

**UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION**

<b>Fiscal Years 2018-2019 Proposed</b>	)	
<b>Power and Transmission Rate</b>	)	<b>BPA Docket No. BP-18</b>
<b>Adjustment Proceeding</b>	)	

**JP03 Motion to Admit Data Requests and Responses Into Evidence**

Pursuant to the Hearing Officer's *Order on Procedures to Admit Evidence* issued March 31, 2017 (BP-18-HOO-24), JP03 hereby moves the Hearing Officer to admit the following data requests and associated responses into evidence in the BP-18 proceeding ("Subject Data Requests and Responses"). Copies of all of the Subject Data Requests and Responses are attached hereto as Attachment A.

Counsel for JP03 contacted counsel for JP01, and counsel for JP01 stated that JP01 does not oppose this motion.

Data Requests and Associated Responses of BPA Witnesses

**SM-BPA-26-3  
SM-BPA-26-36  
SM-BPA-26-103  
JP03-BPA-26-1  
JP03-BPA-26-2 (amended)  
JP03-BPA-26-3  
JP03-BPA-26-4  
JP03-BPA-26-5  
JP03-BPA-26-6  
JP03-BPA-26-7  
JP03-BPA-26-8  
JP03-BPA-26-10  
JP03-BPA-26-11  
JP03-BPA-26-12  
JP03-BPA-26-13 (amended)**

BP-18-M-JP03-12

**JP03-BPA-26-14**  
**JP03-BPA-26-15**  
**JP03-BPA-26-16**  
**JP03-BPA-26-17**  
**JP03-BPA-26-18**  
**JP03-BPA-26-19**  
**JP03-BPA-26-21**  
**JP03-BPA-26-22**  
**JP03-BPA-26-23**  
**JP03-BPA-26-24**  
**JP03-BPA-26-25**  
**JP03-BPA-26-26**  
**JP03-BPA-26-27**  
**JP03-BPA-26-28**  
**JP03-BPA-26-29**  
**JP03-BPA-26-30**  
**JP03-BPA-26-31**  
**JP03-BPA-26-32**  
**JP03-BPA-26-33**  
**JP03-BPA-26-35**  
**JP03-BPA-26-36**  
**JP03-BPA-26-37**  
**JP03-BPA-26-38**  
**JP03-BPA-26-39**  
**JP03-BPA-26-40**

Data Requests and Associated Responses of JP01 Witnesses

**JP03-JP01-26-34**  
**JP03-JP01-26-35**  
**JP03-JP01-26-36**  
**JP03-JP01-26-37**  
**JP03-JP01-26-38**  
**JP03-JP01-26-40**  
**JP03-JP01-26-41**  
**JP03-JP01-26-43**  
**JP03-JP01-26-44**  
**JP03-JP01-26-45**  
**JP03-JP01-26-46**  
**JP03-JP01-26-48**  
**JP03-JP01-26-51**

Respectfully submitted,

*/s/ Harvey L. Reiter*

Stinson Leonard Street LLP  
1775 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20006-4605  
[harvey.reiter@stinson.com](mailto:harvey.reiter@stinson.com)  
Counsel for JP03

April 5, 2017

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing on the Bonneville Power Administration's Office of General Counsel, the Hearing Clerk, and all litigants in this proceeding by uploading it to the BP-18 Rate Case secure website pursuant to BP-18-HOO-02, BP-18-HOO-05, and BP-18-HOO-24.

DATED: April 5, 2017.

*/s/ Harvey L. Reiter*

Stinson Leonard Street LLP  
1775 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20006-4605  
[harvey.reiter@stinson.com](mailto:harvey.reiter@stinson.com)  
Counsel for JP03

# **ATTACHMENT A**

## ***Data Requests and Associated Responses of BPA Witnesses***

Request ID: SM-BPA-26-3

Page Number: 81

Line Number: 7-11

Exhibit Filing: Technical Contact Name: Lon Peters

Technical Contact Phone: 626.365.1968

Technical Contact Email: Lon@nw-econ.com

Legal Contact Name: Andrew Meditz

Legal Contact Phone: 916.732.6124

Legal Contact Email: Andrew.Meditz@smud.org

Request Text: a) Please provide all inputs and outputs of the regression analysis used to model the risk of short-term Southern Intertie service. b) Please identify the software and version number used for the regression analysis. c) Please explain the choice of functional form(s) of the regression analyses: the decision to use specific independent or explanatory variables. d) Please identify all tests of statistical significance that were generated, reviewed, and considered in determining the validity of the regression analyses. If multiple functional forms were considered in the development of the final regression analyses used in this study, please provide copies of all such functional forms (including inputs and regression outputs), and explain the reasons why such forms were ultimately discarded.

### **Response Detail**

Date Response Filed: 12/2/2016 3:06:33 PM

Contact Name: Michael Linn

Contact Phone: 360.619.6074

Contact Email: mrlinn@bpa.gov

### **Response Text:**

a) Please see the attached spreadsheet. Mid-Columbia day-ahead power prices were not included in the analysis. This is because Mid-Columbia day-ahead prices are proprietary data acquired by BPA from The ICE Intercontinental Exchange. b) Stata/IC 13.0 for Windows (64-bit x86-64) Revision 23 Jul 2013 was used for the regression analysis. c) Both hourly north to south regressions include the price spreads as described in BP-18-E-BPA-08 Page 26, lines 7-10 as well as that term squared. The price spreads are also included as a variable to estimate a conditional variance. The price spread is included in this regression because as the difference in the market value of energy between the PNW (represented by Mid-C) and California (NP-15 and SP-15) increase, the incentive to sell energy over the Southern Intertie and purchase hourly transmission increases. The squared term helps capture the decreasing marginal effect of an increase in price spread. Hourly and daily transmission reservations in the south to north direction are both estimated with an ARMA model with 1 autoregressive lag. This functional form was chosen because BPA could not find a meaningful statistical relationship between south to north reservations and other variables. d) The "Regression Models" tab in the attached workbook will include all tests of statistical significance calculate by STATA. Other functional forms were tested but the results were not saved. However the other independent variables tested for the south to north reservations were included in the attached data set.

Files Submitted for this Response:

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Date Response Filed: 12/2/2016 4:25:09 PM

Contact Name: Michael Linn

Contact Phone: 360.619.6074

Contact Email: mrlinn@bpa.gov

Response Text:

a) Please see the attached spreadsheet. Mid-Columbia day-ahead power prices were not included in the analysis. This is because Mid-Columbia day-ahead prices are proprietary data acquired by BPA from The ICE Intercontinental Exchange. b) Stata/IC 13.0 for Windows (64-bit x86-64) Revision 23 Jul 2013 was used for the regression analysis. c) Both hourly north to south regressions include the price spreads as described in BP-18-E-BPA-08 Page 26, lines 7-10 as well as that term squared. The price spreads are also included as a variable to estimate a conditional variance. The price spread is included in this regression because as the difference in the market value of energy between the PNW (represented by Mid-C) and California (NP-15 and SP-15) increase, the incentive to sell energy over the Southern Intertie and purchase hourly transmission increases. The squared term helps capture the decreasing marginal effect of an increase in price spread. Hourly and daily transmission reservations in the south to north direction are both estimated with an ARMA model with 1 autoregressive lag. This functional form was chosen because BPA could not find a meaningful statistical relationship between south to north reservations and other variables. d) The "Regression Models" tab in the attached workbook will include all tests of statistical significance calculate by STATA. Other functional forms were tested but the results were not saved. However the other independent variables tested for the south to north reservations were included in the attached data set.

Files Submitted for this Response:

Request ID: SM-BPA-26-36
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Page Number: 6

Line Number: 22-25

Exhibit Filing: Technical Contact Name: Lon Peters

Technical Contact Phone: 626.365.1968

Technical Contact Email: Lon@nw-econ.com

Legal Contact Name: Andrew Meditz

Legal Contact Phone: 916.732.6124

Legal Contact Email: Andrew.Meditz@smud.org

Request Text:Reference: "the amount of megawatts in the queue is greatly reduced", that "some customers are choosing not to accept new offers of long-term service" and that you "believe" that this "could" be due "in part" to CAISO's 2009 market rules. a) Please identify those customers that have actually chosen not to accept new offers of long-term service. Please provide copies of all correspondence between BPA and those customers as well as any analyses or studies that discuss or describe the reasons given by those customers for their decisions not to accept offers of long-term service, and any studies undertaken by BPA to verify those reasons. b) When you say that you believe "this could be due in part to the CAISO's market rules", by "this" do you mean customers' decisions not to renew long-term firm service contracts, or a reduction in megawatts in the queue, or both? If "this" means something else, please explain. c) When you say this "could" be due in part to the CAISO market rules, what probability do you ascribe to this

possibility? Please describe any analyses you have done to support this conclusion and provide copies of any such analyses; if none exist, please so state. d) When you say that you “believe” this could be due “in part” to the CAISO market rules, what do you mean by “in part”? Does “in part” mean a specific proportion or share? If so, please provide all documents, including correspondence and studies that support your conclusion. If your belief is not based on any specific analysis or study, please so state. e) Please explain the conclusion that the 2009 market rules are having an effect in 2016 on renewal of firm long term contracts that is different from any effects prior to 2016. Please provide any supporting documentation, including studies or analyses. If there are no such studies or analyses, please so state.

Response Detail

Date Response Filed: 12/2/2016 3:50:52 PM

Contact Name: Michael Linn

Contact Phone: 360.619.6074

Contact Email: mrlinn@bpa.gov

Response Text:

a) Please see the excel file provided in SM-BPA-26-41. When customers reject offers, they are not required to provide any reason for declining. In this instance, no customer provided a reason. b) When we say “this”, we mean both customers’ decisions not to renew long-term firm service contracts and a reduction of MWs in the queue. c) Based on the stakeholder feedback received through the public process BPA conducted prior to the BP-18 rate proceeding, we believe that there is a high likelihood that the CAISO market rules have played a role in the removal of MWs from the queue and it is possible that it played a role in the rejection of offers as well. The following links contain documents and customer comments related to the public process BPA conducted on this issue. <https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Meetings-and-Workshops.aspx> <https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Customer-Comments.aspx> d) When we say “in part”, we mean we believe the CAISO market rules are likely one contributing factor to the removal of MWs from the queue and customers declining long-term service offers. It does not refer to a specific proportion or share. This conclusion is based on customer feedback during the public process that BPA conducted prior to the BP-18 rate proceeding. The links to those documents are in the response above. e) The 2009 market rules eliminated the requirement for prescheduling transmission, which effectively eliminated much of the priority that long-term firm transmission normally has had over hourly non-firm transmission when selling into the CAISO market. This reduced the value of long term transmission on the Southern Intertie relative to hourly transmission compared to previous CAISO rules and other day-ahead markets that subscribe to WECC Pre-scheduling conventions. However, because the hourly rate was set such that a customer reserving transmission 80 hours per week paid the same as a customer with long term, there was still an economic incentive to continue to subscribe to long term if the customers demand for transmission exceeded the 80 hours. As explained in BPA-16-E-BPA-12, pg 4-5, ln 12 to 12, the increased solar generation in CAISO has caused the number of heavy load hours (hours with high net load) to trend downward in recent years reducing the number of hours that are most attractive for Southern Intertie customers to use. Therefore, we believe that an hourly rate priced based on an assumption of 80 heavy load hours a week is not high enough to assure that there is a sufficient economic incentive for customers to purchase or continue subscribing to long term transmission.

Files Submitted for this Response:



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If you believe information on this site is missing or in error, please [Submit that comment here](#).

SM-BPA-26-103
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RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Please also see BPA's response to SM-BPA-26-48(a) and (b), which refers to workshop materials.

(a) Reference: Presentation by FTI Consulting on September 29, 2015. Who retained FTI Consulting? If you do not know, please so state.

(b) Reference: Customer comments (various dates, especially September 29, 2015). Other than Powerex, please identify which existing long-term firm transmission service customer(s) on the Southern Intertie has (have) stated to Bonneville (i) that that "long-term firm transmission no longer has the value that it once had" and/or (ii) that the customer(s) is (are) not renewing service."

(c) Which commenters, other than Powerex, do you understand both (i) to hold existing contracts for firm southbound transmission service on the Southern Intertie and (ii) to have expressed concerns about the value of long-term firm service on the Southern Intertie?

(d) Reference: PGE's comments in the workshop process. Did BPA obtain specific information from Portland General Electric (PGE) regarding the results of PGE's offer for shares of long-term firm rights on the Southern Intertie? If so, please provide such information.

(e) Reference: PGE's comments in the workshop process. Has BPA considered that changes occurring in the region with respect to emerging markets and renewable resource mandates will increase the need for long-term firm transmission? If not, please explain why not.

(f) Reference: PGE's comments in workshop process. Has BPA considered whether changes occurring in the region with respect to emerging markets and renewable resource integration will serve as a risk mitigation measure and as a pre-requisite for dynamic transfer? If not, please explain why not.

EXHIBIT: Transmission Rates Study and Rate Design Testimony BP-18-E-BPA-12

PAGE(S): 8

LINE(S): 18-19

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a. Powerex

b. In addition to Powerex, Snohomish County PUD and Tacoma Power, which are a Pacific Northwest AC Intertie capacity owners, expressed concerns about the loss of value of Southern

Intertie capacity and the potential for Southern Intertie capacity to be undersubscribed. <https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Customer-Comments.aspx>. (Oct 9 and Jan. 22 comments). Iberdrola and Transalta also generally supported Powerex's comments and Calpine also noted a change in value (Jan. 22, 2016 comments). Klickitat PUD, a holder of long-term Southern Intertie rights, belongs to the Public Power Council. Both Klickitat PUD and the Public Power Council expressed concerns about the value of long-term service and refusals of long-term offers (comments on Oct 9).

c. See answer to b.

d. BPA did not obtain specific information regarding PGE's offer.

e. BPA considered PGE's comments generally, but PGE submitted no evidence to support this statement, so BPA decided to propose the change to the IS hourly rates for the reasons in our testimony.

f. See answer to e.

For technical questions about this request please contact Dennis Metcalf by phone (3606196445) or email ([demetcalf@bpa.gov](mailto:demetcalf@bpa.gov))

If you do not wish to receive notification of data responses from this system, please log into your account, select "Account" on the left hand menu and clear the checkboxes next to the setting marked "Email data response notifications."

**DATA REQUEST NUMBER TO REFERENCE:**

**JP03-BPA-26-1**

**RESPONSE BY:**

Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

Please provide all tables and charts in Appendix A in native Excel format with all formulas intact and all linked input files.

**EXHIBIT:** Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

**PAGE(S):** 1

**LINE(S):** 1

**DATA RESPONSE:** (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

The data and the charts are located at the following web-site:

<https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Models-and-Datasets.aspx>

Labeled Appendix A: Southern Intertie Hourly Rate Design Tables and Charts, Input Data-File 1, and Input Data-File 2.

For technical questions about this request please contact Rebecca Fredrickson by phone (3606196156) or email ([refredrickson@bpa.gov](mailto:refredrickson@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-2**

**part b) is amended**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("a reduction in peak hours in California to five hours in the evening.")

- a. Please define "peak hours in California" as you have used the term in your testimony by specific reference to specific times of day and days of the week, or by objective criteria that can be applied to actual observed hourly loads.
- b. Using your definition of "peak hours in California", what was the number of peak hours in California at the end of the BP-16 rate proceeding (i.e., June 2015)?
- c. Please state and explain the specific metric used to determine "peak hours in California" in your testimony.
- d. Please state and explain changes in such metric, if any, since the conclusion of the BP-16 proceeding.
- e. Please provide any studies or other documents that quantify the "reduction in peak hours in California" since the end of the BP-16 rate proceeding. If there are no such studies or other documents, so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 1

LINE(S): 23-25

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

BPA is amending its response to part b) of this data request after discussions with JP03's counsel.

- a. See our response to SM-BPA-26-115(c).
- b. We did not study what the number of "peak hours in California" were at the end of the BP-16 rate proceeding. See our response to SM-BPA-26-25(f)(iii) where we stated, however, "the data...shows the downward trend started in FY 13 but grew especially pronounced in FY 16, after the BP-16 rate case."
- c. As explained in BP-18-E-BPA-12 and 25, we examined California load net of solar and wind generation. We also considered CAISO analysis on the integration of renewables and the development of new WSPP products.
- d. See our response to SM-BPA-26-25.

e. Please see BP-18-E-BPA-12, including Appendix A and BP-18-E-BPA-25, including Appendix A.

See also BPA workshop materials from April 20, 2016 and May 24, 2016  
<https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Meetings-and-Workshops.aspx>

Please also  
see <https://www.aiso.com/Documents/MatchingTimeOfUsePeriodsWithGridConditions-FastFacts.pdf> for CAISO's analysis on the effect of renewable integration on "peak" periods.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE:</b> <b>JP03-BPA-26-3</b>
--

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
("the peak hours, traditionally considered to be the 16 hours in the middle of the day, have been reduced to five hours in the evening") Using the methodology in your testimony to define and calculate peak hours, were there 16 peak hours in California at the end of the BP-16 rate proceeding? If the answer is "yes" please provide all supporting calculations. If the answer is "no", please provide the number of peak hours in California at the end of the BP-16 proceeding and provide all supporting calculations.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 2  
LINE(S): 2-4

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:  
See response to JP03-BPA-26-2 b).

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE:</b> <b>JP03-BPA-26-4</b>
--

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Regarding the statement that there has been a "reduction in peak hours to 5"

- a. Applying the same definition of "peak hours" used in the cited testimony, was the "reduction in peak hours to 5" a reference to a reduction in peak hours from the end of the BP-16 rate proceeding?
- b. If the answer to (a) is yes, what was the number of peak hours at the end of the BP-16 rate case?
- c. If the answer to (a) is "no," please explain.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 3

LINE(S): 10-25

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. See response to SM-BPA-26-25(f)(iii).
- b. See response to JP03-BPA-26-2 b).
- c. NA.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlnn@bpa.gov](mailto:mrlnn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-BPA-26-5**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Has BPA studied the relationship between the duck curve and the risk of cost underrecovery on the Southern Intertie, taking into account other changes in West Coast energy markets? If so, please provide such studies. If not, please so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 3

LINE(S): 20-25

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

Please see BP-18-E-BPA-12, BP-18-E-BPA-12 Appendix A, BP-18-E-BPA-26 and BP-18-E-BPA-26 Appendix A.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-BPA-26-6**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
Please provide analysis and documentation in support of the “number of peak demand hours . . . [in] the current rate design.”

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 4  
LINE(S): 8-9

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:  
Please see BP-18-E-BPA-12 Page 3 Lines 8-19, BP-16-E-BPA-31 Page 1-3 Lines 22-13, BP-16-A-02 Pages 108-113, and BP-18-E-JP03-01 Page 90 lines 7-16.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-BPA-26-7**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
(a) how do you define the term "heavy load hours" used in your rebuttal testimony?  
(b) Using your definition of "heavy load hours", were there "16 heavy load hours in California" at any time during the BP-16 rate proceeding?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 4

LINE(S): 14

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

(a) We use the term "heavy load hours" interchangeably with "peak hours". See our response to SM-BPA-26-115(c).

(b) See our response to JP03-BPA-26-2(b).

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-8</b></p>
---

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
Please provide the definition of "peak hours" as used in your testimony that led to conclusion that there are "only five peak hours".

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 4  
LINE(S): 15

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

See our response to SM-BPA-26-115(c).

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-10</b></p>
--

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
("BPA cannot require its customers to explain why they left the queue")

- a. Is BPA prevented in any way from asking customers “why they left the queue”?
- b. If so, please state the source and nature of any such prohibition(s). If not, please so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 5

LINE(S): 5

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. No.
- b. NA.

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-11</b></p>
--

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("Since January 2015, customers have rejected offers for 510 MW of new service on the Southern Intertie.")

- a. Who were the parties that rejected the offers and when did each reject the offers made?
- b. Did the offered capacity match the requested capacity?
- c. Did the offered duration match the requested duration?
- d. Whose contracts expired that freed up this capacity?
- e. Which customers contracted for the capacity that was available due to rejections of offers?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 7

LINE(S): 8-9

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents) --

UPLOADED DOCUMENTS:

[https://www.bpa.gov/secure/RateCase/openfile.aspx?fileName=Declined\\_IS.xls&contentType=application%2fx-msexcel](https://www.bpa.gov/secure/RateCase/openfile.aspx?fileName=Declined_IS.xls&contentType=application%2fx-msexcel)

--TEXT DESCRIPTION:

- a. See attached file. The time of last update field is a reasonable indication of when customers rejected service.
- b. Not in every case.



- c. Not in every case.
- d. BPA objects to this request because it is unduly burdensome to provide publicly available information. The expiring contracts that created capacity can be found on BPA's OASIS.
- e. The available transmission on both the AC and DC was created by the non-renewal of service. The available transmission on the AC intertie has recently been accepted by Cargill. BPA is in the process of drafting the transmission service contract. Available transmission on the DC was contracted by BPA Power Services. The additional capacity upcoming on the DC has not yet been offered to customers.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE:</b> <b>JP03-BPA-26-12</b>
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**RESPONSE BY:**

Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

("Currently, on the AC portion of the Southern Intertie, there are only two requests for service in the queue")

- a. Which customers made the two requests for service on the AC portion?
- b. What requests did these customers reject (for how much capacity) and when?
- c. Did the customers provide any reasons for rejecting the offers?
- d. Did BPA attempt to find out why the customers rejected the offers?
- e. Have these same customers acquired any other capacity rights from BPA since January 1, 2014?
- f. Have these same customers renewed any contracts for long-term capacity since the conclusion of the BP-16 proceeding?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 7

LINE(S): 9-10

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

- a. Cargill-Alliant LLC and Avangrid (In queue as PPM Energy, Inc.)
- b. See response to JP03-BPA-26-11
- c. No.
- d. BPA did not attempt to find out why the customers rejected the offers because most customers are often reluctant to share such information with BPA.
- e. BPA objects to this request because it is unduly burdensome to provide publicly available information. Capacity right information is available on BPA's OASIS.

f. BPA objects to this request because it is unduly burdensome to provide publicly available information. Renewal information is available on BPA's OASIS.

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-13**

**Part a) is amended**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

"Currently, on the AC portion of the Southern Intertie, there are only two requests for service in the queue. Both of these requests were submitted by customers that have recently rejected offers of service"; "the DC portion of the Southern Intertie only has five requests in the queue and will soon have unsubscribed capacity")

a. Does BPA's public OASIS posting show that there is almost no ATC southbound on the Southern Intertie through 2027?

b. Please confirm that southbound ATC on the Southern Intertie shown in response to SM-BPA-26-73 is still accurate through 2027. If the data in BPA's response to SM-BPA-26-73 is no longer accurate, please provide updated ATC projections through 2027.

c. Please state all assumptions regarding renewal of long-term firm rights in the calculation of ATC southbound on the Southern Intertie.

d. Please provide a list of all rejected offers of BPA southbound service on the Southern Intertie since January 1, 2009, including the name of the customer, the date of the request, the date of the offer, the amount of capacity requested, the amount of capacity offered, and the date the offer was declined.

e. Please provide all correspondence with customers who have declined such offers since January 1, 2009.

f. Who are the five customers with requests in the DC portion of the queue?

g. Which customers recently rejected offers of service on the AC Intertie? Please provide details of the rejected offers: date of request, date of offer, capacity requested, capacity offered, and date offers were declined.

h. Have any of the five customers in the DC queue rejected prior offers on the DC line? If so, please provide dates of request, dates of offer, capacity requested, capacity offered, and the dates such offers were declined.

i. Did any of these parties who rejected offers also renew any contracts in the last three years? If so, please identify the parties, the renewal dates, the renewal amounts, and the start/stop dates for such renewals.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 7

LINE(S): 12-19

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

BPA is amending its response to part a) of this data request after discussions with JP03's counsel.

a. BPA objects to this request because it is unduly burdensome to provide publicly available information. This information is publicly available to JP-03 and other parties via BPA's OASIS. Without waiving this objection, as of March 29, the public site incorrectly shows that there are 8 MW available, which is almost no southbound ATC. BPA's OASIS postings are dynamic and will change as inventory changes. Please see b) below.

b. The southbound ATC shown in response to SM-BPA-26-73 is currently inaccurate. BPA does not yet have an updated long term ATC projection. However, we are aware that there will be an update to this information shortly that will reflect 20 MW of additional southbound capacity available on the DC and a reduction in ATC on the COI of 8 MW. A customer chose not to rollover their full request and, once that rollover is processed, the 20 MW of capacity will become available. A customer accepted an 8 MW offer for service on the COI.

c. BPA encumbers capacity for requests with rollover rights until they decline service or the date they are required to take action to renew their rights passes.

d. We did not study this information back to 2009. Please see JP03-BPA-26-11 for more recent information.

e. We are not aware of any such correspondence.

f. BPA objects to this request because it is unduly burdensome to provide publicly available information. This information is available on BPA's OASIS. See also response to JP03-BPA-26-9

g. BPA objects to this request because it is unduly burdensome to provide publicly available information. This information is available on BPA's OASIS. See also response to JP03-BPA-26-11. It is our understanding that these customers rejected service offered for 8 MW.

h. BPA objects to this request because it is unduly burdensome to provide publicly available information. This information is available on BPA's OASIS. See also response to JP03-BPA-26-11. It is our understanding that these customers rejected service offered equal to their capacity requested.

i. BPA objects to this request because it is unduly burdensome to provide publicly available information. Renewal information is publicly available on BPA's OASIS.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

**DATA REQUEST NUMBER TO REFERENCE:**

**JP03-BPA-26-14**

**RESPONSE BY:**

Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

Please provide documentation for the conclusion that “the DC portion of the Southern Intertie . . . will soon have unsubscribed capacity.” (Emphasis added.)

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 7

LINE(S): 15-16

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

A customer recently executed rollover rights on less than their full contract demand. This will free up 20 MW of capacity on the DC portion of the Intertie after the renewal is confirmed. The renewal is currently in STUDY status. Information about this request is publically available on BPA’s OASIS.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

**DATA REQUEST NUMBER TO REFERENCE:**

**JP03-BPA-26-15**

**RESPONSE BY:**

Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

"PGE’s process was held two years prior to PGE’s comments, BPA did not find this “interest” particularly representative of the current demand for long-term firm service given the changing net load shape in California.")

a. Please provide any emails, communications and memoranda, and describe any discussions among BPA staff contemporaneous with receipt of the PGE comments that reflect, discuss or describe the considerations given to the PGE comments.

b. If the considerations of PGE's comments referenced in the rebuttal testimony were developed after the filing of BPA staff's direct testimony, please so state.

c. Given that the PGE comments were made in late 2015 during the regional workshop process and not in 2013, please explain why BPA chose not to inquire of PGE why PGE believed its 2013 experience was relevant when it filed its comments in late 2015.

d. The PGE's comments stated that it "experienced broad, significant interest when it performed an offer process for PGE shares of long-term firm rights on the Southern Intertie," but its comments do not state when it performed its offer process. When did the BPA witnesses ascertain that the "offer process" referenced in PGE's comments occurred in 2013? If the witnesses did not ascertain that this offer process occurred in 2013 until after they filed their direct testimony in this case, please so state.

e. The PGE comments also stated that "changes occurring in the region with respect to emerging markets and renewable resource integration will serve to increase the need for long term firm transmission" and that this "will serve as a risk mitigation measure." Please describe what consideration BPA gave to this portion of PGE's comments in developing its position the Southern Intertie hourly transmission rates and provide all documents contemporaneous with the receipt of these comments that reflect, discuss or describe the consideration given to those comments.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 8-9

LINE(S): 20 thru 5

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a. We do not have any such documents to provide.

b. BPA considered PGE's comments when they were first received.

c. PGE's comments were supplied during the first comment period of the Southern Intertie Hourly Non-Firm Workshops. As part of the process, we asked customers if they would like us to explore different alternatives, and we encouraged customers to develop their proposals so we could evaluate them, including HNF rates. In addition, we offered to meet with customers to help develop any considerations for rate case.

d. We were aware of PGE's offer process while it was occurring so we were aware when the comments were received they were referring to a process held in 2013.

e. We considered these statements to be vague. See BP-18-E-BPA-25, pg 11-12, ln 10 -10 where we address similar concerns.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-16**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Please provide documentation for the 1,579 MW of Powerex's Southern Intertie reservations "up for renewal during the BP-18 rate period."

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 9

LINE(S): 11-12

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents) --

UPLOADED DOCUMENTS:

<https://www.bpa.gov/secure/RateCase/openfile.aspx?fileName=JP03-BPA-26-16.pdf&contentType=application%2fpdf>

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-17**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

"Powerex has stated that it will consider not renewing long-term firm service if BPA fails to change its hourly rates on the Southern Intertie")

- a. Please identify, by name, the individual(s) at Powerex who made the statement "that it will consider not renewing long-term firm service if BPA fails to change its hourly rates on the Southern Intertie"?
- b. When was this statement made to BPA?
- c. To whom at BPA was this statement made?
- d. Please provide a copy of this statement if it was communicated in written form. If it was made as part of Powerex's comments during the workshop process, please identify the specific comments and the portion of those comments that contain this statement.
- e. Do you understand Powerex to have made this claim in its testimony (JP01) in this case? If so, please identify the portions of the testimony where that statement was made. If not, please so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 9

LINE(S): 12-13

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a) – d) please see response to data request SM-BPA-26-91.

e) We understand that JP01 testified there understanding of the public process. In addition, our understanding of JP01's response to the motion to compel, "the JP01 witnesses made no representations about JP01 members' sales" in their testimony. JP01 Answer at 32. However JP01's testimony does attempt to use publicly available information to show that transmission customers generally may not be as willing to commit to long-term service as has historically been the case. Deen & Wellenius, BP-18-E-JP01-02, at 1.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE: JP03-BPA-26-18</b>
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RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
(100 percent renewal rate in FY 2016 "may well have been influenced by customers' expectations that BPA would take action to address seams issues and increase the incentive to purchase long-term firm service.")

- a. By "may well have" are you relying on any specific customer statements to that effect made publicly or to BPA? If so, please provide all supporting documents and communications.
- b. If the answer to a. is "no", please provide any other evidence on which you relied to support the assertion that customer renewals in FY2016 were "influenced by customers' expectations that BPA would take action to address seams issues and increase the incentive to purchase long-term firm service."
- c. Applying the same "may well have" standard, do you agree that FY2016 customer renewals "may well have been influenced" by those customers' determinations that long-term firm service would be more valuable to them than hourly service? If your answer is other than an unqualified "yes," please explain fully.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 10  
LINE(S): 10-15

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. We are not relying on specific customer statements. As we state in our testimony, we are relying on the logic that customers may have been influenced to renew based on BPA's commitment to a public process to address the topic.
- b. See (a).

c. Customer renewals may well have been influenced by determinations that long term service would be more valuable than hourly service, particularly given BPA's commitment to address the issue of the viability of long term service on the Southern Intertie.

For technical questions about this request please contact Dennis Metcalf by phone (3606196445) or email ([demetcalf@bpa.gov](mailto:demetcalf@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE: JP03-BPA-26-19</b>
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RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

"renewable energy generated in California should, if anything, reduce demand for long- term firm transmission on the Southern Intertie because that renewable generation would not be displaced by imports from the Pacific Northwest"

Do you agree that if the demand for renewable generation in California increases by greater than the amount of renewable generation built in California, this will increase the demand in California for renewable generation located outside the state of California? If your answer is other than an unqualified "yes," please explain fully.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 11  
LINE(S): 12-16

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

Not necessarily. If the demand for renewable generation in California is greater than the amount of renewable generation built in California, entities could choose to build more renewable generation within California to meet the growing demand. Even if the amount built in California is less than the demand, any increase in renewables in California should reduce demand for long term firm transmission on the Southern Intertie because, as we testified, those renewables would not be displaceable by imports from the Pacific Northwest.

Also, entities could import renewable generation from other regions, like the Southwest, to meet additional renewable need within California. Importing renewables from the Pacific Northwest is just one of many options for meeting additional demand for renewable resources within California.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))



**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-21**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

(asserting that JP03's statement that California utilities can secure delivery of long-term firm purchases of renewable energy from the Northwest either by purchasing long-term rights on the Southern Intertie or "can purchase, bundled or unbundled, firm rights held by others" "suggests that it could be imprudent to expect that California utilities will purchase long-term firm service to meet California's RPS regulations."

- a. Have you reviewed any contracts that California utilities have signed with Northwest suppliers to deliver long-term firm supplies of renewable energy? If "yes", which ones? If "no", why not?
- b. Would you consider it prudent to sign a long-term contract to take delivery of firm energy without ensuring a firm transmission path for delivery to load? If so, please provide the definition of "prudence".
- c. Do you agree that long-term firm service on the Southern Intertie is necessary, at least in some cases, to deliver long-term firm supplies of renewable energy into California? If not, please so state.
- d. Do you know whether long-term firm energy sales into California from the Northwest exist? If so, do you know whether such long-term energy sales rely on long-term firm transmission service on the Southern Intertie?
- e. Is the contract between BPA-T and LADWP on behalf of SCPPA for delivery of the output of Pebble Springs to the NW Hub an example of such a "long-term firm" transaction?
- f. Do you agree that the level of subscription to long term firm service on the Southern Intertie necessary to deliver long-term firm purchases from the Northwest to California is not affected by whether that capacity is contracted for by California entities or their suppliers? If your answer is other than an unqualified "yes," please explain.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 12

LINE(S): 3-10

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a) We have partially reviewed the long term contracts provided by JP03 in response to BPA-JP03-26-23.
- b) The "prudence" of signing such an agreement would likely depend on the terms of the contract and one's own risk tolerance.
- c) It is our understanding that some RPS requirements require renewable energy from outside the region to be dynamically transferred into California. In these cases it would be

necessary to have long term firm service to access small portion of the AC Intertie capacity (400 MW) that is available for dynamic transfers.

d) We are aware that there are some long-term firm energy sales into California; however we are unaware of details of such arrangements as they are not public information.

e) No. The “long term firm” transactions being referenced in the testimony are long term firm transactions on the Southern Intertie. We understand the contract referred to in the question to be a long term firm transmission agreement held by LADWP for service from Pebble Springs to NW Hub on BPA’s Network so it would not be a relevant example.

f) No. If there is a change in behavior of who purchases long term firm service on the intertie, one would need to better understand the drivers behind that change in order to better assess whether it would change the demand for long term firm service on the Intertie. For example, if the California entity and the supplier have different risk tolerances, it could impact the level of subscription for long term firm depending on how the contract for delivery is structured including who is responsible for transmission costs and mitigation actions if transmission is not available.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

<b>DATA REQUEST NUMBER TO REFERENCE: JP03-BPA-26-22</b>
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RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("Powerex is already moving to the use of hourly service to some extent.")

a. Do you agree that holders of long-term firm service have increased their overall scheduled use of their rights since the BP-16 rate case concluded?

b. Do you agree that overall use of original hourly service has not increased since the BP-16 rate case concluded?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 12

LINE(S): 23-24

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a) Yes, however changes in the volumes of schedules may be explained by differences in snow pack and a prolonged derate/outage to the PDCI in FY2015. See BP-18-E-BPA-25, page 25, ln 2-19, Chart 3 in the Appendix of BP-18-E-BPA-25 and the data posted in response to JP03-BPA-26-01.

b) It appears the overall use of original hourly service has declined in all hours except the evening peak. See BP-18-E-BPA-25, page 25-26, ln 2-4 and the data posted in response to JP03-BPA-26-01.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-23**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("transmission is not usually resold at a price higher than BPA's hourly rate")

a. When you say "that transmission is not usually resold at a price higher than BPA's hourly rate," under what circumstances is transmission resold at a price higher than BPA's hourly rate?

b. Have you studied how much revenue is earned by long-term rights holders when they resell their transmission at a price higher than BPA's hourly rate? If so, please provide documentation. If not, please so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 12  
LINE(S): 13-14

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a) Information regarding the resale of BPA's transmission was provided in response to JP-03-BPA-26-49. This reflects the information available to the panel (and publicly) about the circumstances when transmission was sold at a price higher than BPA's rate.

b) No. Transmission service is rarely sold above BPA's hourly rate.

**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-24**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

What financial motivation would a long-term firm rights holder have to "create its own non-firm capacity in the CAISO day-ahead market." Please compare this motivation with the motivation

of the same entity to use its long-term firm rights in any other manner. Please provide supporting studies and documentation.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 12-13

LINE(S): 24 thru 11

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

One motivation a customer could have to “create its own non-firm” capacity in the CAISO day-ahead market is to make or potentially makes sales in excess of their long term firm rights. This motivation is not in conflict with their motivation to use their long term rights. It is a motivation to use a greater share of the Southern Intertie. We did not do any studies on the financial motivation of customers.

For technical questions about this request please contact Rebecca Fredrickson by phone (3606196156) or email ([refredrickson@bpa.gov](mailto:refredrickson@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-25**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

(“transmission is not usually resold at a price higher than BPA’s hourly rate”).

Please provide any studies conducted by BPA of the extent to which existing long-term rights holders may or do receive a price for transmission that is higher than BPA's hourly rate when they sell delivered energy at COB/NOB. If there are no such studies, please so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 13

LINE(S): 13-14

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

BPA objects to this request because it is not relevant to the cited testimony. The referenced testimony looked at the re-sale prices of transmission based on the data provided in SM-BP-26-49, not bundled energy. Without waiving this objection, please see BP-18-E-BPA-25 at 28.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-BPA-26-26**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
Does “firm” in these two lines include hourly firm, short-term firm, and/or long-term firm?  
Please specify which types of firm rights are included and excluded included in this statement.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 13  
LINE(S): 15 and 22

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:  
“Firm” in these two lines refers to hourly, short-term and long term transmission.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-BPA-26-27**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
("hourly requests denied across the day show a concentration in the evening peak"; "denied hourly reservations have become largely concentrated in the evening peak.")

- a. Please provide documentation of such concentration.
- b. Why are denied hourly reservations concentrated in the evening peak?
- c. Are the reasons why hourly requests were denied during CY16 different from the reasons why such requests were denied during CY14 or CY15? Please explain.
- d. When specifically is the “evening peak”? How long does it last? Does it vary by time of year? Is the evening peak typically the period of highest net peak load during the day in California?
- e. When was the “evening peak” in California in the spring of 2015, using the definition you currently apply in BP-18? Please specify the hours.

f. Using your definition of “evening peak”, was the total energy delivered to California during the evening peak during calendar 2015 greater or smaller than the total energy delivered during the evening peak during calendar 2016?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 17-18

LINE(S): 19-21 and 11-12

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. The distribution of refused hourly requests are provided in Table 6 and Chart 4 of the Appendix to BP-18-E-BPA-25 (on pages A-10 and A-11).
- b. We believe that denied hourly requests are concentrated in the evening peak because that is when there is the most demand for hourly service.
- c. No. Requests are denied when ATC is not available to serve that request.
- d. See data request SMUD-BPA-26-115.
- e. Our testimony does not discuss an evening peak in the spring of 2015.
- f. We do not have information about the “total energy delivered to California.” In response to data request SM-BPA-26-111 BPA provided schedules over the Southern Intertie which could be used as an indicator for the energy delivered to California from the Northwest.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-28</b></p>
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RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Have you studied whether, and to what extent, during periods of denied hourly reservations during the evening peak, long-term rights holders were able to resell their capacity at prices above the hourly rate? If so, please provide such studies or documentation.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 17

LINE(S): 19-21

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

We did not study this.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-29**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

Please provide any documentation for the "variety of evidence" aside from Attachment 1.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 19

LINE(S): 8-9

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

See BPA-18-E-BPA-25 page 19, lines 9-19. See also BP-18-E-BPA-25 Appendix A and BP-18-E-BPA-12 Appendix A.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-30**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("may be some circumstances in which hourly service is not a perfect substitute for long-term firm transmission") Please describe all "circumstances in which hourly service is not a perfect substitute for long-term firm transmission."

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 20

LINE(S): 11-12

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

BPA objects to this request because it is beyond the scope of the testimony, which only suggests that there may be instances where hourly service is not a perfect substitute and not an attempt to provide a complete list. Without waiving this objection, an example would be long term firm that is required for dynamic schedules over the Southern Intertie and hourly cannot be substituted for this use.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-31**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("Long-term and hourly transmission service are substitutes because they can largely be used for the same purpose.")

- a. Please identify the circumstances under which hourly transmission service cannot be used for the same purposes as long-term firm transmission service.
- b. Please define all circumstances covered by the term "largely". Please provide all studies and documentation of such substitution.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 21

LINE(S): 5-6

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. See response to JP03-BPA-26-30.
- b. BPA objects to this request because it is beyond the scope of the testimony, which only states that long-term and hourly transmission service can largely be used for the same purpose, and is not an attempt to provide a complete list. Without waiving this objection, the term "largely" refers to markets operated by the California ISO, unless dynamic scheduling is required and short term energy sales in markets not operated by the California ISO.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))



**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-32**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
Please provide studies and documentation related to the conclusion regarding “less expensive options”, especially for California utilities with long-term purchase obligations for renewable energy in the Northwest.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 27-28  
LINE(S): 18 thru 3

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:  
Please see BP-18-E-BPA-25, at 27-28, lines 23-3, where we describe the different options purchasers have. JP03’s rebuttal testimony notes that other Northwest transmission providers that have Southern Intertie capacity have rates lower than BPA’s proposed hourly rates. See BP-18-E-JP03-2 at 8.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-33**

RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
("A reduction in hourly reservations does not imply there will be a corresponding decrease in actual exports") When you say that a drop in hourly reservations does not imply "a corresponding decrease in actual exports", do you mean that there will be no decrease in actual exports or that the decrease will not be on a one-for one basis? Please explain.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 31  
LINE(S): 9-10

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

We believe that there would be no decrease in actual exports and, if there is, it may not be a decrease on a one-for one basis. As described in our testimony, JP-03's conclusion that exports from the Pacific Northwest will decrease depends on a number of assumptions. See BP-18-E-BPA-25, page 31, line 15 – 20.

For technical questions about this request please contact Lauren Tenney Denison by phone (3606196294) or email ([letenney@bpa.gov](mailto:letenney@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-35</b>
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RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

("BPA did not study non-rate alternatives in preparation of this rate case because the rate case is used to set rates, not implement changes to business practices or operating procedures"). Please provide all documents that discuss or analyze whether adoption of any the non-rate alternatives explored during BPA's regional process would have avoided or mitigated the need to adopt its proposed increase in hourly rates on the Southern Intertie. If there are no such documents, so state.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 35

LINE(S): 16-21

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

BPA objects to this request because it is unduly burdensome to produce publicly available information. This information is publicly available at:  
<https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Meetings-and-Workshops.aspx>.

For technical questions about this request please contact Rebecca Fredrickson by phone (3606196156) or email ([refredrickson@bpa.gov](mailto:refredrickson@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-36</b>
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RESPONSE BY:

ORIGINAL DATA REQUEST:

("BPA identified several non-rate alternatives" that would "require significant systems changes to be implemented")

- a. Which non-rate options would require "significant systems changes"?
- b. Does "time-intensive" mean many people working on the option at the same time, or a long duration of time, or both, or something else? If something else, please explain.
- c. At what point in time did BPA "know" that "these options require significant systems changes in order to be implemented"?
- d. Please describe the specific systems changes and provide (1) any estimates of their costs and (2) the time period for implementation of these changes.
- e. Has BPA evaluated whether these systems changes would have obviated or mitigated the need to increase the hourly rates on the Southern Intertie? If so, please provide a copy of the evaluation and identify when BPA conducted this evaluation.
- f. Has BPA evaluated whether these systems changes would be more cost-effective than an increase in hourly rates on the Southern Intertie: would achieve the objective at lower societal cost?

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 39

LINE(S): 8-10

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. Any change that would require system changes, collaboration with other Transmission Providers and changes that might require agreements with others.
  - b. In this context, "time-intensive" means that there would be many people working on the same option or a long duration of time.
  - c. The time in which BPA concluded that the options would require significant system changes in order to be implemented was in February 2016 and shared with customers at the 2/17/16 workshop.
  - d. Please see the white paper at the following site:  
<https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Meetings-and-Workshops.aspx>
  - e. BPA objects to this question because it is outside the scope of the cited testimony, which only discusses the obstacles to implementing non-rates alternatives.
  - f. BPA objects to this question because it is outside the scope of the cited testimony, which only discusses the obstacles to implementing non-rates alternatives.
- For technical questions about this request please contact Rebecca Fredrickson by phone (3606196156) or email ([refredrickson@bpa.gov](mailto:refredrickson@bpa.gov))

DATA REQUEST NUMBER TO REFERENCE:

**JP03-BPA-26-37**

RESPONSE BY:

Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:

- a. Please confirm that Chart 5 in Appendix A to BP-18-E-BPA-12 is based on data posted by BPA at <https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Models-and-Datasets.aspx>, specifically in the file Transmission Rates Study and Rate Design Testimony Southern Intertie Hourly Rate Design Charts and Data
- b. Please confirm and verify that the file referenced in a. contains (in Tab ST\_IS\_Reservations) hourly data for FY10-14, which was used by BPA to create Chart 5 in Appendix A of BP-18-E-BPA-12.
- c. JP03 represents that JP03 has extracted the hourly data in Tab ST\_IS\_Reservations of the file referenced in a. to produce a chart that shows individual years, which were combined in BPA's Chart 5 for FY10-14. Please verify and confirm that the chart included in the separately uploaded Excel file is based on the same data posted by BPA and referenced in a.

The Excel file will be uploaded in an immediately subsequent data request, due to limitations of the secure web site.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 3

LINE(S): 25

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a) Yes.
- b) BPA objects to this request as it does not pertain to BPA's rebuttal testimony. BPA did not create these charts, and it would require BPA to perform new analysis. Without waiving this objection, BPA did not use the ST\_IS\_Reservations tab to create Chart 5.
- c) BPA objects to this request as it does not pertain to BPA's rebuttal testimony. BPA did not create these charts, and it would require BPA to perform new analysis. Without waiving this objection, BPA did not use the ST\_IS\_Reservations tab to create Chart 5.

For technical questions about this request please contact Michael Linn by phone (3606196074) or email ([mrlinn@bpa.gov](mailto:mrlinn@bpa.gov))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-38</b></p>
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No response required.

**DATA REQUEST NUMBER TO REFERENCE:**  
**JP03-BPA-26-39**

**RESPONSE BY:**

Colleen McDonnell - Bonneville Power Administration

**ORIGINAL DATA REQUEST:**

("As solar generation has increased in California, the peak hours, traditionally considered to be the 16 hours in the middle of the day, have been reduced to five hours in the evening. This trend of decreased net load in the middle of the day is referred to in the industry as the 'duck curve.'")

Regarding BPA staff's statement that the traditional peak period has been reduced to five hours in the evening:

- (a) Do you agree that data you believe to support that assertion can be extracted from BPA's file "Southern Intertie Hourly Rate Design Charts and Data"? (The complete file is posted at <https://www.bpa.gov/Finance/RateCases/BP-18/Pages/Models-and-Datasets.aspx>.)? If your answer is other than an unqualified "yes," please explain.
- (b) JP03 represents that the tab "Intertie Flows," taken from the BPA file referenced in (a) is included in the separately attached Excel file as the tab "Intertie\_Flows". Do you agree with the accuracy of this representation? If your answer is other than an unqualified "yes," please explain.
- (c) JP03 further represents that the chart shown in the tab "HourlyIntertieScheduleShape" in the attached Excel file is based on the data in "Intertie\_Flows". Do you agree with the accuracy of this representation? If your answer is other than an unqualified "yes," please explain. NOTE: THE EXCEL FILE IS SEPARATELY UPLOADED DUE TO LIMITATIONS OF THE BPA WEB SITE.
- (d) Do you agree that the chart referenced in (c) accurately reflects BPA's proposed five-hour evening peak (shown in green) referenced in your testimony for each fiscal year from FY10 through FY16? If your answer is other than an unqualified "yes", please explain.
- (e) Do you agree that the chart referenced in (c) accurately reflects total usage of the Southern Intertie, by hour, for each of the FYs depicted on the chart, as recorded and posted by BPA? If your answer is other than an unqualified "yes", please explain.
- (f) Do you agree that the chart accurately depicts "base hourly usage" (for any FY, defined as the minimum energy scheduled in all hours of the average day) of the Southern Intertie? If your answer is other than an unqualified "yes", please explain.

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 2

LINE(S): 2-5

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a) Yes.
- b) BPA objects to the request because the chart provided by JP03 is not part of BPA's testimony, and it would require BPA to perform new analysis.
- c) BPA objects to the request because the chart provided by JP03 is not part of BPA's testimony, and it would require BPA to perform new analysis. Without waiving this objection, we note that the term "HourlyIntertieScheduleShape" indicates that JP03 is showing how the Southern Intertie was scheduled, but its analysis seems to be based on flow. As a result, we cannot determine the accuracy of JP03's analysis.
- d) BPA objects to the request because the chart provided by JP03 is not part of BPA's testimony, and it would require BPA to perform new analysis. Without waiving this objection, we don't see anything in green on this spreadsheet.
- e) BPA objects to the request because the chart provided by JP03 is not part of BPA's testimony, and it would require BPA to perform new analysis. Without waiving this objection, we cannot determine the accuracy of JP03's analysis for the reasons described in c). We also are unsure what JP03 means by "usage" in this context.
- f) BPA objects to the request because the chart provided by JP03 is not part of BPA's testimony, it would require BPA to perform new analysis, and BPA is unsure what exactly JP03 is calculating or how it is calculating it. BPA also objects to this request because it did not calculate "base hourly usage" in its testimony or even use that term. Without waiving this objection, we cannot confirm the accuracy of JP03's "base hourly usage" because it is not clear whether it is measuring schedules or flow or some other metric.

For technical questions about this request please contact Michael Linn by phone (3606196294) or email ([mrlnn@bpa.gov](mailto:mrlnn@bpa.gov))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-BPA-26-40</b></p>
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RESPONSE BY:  
Colleen McDonnell - Bonneville Power Administration

ORIGINAL DATA REQUEST:  
<https://www.bpa.gov/secure/RateCase/openfile.aspx?fileName=JP03-BPA-26-39+Attachment+Intertie+Flows+Shapes.xlsx&contentType=%26contentType%3dapplication%252fvnd.openxmlformats-officedocument.spreadsheetml.sheet>

EXHIBIT: Southern Intertie Hourly Rate Rebuttal Testimony BP-18-E-BPA-25

PAGE(S): 2

LINE(S): 2-5

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

See response to JP03-BPA-26-39

***Data Requests and Associated Responses of JP01 Witnesses***

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-34**

RESPONSE BY:  
Tyler Johnson - Joint Party 1

**ORIGINAL DATA REQUEST:**

“If the quantity of long-term transmission service that is available for sale exceeds the quantity of requests for new long-term service in the queue, then the path will not be fully subscribed on a long-term basis.”

If the requests for new long term service in the queue are less than what is available for sale, is it possible that others, not currently in the queue, might choose to subscribe to long-term firm service?

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 4  
LINE(S): 12-15

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

Transmission customers are generally permitted to submit a request for long-term service at any time, regardless of whether or not “requests for new long term service in the queue are less than what is available for sale[.]”

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-35**

RESPONSE BY:  
Tyler Johnson - Joint Party 1

**ORIGINAL DATA REQUEST:**

“Importantly, the queue for new service requests represents the maximum quantity of new long-term service that BPA would be able to sell, since these requests give the transmission customer that submits them the option—but not the obligation—to commit to long-term service.”

a. If the queue exceeds the total capacity on the Southern Intertie, would the queue for new service exceed the quantity of new long-term firm service that BPA would be able to sell? If your answer is other than an unqualified “yes”, please explain.

b. Do you agree that subsequent to the adoption of CAISO's market rule changes in 2009



the queue did, in fact, exceed the total capacity on the Southern Intertie?

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 4

LINE(S): 16-19

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

JP01 objects to the request as vague as to “total capacity on the Southern Intertie.” It is unclear if JP03 is referring to the rated capacity of the associated paths, BPA’s capacity ownership, available transmission capability, or some other definition.

Subject to the foregoing objection, JP01 responds as follows, assuming JP03 is referring to total Southern Intertie capacity controlled by BPA:

- a. Not necessarily. For instance, if the queue includes requests whose dates of service do not overlap, then the sum of those requests could not be compared to the available transmission capacity.
- b. The quantity of requests for new service on the Southern Intertie has varied considerably since 2009. At present, the quantity of requests for new long-term service is far below BPA’s total capacity on the Southern Intertie.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-JP01-26-36</b></p>
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RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

“During the BP-18 rate period, 1,152 MW of long-term service reservations on this path will terminate unless they are renewed.”

Please provide all evidence in your possession that these reservations will not be renewed. If you are not claiming that these reservations will not be renewed, please so state.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 5-6

LINE(S): 17 through 2

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

The statement makes no claim as to whether or not the reservations will be renewed. It simply concludes that if the reservations are not renewed, they will terminate.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-JP01-26-37</b></p>
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RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

- a. Please provide any analysis and/or documentation supporting the conclusion that an expectation of renewal of expiring rights is “a risky bet”. Please provide any analysis and/or documentation that supports the probability of renewal for each long-term contract.
- b. Please provide all material documentation, analyses, and communications supporting JP01’s concern that the renewal rate on the AC Intertie will fall below 92 percent, the average renewal rate from 2011-2016, particularly given that all customers have renewed service since July 2015.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 6-7

LINE(S): 6-11 and 18-3

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. This request mischaracterizes the testimony, which describes that it would be a “risky bet” for BPA to rely almost exclusively on renewals, rather than on a combination of renewals and new service, given the small volume of existing requests for new service. The quoted statement is not based on an analysis of the probability of renewal of any specific long-term reservation.
- b. The testimony does not assert that “the renewal rate on the AC Intertie will fall below 92 percent[.]” Instead, it states that renewal rate would need to be at least 92% to achieve full subscription of the path on a long-term basis. Please see Response to request 38(a) regarding how that figure was derived.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-38**

RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

“Similarly, on the AC Intertie, the renewal rate would need to be at least 92% to achieve full subscription of the path on a long-term basis, given the requests for new service discussed above.”

- a. Please provide any studies you have conducted or reviewed of the historical rates of renewal on the Southern Intertie.
- b. You mention that BPA's spreadsheet shows no requests for new service beyond January 2019 on the DC intertie. Are you asserting that no such requests will be made before January 2019?

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 8

LINE(S): 18-20

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

- a. Please see BP-18-E-JP01-02 at 5, lines 9-14.
- b. No.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-40**

RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

You state that "renewals on the Southern Intertie for the period FY 2011-2016 averaged well below 100%, as documented in pre-rate workshop material presented by BPA staff.”

- a. Please provide all calculations of renewal rates, by year, that you relied on for the preparation of your testimony.
- b. Has the rate of renewals increased or decreased since the beginning of FY2011?

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 9

LINE(S): 1-2

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a. The cited statement is based on the calculation of renewal rates for the FY 2011-2016 period, rather than “by year,” and the source of this calculation was identified in BP-18-E-JP01-02 at 9, Footnote 13, citing to BPA’s Regional White Paper, Appendix B.

b. JP01 objects to this request to the extent it calls on JP01 to perform new analysis or to provide publicly available documents. Subject to the foregoing, as explained in response to subpart (a), JP01 did not perform a calculation of historical renewal rates by year. However, the data on renewals is publicly available on BPA’s OASIS and would enable JP03 to perform the requested analysis.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-JP01-26-41</b></p>
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RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

whether JP03’s testimony demonstrates that it is improper, or a departure from “cost based” ratemaking, to set rates based on the expected hours that a transmission product will be used. Is it your position that the rates for hourly transmission service on the Southern Intertie should be based on the expected hours these services will be used? If your answer is other than an unqualified yes, please explain.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 12

LINE(S): 7-9

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

JP01 objects to the request as it is based off a question to the witnesses, not the witnesses’ statements. Specifically, the cited text poses the question “Does JP03’s testimony demonstrate that it is improper, or a departure from ‘cost based’ ratemaking, to set rates based on the

expected hours that a transmission product will be used?” The JP01 witnesses answered this question in BP-18-E-JP01-02 at 12:10-18 through 13:1-4. Subject to the foregoing, it is JP01’s position that BPA’s rates should be designed to recover costs and to allocate those costs among transmission customers using the different transmission products. JP01 believes BPA staff’s rate proposals on the Southern Intertie achieve this objective.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

<b>DATA REQUEST NUMBER TO REFERENCE: JP03-JP01-26-43</b>
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**RESPONSE BY:**

Tyler Johnson - Joint Party 1

**ORIGINAL DATA REQUEST:**

- a. Please provide all material documentation, analyses, and communication used to determine that there has been an “inequitable transfer of benefits to California entities to the detriment of BPA’s transmission investment, cost recovery, and rate stability interests.”
- b. Please define and provide specific examples of “inequitable”.
- c. Is any transfer of benefits to California inequitable, or would some transfer be “equitable”? If the latter, please provide a definition of the point at which it would be clear to the witnesses that the transfer shifted from being equitable to inequitable, or vice versa.

**EXHIBIT:** Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

**PAGE(S):** 14

**LINE(S):** 15-18

**DATA RESPONSE:** (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

- a. The cited passage refers to “concerns raised in the pre-rate workshops that seams issues on the Southern Intertie have resulted in the inequitable transfer of benefits to California entities to the detriment of BPA’s transmission investment.” The cited passage is based on our participation in and our familiarity with the information from the public pre-rate case and regional workshops conducted by BPA staff during 2015 and 2016. All of that information is publicly available on BPA’s website.
- b. As used in the referenced passage, “inequitable” refers to outcomes resulting from the interaction of market design rules. In the context of this issue, one example of inequitable outcomes is that firm service effectively has no scheduling priority over non-firm service for deliveries on the Southern Intertie.
- c. JP01 objects to the extent the request calls for speculation; the JP01 testimony does not offer any opinion on what would be an equitable or an inequitable allocation of the benefits of

transmission service between the Pacific Northwest and California.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-44**

RESPONSE BY:  
Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

Does the conclusion that “only around 2% of energy deliveries” use hourly service include both original hourly service and original long-term service used for hourly schedules? If not, please explain the decision to omit original long-term service used for hourly schedules from this calculation.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 15  
LINE(S): 3-5

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

No, it does not. Only original hourly service faces the BPA tariff rate for hourly transmission service on the Southern Intertie. Therefore, an assessment of the quantity of transmission schedules potentially affected by the proposed rate should properly exclude original service other than hourly service, even if that service is re-directed on an hourly basis or otherwise “used for hourly schedules.”

JP01 notes that its witnesses’ calculation is consistent with the calculation performed by BPA staff. See BP-18-E-BPA-25 at Table 3, and at Page 29, line 15 through Page 30, line 2.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-45**

RESPONSE BY:  
Tyler Johnson - Joint Party 1

**ORIGINAL DATA REQUEST:**

Please provide studies and/or documentation in support of the conclusion that the higher hourly transmission rate will not affect “other types of transmission service.”

**EXHIBIT:** Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

**PAGE(S):** 15-16

**LINE(S):** 18 thru 4

**DATA RESPONSE:** (NOTE: You MUST log in to the site in order to view any documents)

**--TEXT DESCRIPTION:**

JP01 objects to this request as it misstates testimony. The testimony clearly states that “purchases delivered on other types of transmission service will not incur the higher rate.” This conclusion is based on the fact that BPA’s hourly rate on the Southern Intertie applies only to original hourly service, and not to any other type of transmission service.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

**DATA REQUEST NUMBER TO REFERENCE:**

**JP03-JP01-26-46**

**RESPONSE BY:**

Tyler Johnson - Joint Party 1

**ORIGINAL DATA REQUEST:**

"the higher proposed rate for hourly transmission service will only apply to energy delivered using that type of service; purchases delivered on other types of transmission service will not incur the higher rate."

- a. Do you contend that the rates charged for using the transmission rights of long-term firm service customers to deliver energy will not be affected by the proposed increase in BPA’s hourly rates?
- b. If so, please provide all studies and documentation.
- c. If not, describe the effect you anticipate the proposed increase in rates for hourly service on the Southern Intertie will have on the rates that long-term rights holders on the Southern Intertie will charge third parties using such rights. Please provide copies of any analyses you (the witnesses) have done or reviewed that project the impact that increasing the rates for hourly service on the Southern Intertie (per the BPA staff's proposal) will have on what holders of long-term firm service will be able to charge for use of their rights by third parties delivering energy using those rights. Include any studies regarding the effect of (i) the increase in rates for hourly service on the Southern Intertie proposed by BPA staff on (ii) the bundled prices for energy that long-term firm rights holders will be able to charge for energy delivered using their long-term

firm rights on the Southern Intertie.

d. If no studies exist, please explain how and why transactions using long-term firm rights, whether for delivery of unbundled or bundled energy, will be immune to the increase in hourly rates.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 16

LINE(S): 1-4

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

a. The cited passage explains the types of transmission service to which the proposed rate will apply. It does not make any contention regarding how the rates for other types of transmission services might or might not be affected.

b. n/a

c. JP01 objects to the extent the request calls for speculation, or performance of new analysis or studies. Subject to the foregoing, JP01 responds that JP01's testimony does not address, nor does it rely upon any analysis of, the potential effect of BPA Staff's hourly rate proposal on the prices that may prevail for the resale, assignment or transfer of long-term rights on the Southern Intertie. JP01 witnesses do not possess any documents responsive to the question.

d. JP01 objects to the extent the request calls for speculation, or performance of new analysis or studies. Subject to the foregoing, JP01 responds that JP01's testimony does not address, nor does it rely upon any analysis of, the potential effect of BPA Staff's hourly rate proposal on the nature, terms or quantity of "transactions using long-term firm rights" referred to in the question. However, transactions using long-term rights will not be subject to BPA's proposed hourly rate, which applies only to original hourly service, which comprises only a very small percentage of energy delivered over the Southern Intertie (JP01 rebuttal testimony at Page 15 lines 3-5). Moreover, as described in JP01 rebuttal testimony at Page 16, lines 9-13, energy delivered from the Pacific Northwest to COB or NOB must compete with energy available from other locations.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

<p>DATA REQUEST NUMBER TO REFERENCE: <b>JP03-JP01-26-48</b></p>
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RESPONSE BY:

Tyler Johnson - Joint Party 1



#### ORIGINAL DATA REQUEST:

arguing that JP03 “mischaracterizes” a 2015 presentation by FTI that if the hourly rates are tripled, firm rights holders, as a group, will be able to extract economic rents in three ways...

a. Do you dispute claiming the following in the FTI presentation:

1. Attractiveness of Long-Term Firm service on Southern Intertie depends entirely on ability to use it to collect congestion value on the facilities (slide 8)
2. Transmission capacity between Northwest and California is limited and highly valuable (slide 20)

3. If end-to-end service were offered by a single TSP, it would be straightforward to ensure congestion value is received by entities that fund the cost of the facilities (slide 20).

4. Congestion value can be earned by (slide 6):

- Load in higher-price locations, to buy energy from lower-price locations
- Generators in lower-price locations, to sell energy into higher-price locations
- Intermediaries, to buy from lower-price locations and sell at higher-price locations
- Liquid wholesale markets provide opportunity for transmission customers to use their reservations to deliver energy, even if they have no surplus resources of their own
- Regardless of who schedules the deliveries, there is a strong financial incentive to seek out the lowest-price available resources at the POR, promoting efficient dispatch

b. Do you agree that congestion revenues and congestion value are also referred to as congestion rent?

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 21

LINE(S): 13-14

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

#### --TEXT DESCRIPTION:

a. The statements appear to be direct quotations from portions of a September 29, 2015 presentation by FTI Consulting in the pre-rate case workshops on the Southern Intertie. None of the slides referred to by JP03 in this request was included in JP03’s Attachment 3, however, and consequently could not have been the basis for JP03’s statements regarding the presentation. But even if JP03 had included the entire presentation in its Attachment 3, none of these passages or slides support JP03’s mischaracterization that the FTI presentation “has acknowledged that if the hourly rates are tripled, firm rights holders ... will be able to extract economic rents in three ways” which is the contention that is rebutted by JP01 in the cited portion of its rebuttal testimony.

b. The JP01 rebuttal testimony does not use the terms “congestion revenues”, “congestion value”, or “congestion rent.” JP01 witnesses cannot agree or disagree with the reference without evaluating JP03’s definitions for each of the three terms referenced in the request.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))

DATA REQUEST NUMBER TO REFERENCE:  
**JP03-JP01-26-51**

RESPONSE BY:

Tyler Johnson - Joint Party 1

ORIGINAL DATA REQUEST:

THIS REQUEST IS A REPLACEMENT FOR JP03-JP01-26-50, WHICH CONTAINED A TYPOGRAPHICAL ERROR.

Please provide documentation that the JP01 witnesses have queried BPA's or any other transmission provider's OASIS as part of their work in this case. Please include the name of the transmission provider(s), the date(s) on which such queries were submitted, the purposes of queries, and the results of such queries. If the JP01 witnesses have not submitted such queries as part of their work in this case, please so state. If the JP01 witnesses have never submitted queries to the BPA OASIS, please so state. Please identify the OASIS of any transmission provider to which the JP01 witnesses have submitted queries.

EXHIBIT: Rebuttal Testimony of Joint Party 1 BP-18-E-JP01-02

PAGE(S): 22

LINE(S): 7

DATA RESPONSE: (NOTE: You MUST log in to the site in order to view any documents)

--TEXT DESCRIPTION:

JP01 witnesses do not have documents responsive to this request.

Querying of data on OASIS is an interactive on-line process that does not produce "documentation" for each such query. For this reason, it is not possible to specify the date, purpose and nature of each such query, nor are the results of such queries available without performing each query again. Furthermore, information from multiple transmission providers is available through a single OASIS service, namely the OATI "webSmartOASIS," and thus the transmission provider is just one criterion among many that can be specified in a query. It is therefore not possible to list each of the transmission providers that JP01 witnesses may have included in any queries submitted to the OATI OASIS service. Generally, however, JP01 witnesses have submitted queries specifying the transmission provider as, without limitation, BPA, Portland General Electric, PacifiCorp (Pacific Power), and Puget Sound Energy, as well as queries that were not limited to any particular transmission provider.

For technical questions about this request please contact Kevin Wellenius by phone (2074952999) or email ([Kevin.Wellenius@fticonsulting.com](mailto:Kevin.Wellenius@fticonsulting.com))