

**2010 WHOLESALE POWER AND TRANSMISSION
RATE ADJUSTMENT PROCEEDING**

**Errata to the Direct Testimony of Gerald G. Froese,
Justin Sharp and Melissa A. Seymour
Submitted on Behalf of Iberdrola Renewables, Inc.**

**WP-10-E-IR-01-E1
TR-10-E-IR-01-E1**

1. On Page 3, lines 12-17, insert the following new attachments to the table of contents:

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

ATTACHMENT G – DATA REQUEST RESPONSE IR-BPA-2

ATTACHMENT H – DATA REQUEST RESPONSE IR-BPA-9

ATTACHMENT I – DATA REQUEST RESPONSE IR-BPA-3

ATTACHMENT G – DATA REQUEST RESPONSE IR-BPA-7

2. On page 8, line 16, insert the words “attached as Attachment F” after “DR Response IR-BPA-01.”
3. On page 11, line 10, delete the words “Curtailed to 350 MWh” and insert the words “Curtailed to 550 MWh.”
4. On page 16, line 22, insert the words “attached as Attachment G” after “DR Response IR-BPA-2.”
5. On page 29, line 23, insert the words “attached as Attachment H” after “DR Response IR-BPA-9.”
6. On page 33, line 16, insert the words “attached as Attachment I” after “DR Response IR-BPA-3.”
7. On page 34, line 15, insert the words “attached as Attachment J” after “DR Response IR-BPA-7.”
8. On page 44, in the table beginning on line 3, delete the word “East” and insert the word “West.” On the same line in that table, delete the word “West” and insert the word “East.”
9. Insert a new attachment at pages 48-53, with the attached document labeled “Attachment F.”

10. Insert a new attachment at page 54, with the attached document labeled
“Attachment G.”
11. Insert a new attachment at pages 55-56, with the attached document labeled
“Attachment H.”
12. Insert a new attachment at page 57, with the attached document labeled
“Attachment I.”
13. Insert a new attachment at page 58, with the attached document labeled
“Attachment J.”

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

DATE RECEIVED: Friday, February 27, 2009

DIRECTED TO: Bonneville Power Administration

REQUESTOR'S NAME: Lara Skidmore

AGENCY: Iberdrola Renewables

EXHIBIT: TR-10-E-BPA-07

PAGE(S): 7

LINE(S): 2-4

DATA REQUEST:

Please provide support for the statement “[i]n recent years, BPA-TS has observed large and persistent scheduling deviations from generation in the BPA Balancing Authority Area.”

RESPONSE:

The statement referenced above is based on BPA staff’s experience and judgment with variable generation in the BPA Balancing Authority Area. The attached file (IR-BPA-1_TR-10-#-07.xls) contains the BPA-TS analysis for the period October 2008 through January 2009 showing the potential amount of Intentional Deviation based on the proposed definition in the TR-10 Initial Proposal (see TR-10-E-BPA-02, p. 88). The “Intentional Deviation Summary” sheet depicts the amount of MWh that may be subject to the proposed definition of Intentional Deviation (see Id.), by generator, for each month. The summary sheet also includes a “Wind Fleet Imbalance Summary” which shows the maximum and average hourly combined deviation for all wind plants. The other tables contain data on the number of hours where BPA-TS observed schedule deviations that exceeded the greater of 15% of the schedule or 20 MW for specific months.

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1**Intentional Deviation Summary**

MW-hours potentially subject to ID

Station	Oct-08	Nov-08	Dec-08	Jan-09
1	1,254.2	1,126.5	1,166.4	686.0
2	3,811.8	6,049.1	4,620.5	4,103.5
3	0.0	0.0	0.0	0.0
4	203.3	105.9	0.0	174.8
5	1,015.4	700.2	602.6	1,027.4
6	0.0	0.0	0.0	0.0
7	615.8	419.6	935.6	608.0
8	4,771.3	4,931.4	5,424.1	6,961.2
9	411.9	252.0	0.0	696.5
10	209.6	104.4	0.0	88.8
11	156.8	127.0	1,232.5	250.3
12	5,408.4	5,395.5	4,461.0	4,804.2
13	418.8	854.1	2,175.2	1,016.3
A	509.8	455.3	0.0	0.0
B	0.0	0.0	0.0	0.0
C	0.0	0.0	0.0	0.0
D	0.0	0.0	0.0	0.0
E	0.0	0.0	0.0	0.0
F	0.0	0.0	0.0	0.0
Total	18,787.0	20,521.0	20,617.9	20,417.0

Wind Fleet Imbalance Summary

MWs

Max +	604.8	834.0	570.1	526.9
Max -	-450.3	-401.1	-778.2	-699.9
Avg +	33.5	42.8	38.0	30.9
Avg -	-30.5	-29.9	-37.9	-31.4
Overall Avg	3.0	13.0	0.2	-0.5

Note: Stations 1-13 are Wind Generators. A-F are Thermals.**Intentional Deviation Criteria**

Negative deviation for 3 or more consecutive hours or positive deviations for 3 or more consecutive hours, if the deviation exceeds the greater of 15% of the schedule or 20 MW for each hour.

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

Consecutive Hours with deviations greater than 15% or 20MW for January 2009																20MW for January 2009								
Count of Imbalance	-15	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8
Station																								
1													3	14	35	638	36	14	3	1				
2										1	2	4	9	19	43	563	51	26	12	6	5	2	1	
3													1	9		724	10							
4													1	7	34	674	21	6	1					
5													4	13	35	652	26	8	4	2				
6															1	743								
7													2	5	25	661	34	12	5					
8	1	1	1	1	1	1	1	2	2	2	2	4	12	28	40	537	46	30	15	9	4	2	1	1
9													2	11	33	649	32	12	5					
10														3	10	718	8	4	1					
11													2	6	25	678	21	12						
12										1	3	7	13	26	47	567	42	20	10	5	2	1		
13													3	7	17	668	24	13	5	4	1	1	1	
A																742	1	1						
B																744								
C															2	741	1							
D																740	4							
E																742	2							
F															1	742	1							
Grand Total	1	1	1	1	1	1	1	2	2	4	7	15	51	140	357	12923	360	158	61	27	12	6	3	1

MW-Hours for consecutive deviations for January 2009																MW-Hours for consecutive deviations for January 2009									Grand Total
Station	-15	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	
1													97.3	162.9	106.8	0.0	87.9	105.8	85.6	39.7					686.0
2										49.0	78.4	181.9	444.3	562.3	390.9	0.0	519.7	735.4	579.9	272.3	207.0	54.4	28.1		4,103.5
3														0.0	0.0	0.0	0.0								0.0
4													40.6	23.5	26.4	0.0	36.4	27.2	20.7						174.8
5													163.1	127.3	181.6	0.0	162.8	169.4	170.7	52.5					1,027.4
6															0.0	0.0									0.0
7													56.6	88.0	67.1	0.0	116.6	130.2	149.5						608.0
8	86.6	101.3	69.0	82.0	74.5	89.9	81.0	195.0	187.7	174.8	134.1	205.7	764.5	953.1	620.9	0.0	744.8	931.5	736.6	394.9	186.0	88.7	33.0	25.6	6,961.2
9													67.0	84.9	79.0	0.0	139.2	188.8	137.6						696.5
10														0.0	0.0	0.0	22.5	40.8	25.5						88.8
11													72.0	111.9	66.3	0.0	0.0	0.0							250.3
12										34.4	202.8	536.8	607.7	757.2	459.9	0.0	480.0	906.6	529.8	173.3	82.7	33.0			4,804.2
13													94.9	120.3	85.5	0.0	152.8	177.6	158.7	116.7	45.0	42.2	22.6		1,016.3
A																0.0	0.0	0.0							0.0
B																0.0									0.0
C															0.0	0.0	0.0								0.0
D																0.0	0.0								0.0
E																0.0	0.0								0.0
F															0.0	0.0	0.0								0.0
Grand Total	86.6	101.3	69.0	82.0	74.5	89.9	81.0	195.0	187.7	258.2	415.3	924.4	2,408.0	2,991.4	2,084.4	0.0	2,462.7	3,413.3	2,594.5	1,049.4	520.7	218.3	83.7	25.6	20,417.0

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

	Consecutive Hours with deviations greater than 15% or 20MW for December 2008																	Consecutive Hours with deviations greater than 15% or 20MW for December 2008																			
Count of Imbalance																		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Station	-17	-16	-15	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
1														5	6	11	36	629	38	14	4	1															
2													1	1	3	7	28	66	504	64	37	19	11	3													
3																2	11	721	10																		
4																8	42	656	30	8																	
5															2	16	69	584	56	13	2	1	1														
6																	2	739	2	1																	
7															3	6	23	669	24	9	4	3	1	1	1												
8														2	6	9	25	43	552	50	27	16	8	3	1	1	1										
9																10	27	661	36	10																	
10																4	17	711	10	2																	
11													1	1	1	1	9	26	664	14	5	4	3	1	1	1	1	1	1	1	1	1	1	1	1	1	
12													1	3	9	19	40	69	508	59	26	5	2	1	1	1											
13																9	22	640	21	16	7	2	1														
A																	1	5	732	5	1																
B																		1	743																		
C																			744																		
D																	1	3	735	3	2																
E																			741	2	1																
F																				742																	
Grand Total	1	1	1	1	1	1	1	1	1	1	1	7	12	31	59	181	486	13353	435	176	62	32	12	5	5	2	1	1	1	1	1	1	1	1	1	1	

	MW-Hours for consecutive deviations for December 2008																	MW-Hours for consecutive deviations for December 2008																			Grand Total	
Station	-17	-16	-15	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Grand Total
1														128.7	219.1	177.8	197.4	0.0	115.9	155.8	137.7	34.0															1,166.4	
2														29.7	94.6	166.1	249.9	0.0	850.6	1,060.8	893.4	509.8	124.1														4,620.5	
3																	0.0	0.0	0.0																	0.0		
4																	0.0	0.0	0.0	0.0																0.0		
5														74.1	122.4	86.7		0.0	59.4	47.9	81.7	74.2	56.2													602.6		
6																	0.0	0.0	0.0	0.0																0.0		
7																	78.0	92.6	138.5	170.8	132.9	106.1	58.7	49.3	25.5											935.6		
8														83.6	435.9	481.8	483.7	0.0	767.7	1,109.0	908.5	390.0	164.8	77.7	69.7	53.3											5,424.1	
9																	0.0	0.0	0.0	0.0																0.0		
10																	0.0	0.0	0.0	0.0																0.0		
11														22.3	27.9	72.0	45.2	0.0	99.5	155.9	121.4	107.9	35.0	35.0	35.0	35.0	34.8	34.4	34.8	35.0	49.5	34.8	35.0	29.3	27.7	32.4	1,232.5	
12														68.8	161.3	371.6	813.5	0.0	346.2	454.9	378.1	95.9	39.4	30.8	24.6											4,461.0		
13														21.4	22.3	24.3	22.2	0.0	185.0	287.8	261.5	53.6	41.6														2,175.2	
A																	0.0	0.0	0.0	0.0																0.0		
B																	0.0	0.0	0.0	0.0																0.0		
C																	0.0	0.0	0.0	0.0																0.0		
D																	0.0	0.0	0.0	0.0																0.0		
E																	0.0	0.0	0.0	0.0																0.0		
F																	0.0	0.0	0.0	0.0																0.0		
Grand Total	21.4	22.3	24.3	22.2	27.9	43.7	33.0	22.4	36.2	38.1	37.5	249.5	528.0	1,414.8	2,333.4	2,781.8	2,008.3	0.0	2,591.0	3,479.0	2,964.5	1,418.9	560.7	222.7	180.5	88.3	35.0	34.8	34.4	34.8	35.0	49.5	34.8	35.0	29.3	27.7	32.4	21,533.0

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

Consecutive Hours with deviations greater than 15% or 20MW for November 2008																	
Count of Imbalance																	
Station	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9
1					3	13	43	602	33	17	6	3	1				
2			1	3	7	22	48	507	55	31	23	13	4	3	2	1	1
3							8	707	5								
4					1	7	35	642	28	8							
5				1	2	14	48	603	36	10	4	3					
6							1	720									
7					2	8	18	642	31	16	2	1	1				
8				2	8	20	42	528	54	32	16	10	5	2	1	1	
9				1	1	9	30	649	24	6	1						
10					1	2	10	704	4								
11				1	1	5	20	672	16	6							
12	1	1	1	5	14	37	69	490	59	28	9	6	1				
13			1	1	1	6	14	647	28	13	6	2	1	1			
A						1	4	712	2	1	1						
B						1	1	717	2								
C							2	715	3	1							
D							1	719	1								
E							2	718	1								
F							3	715	3								
Grand Total	1	1	3	14	41	146	399	12409	385	169	68	38	13	6	3	2	1

MW-Hours for consecutive deviations for November 2008																		
Station	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9	Grand Total
1					147.7	74.0	73.2	0.0	199.4	285.1	234.7	87.4	25.0					1,126.5
2			24.8	80.7	337.5	294.7	245.8	0.0	1,220.3	1,424.5	1,259.4	587.8	182.5	140.2	117.7	76.1	57.0	6,049.1
3						0.0	0.0	0.0	0.0	0.0	0.0							0.0
4					41.1	42.2	22.6	0.0	0.0	0.0								105.9
5				25.5	91.5	102.3	2.5	0.0	133.5	96.9	128.4	119.6						700.2
6							0.0	0.0										0.0
7					55.4	79.3	44.1	0.0	52.7	61.5	79.5	23.4	23.8					419.6
8				117.1	424.9	436.2	299.0	0.0	842.8	980.3	929.1	546.8	191.5	76.3	44.0	43.4		4,931.4
9				50.0	31.3	58.9	33.3	0.0	33.5	20.6	24.4							252.0
10					38.9	35.0	30.5	0.0	0.0									104.4
11				31.9	37.0	32.1	26.0	0.0	0.0	0.0								127.0
12	132.9	129.9	169.0	304.1	1,130.6	1,332.5	585.3	0.0	519.5	478.5	399.7	187.4	26.1					5,395.5
13			23.4	25.0	23.3	36.0	47.5	0.0	181.4	246.2	168.2	53.3	25.0	24.8				854.1
A						0.0	0.0	0.0	201.0	174.3	80.0							455.3
B						0.0	0.0	0.0	0.0									0.0
C						0.0	0.0	0.0	0.0	0.0								0.0
D						0.0	0.0	0.0	0.0									0.0
E						0.0	0.0	0.0	0.0									0.0
F						0.0	0.0	0.0	0.0									0.0
Grand Total	132.9	129.9	217.2	634.3	2,359.2	2,523.2	1,409.8	0.0	3,384.1	3,767.8	3,303.4	1,605.7	474.0	241.3	161.7	119.5	57.0	20,521.0

ATTACHMENT F – DATA REQUEST RESPONSE IR-BPA-1

	Consecutive Hours with deviations greater than 15% or 20MW for October 2008																						
Count of Imbalance																							
Station	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9
1											5	11	33	634	41	10	6	3	1				
2					1	2	3	3	3	3	8	26	46	558	50	23	15	2	1				
3													7	728	8	1							
4											1	9	32	664	31	5	1	1					
5										1	5	16	50	616	42	11	3						
6														744									
7												5	26	663	31	11	5	2	1				
8									1	4	6	22	52	536	57	31	16	8	5	3	1	1	1
9											3	9	28	663	30	9	1	1					
10										1	2	6	14	707	11	3							
11												7	20	693	18	4	2						
12		1	1	1	1	1	1	2	3	11	14	31	58	525	52	25	13	2	1				
13												1	18	682	29	9	4	1					
A											1	1	9	724	8	1							
B														744									
C													1	743									
D														742	1	1							
E														744									
F													2	740	2								
Grand Total	1	1	1	1	2	3	4	5	7	20	45	144	396	12850	411	144	66	20	9	3	1	1	1

	MW-Hours for consecutive deviations for October 2008																							
Station	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9	Grand Total
1											224.5	135.2	132.5	0.0	200.3	259.6	199.1	71.8	31.2					1,254.2
2					27.2	60.2	103.4	145.0	147.7	177.9	417.2	335.7	265.7	0.0	562.2	785.4	667.3	75.5	41.5					3,811.8
3													0.0	0.0	0.0	0.0								0.0
4											31.1	49.5	22.4	0.0	29.7	26.0	24.3	20.3						203.3
5										43.9	186.6	233.3	172.5	0.0	103.1	139.5	136.5							1,015.4
6														0.0										0.0
7												0.0	0.0	0.0	166.5	188.4	157.0	65.3	38.5					615.8
8									46.1	197.0	253.0	327.6	180.3	0.0	704.7	1,026.1	1,065.1	421.9	275.7	142.9	50.8	59.5	20.6	4,771.3
9											104.7	114.2	83.0	0.0	21.9	33.2	28.0	26.9						411.9
10										42.6	55.3	58.3	53.4	0.0	0.0	0.0								209.6
11												0.0	0.0	0.0	48.1	55.2	53.5							156.8
12	40.0	39.4	47.2	42.8	40.5	40.3	49.9	101.6	119.6	485.1	1,022.6	856.0	391.3	0.0	762.7	863.4	428.1	55.5	22.4					5,408.4
13												0.0	0.0	0.0	121.0	130.0	132.0	35.8						418.8
A											88.0	241.5	180.3	0.0	0.0	0.0								509.8
B														0.0										0.0
C													0.0	0.0										0.0
D														0.0	0.0	0.0								0.0
E														0.0										0.0
F													0.0	0.0	0.0									0.0
Grand Total	40.0	39.4	47.2	42.8	67.7	100.5	153.3	246.6	313.4	946.5	2,383.0	2,351.3	1,481.3	0.0	2,720.2	3,506.8	2,890.9	773.0	409.3	142.9	50.8	59.5	20.6	18,787.0

ATTACHMENT G – DATA REQUEST RESPONSE IR-BPA-2

DATE RECEIVED: Friday, February 27, 2009

DIRECTED TO: Bonneville Power Administration

REQUESTOR'S NAME: Lara Skidmore

AGENCY: Iberdrola Renewables

EXHIBIT: TR-10-E-BPA-07

PAGE(S): 8

LINE(S): 14-15

DATA REQUEST:

Please provide evidence that the current 125% penalty rate for Intentional Deviations is not an effective price signal to incentivize good scheduling behavior.

RESPONSE:

BPA-TS proposes to increase the Intentional Deviation penalty rate from 125% to 150% of BPA's highest incremental cost that occurs during the day because positive or negative deviations that BPA determines to be excessive or persistent deviations (under the Intentional Deviation criteria, see TR-10-E-BPA-02, p. 88) should be subject to a rate that is higher than the normal rate charged for Deviation Band 3. Further, BPA-TS is concerned about large and persistent scheduling deviations that can adversely impact planning, scheduling, operations, and ultimately the reliability of the federal system. With growth of non-federal generators in the BPA Balancing Authority Area, BPA-TS foresees the potential for excessive or persistent scheduling deviations to result in adverse reliability impacts to the system; thus, the proposed penalty rate is designed to send an effective price signal to incentivize accurate scheduling behavior. TR-10-E-BPA-07, p. 7, lines 1-13 and p. 8, lines 9-15. BPA has no data that responds to this request.

ATTACHMENT H – DATA REQUEST RESPONSE IR-BPA-9

DATE RECEIVED: Friday, February 27, 2009

DIRECTED TO: Bonneville Power Administration

REQUESTOR'S NAME: Lara Skidmore

AGENCY: Iberdrola Renewables

EXHIBIT: Overview of Wind Integration-Within-Hour Balancing Service Rate Proposal
Testimony WP-10-E-BPA-22

PAGE(S): 23

LINE(S): 16-18

DATA REQUEST:

Please provide a complete list with associated timelines of the “steps BPA is taking to facilitate the integration of large amounts of wind generation into BPA’s BAA.”

RESPONSE:

The following initiatives and timelines are subject to change:

- I. RESERVE REQUIREMENT CALCULATIONS
 - Rerun for new load forecast 4/30/09
 - Improve Scaling Component 10/31/11
- II. FCRPS WIND STUDIES
 - Scenario analysis 5/29/09
 - Model development 5/29/09
- III. ACE DIVERSITY INTERCHANGE
 - Benefits Analysis 3/31/09
 - WECC Analysis 7/31/09
- IV. CONNECTING VARIABLE GENERATING RESOURCES TO GRID
 - Phase I requirements document 3/16/09
 - Phase II implementation 10/1/09
- V. WIND FORECASTING
 - Install 16 additional wind monitoring sites 7/31/09
 - Hour ahead wind forecast 11/30/09
- VI. DYNAMIC SCHEDULING
 - System Studies 2/26/10
 - Reservation & Scheduling design 5/1/09 – 9/30/09
 - Dispatch/Scheduling enhancement 9/1/09 – 2/26/10
 - Hourly ATC controls 9/30/09

ATTACHMENT H – DATA REQUEST RESPONSE IR-BPA-9

- Operator training 4/1/10 – 6/30/10
- Test and Evaluate 2/1/10 – 5/31/10
- Operate Pilot 6/1/10 – 10/31/11
- Regional Implementation 10/31/11
- VII. IMPLEMENT WI WITHIN-HOUR BALANCING SERVICE RATE
 - Fiscal Year 2010 Rate Period 10/01/10
- VIII. INTRA-HOUR SCHEDULING
 - Regional Implementation – Business Practices Joint Initiative 10/31/11
- IX. THIRD PARTY SUPPLY
 - Negotiate with Projects 7/31/09
 - Pilot for Projects located in BPA Balancing Authority 10/26/09 – 10/19/10
 - Pilot for projects not located in BA 10/1/10 – 9/30/11
 - Regional Implementation 10/31/11
- X. DISPATCH & SCHEDULING SYSTEMS AND TOOLS 9/30/10
- XI. WIND RELATED GRID STABILITY MITIGATION ACTIONS
 - 1200 MW sites 10/01/09
 - 1200 MW Build/Operate 2/24/10
 - Frequency responsive studies 10/1/09
 - Frequency responsive build/operate 2/24/11
 - Large-scale interconnection studies 10/1/10
- XII. I-TAP (Memorandum of Understanding offered by Joint Initiative) 8/28/09
(e.g., bulletin board to facilitate intra-hour transactions)
- XIII. LARGE STORAGE PROJECTS & NEW REGULATION FOLLOWING
Ongoing
(e.g., Pump storage and other research and development)

ATTACHMENT I – DATA REQUEST RESPONSE IR-BPA-3

DATE RECEIVED: Friday, February 27, 2009

DIRECTED TO: Bonneville Power Administration

REQUESTOR'S NAME: Lara Skidmore

AGENCY: Iberdrola Renewables

EXHIBIT: TR-10-E-BPA-07

PAGE(S): 18

LINE(S): 16

DATA REQUEST:

What would the proposed rate for Wind Integration – Within Hour Balancing Service be in \$/kW-mo. for 30 minute, 45 minute and 60 minute scheduling persistence?

RESPONSE:

Each of the Wind Integration – Within Hour Balancing Service rates below are estimates based upon the assumptions in the Initial Proposal (including the Operating Reserve forecast based on the current WECC standard for Operating Reserve). *See Klippstein et al., WP-10-E-BPA-24, Section 4, pp. 12-15:*

30 minute persistence scheduling yields a estimated rate of \$ 1.37/kW-mo

45 minute persistence scheduling yields a estimated rate of \$ 1.73/kW-mo

60 minute persistence scheduling yields a estimated rate of \$ 2.13/kW-mo

ATTACHMENT J – DATA REQUEST RESPONSE IR-BPA-7

DATE RECEIVED: Friday, February 27, 2009

DIRECTED TO: Bonneville Power Administration

REQUESTOR'S NAME: Lara Skidmore

AGENCY: Iberdrola Renewables

EXHIBIT: Overview of Wind Integration-Within-Hour Balancing Service Rate Proposal
Testimony WP-10-E-BPA-22

PAGE(S): 13

LINE(S): 6-8

DATA REQUEST:

Please explain why BPA believes it needs additional authority to require wind generators to comply with BPA reliability and operational requirements.

RESPONSE:

BPA does not believe that it needs additional authority to require wind generators to comply with BPA reliability and operational requirements.