collection of losses as a result of rounding concerns. Powerex has observed other transmission providers that employ a "round and carry forward" method that limits the overall loss return imbalances. BPA should explore options to track imbalances and afford the customer the option to return those imbalances in the subsequent hour following the occurrence. In cases where there is an over collection in a particular hour, the customer should be afforded the ability to reduce the loss delivery in the subsequent hour. This would also help resolve any concerns related to reliability adjustments or dynamic schedules causing imbalances, and the difficulty in managing those imbalances in a real time environment. The customer's obligation should be to return the loss obligation to the posted amount on the CDE and if there are any adjustments required for imbalances that those be tracked and managed on an hourly or daily basis to ensure adequate delivery to BPA.

Thank you kindly for considering our comments.

Sincerely,

Raj Hundal
Director, Market Policy and Practices