2007 Supplemental Wholesale Power Rate Case Final Proposal

FY 2009 LOAD RESOURCE STUDY

September 2008

WP-07-FS-BPA-09



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COMMONLY USED ACRONYMS

AC	Alternating Current
AEP	American Electric Power Company, Inc.
AER	Actual Energy Regulation
AFUDC	Allowance for Funds Used During Construction
AGC	Automatic Generation Control
aMW	Average Megawatt
Alcoa	Alcoa Inc.
AMNR	Accumulated Modified Net Revenues
ANR	Accumulated Net Revenues
AOP	Assured Operating Plan
ASC	Average System Cost
Avista	Avista Corporation
BASC	BPA Average System Cost
BiOp	Biological Opinion
BPA	Bonneville Power Administration
Btu	British thermal unit
C&R Discount	Conservation and Renewables Discount
CAISO	California Independent System Operator
CBFWA	Columbia Basin Fish & Wildlife Authority
CCCT	Combined-Cycle Combustion Turbine
CEC	California Energy Commission
CFAC	Columbia Falls Aluminum Company
Cfs	Cubic feet per second
CGS	Columbia Generating Station
СОВ	California-Oregon Border
COE	U.S. Army Corps of Engineers
Con Aug	Conservation Augmentation
ConMod	Conservation Modernization Program
COSA	Cost of Service Analysis
Council	Northwest Power Planning and Conservation Council
СР	Coincidental Peak
CRAC	Cost Recovery Adjustment Clause
CRC	Conservation Rate Credit
CRFM	Columbia River Fish Mitigation
CRITFC	Columbia River Inter-Tribal Fish Commission
СТ	Combustion Turbine
CY	Calendar Year (Jan-Dec)
DC	Direct Current
DDC	Dividend Distribution Clause
DJ	Dow Jones
DOE	Department of Energy
DOP	Debt Optimization Program
DROD	Draft Record of Decision
DSI	Direct Service Industrial Customer or Direct Service Industry

ECC	Energy Content Curve
EIA	Energy Information Administration
EIS	Environmental Impact Statement
EN	Energy Northwest, Inc.
Energy Northwest, Inc.	Formerly Washington Public Power Supply System (Nuclear)
EPA	Environmental Protection Agency
EPP	Environmentally Preferred Power
EQR	Electric Quarterly Report
ESA	
ESA EWEB	Endangered Species Act
	Eugene Water & Electric Board
F&O	Financial and Operating Reports
FB CRAC	Financial-Based Cost Recovery Adjustment Clause
FBS	Federal Base System
FCCF	Fish Cost Contingency Fund
FCRPS	Federal Columbia River Power System
FCRTS	Federal Columbia River Transmission System
FERC	Federal Energy Regulatory Commission
FERC SR	Federal Energy Regulatory Commission Special Rule
FELCC	Firm Energy Load Carrying Capability
Fifth Power Plan	Council's Fifth Northwest Conservation and Electric
	Power Plan
FPA	Federal Power Act
FPS	Firm Power Products and Services (rate)
FY	Fiscal Year (Oct-Sep)
GAAP	Generally Accepted Accounting Principles
GCPs	General Contract Provisions
GEP	Green Energy Premium
GI	Generation Integration
GSR	Generation Supplied Reactive and Voltage Control
GRI	Gas Research Institute
GRSPs	General Rate Schedule Provisions
GSP	Generation System Peak
GSU	Generator Step-Up Transformers
GTA	General Transfer Agreement
GWh	Gigawatthour
HLH	Heavy Load Hour
HOSS	Hourly Operating and Scheduling Simulator
ICNU	Industrial Customers of Northwest Utilities
ICUA	Idaho Consumer-Owned Utilities Association, Inc.
IOU	Investor-Owned Utility
IP	Industrial Firm Power (rate)
IP IP TAC	Industrial Firm Power Targeted Adjustment Charge
IPC ISO	Idaho Power Company
ISO	Independent System Operator
JP	Joint Party

JP1	Cowlitz County Public Utility District, Northwest Requirements Utilities and Members, Western Public Agencies Group and Members, Public Power Council, Industrial Customers of Northwest Utilities
JP2	Grant County Public Utility District No. 2, Benton County Public Utility District, Eugene Water & Electric Board, Franklin County Public Utility District No. 1, Pacific Northwest Generating Cooperative and Members, Pend Oreille County Public Utility District No. 1, Seattle City Light, City of Tacoma, Western Public Agencies Group and Members, Western Public
	Agencies Group and Members(Grays Harbor)
JP3	Benton County Public Utility District, Eugene Water & Electric
	Board, Franklin County Public Utility District No. 1, Grant
	County Public Utilities District No. 2, Pacific Northwest
	Generating Cooperative and Members, Pend Oreille County Public Utility District No. 1, Seattle City Light, Western Public
	Agencies Group and Members (Grays Harbor)
JP4	Cowlitz County Public Utility District, Eugene Water & Electric
	Board, Pacific Northwest Generating Cooperative and Members,
	Pend Oreille County Public Utility District No. 1, Seattle City
	Light, City of Tacoma, Grant County Public Utility District
	No. 2
JP5	Benton County Public Utility District, Cowlitz County Public
	Utility District, Eugene Water & Electric Board, Franklin
	County Public Utility District No. 1, Grant County Public
	Utilities District No. 2, Northwest Requirements Utilities and
	Members, Pacific Northwest Generating Cooperative and
	Members, Pend Oreille County Public Utility District No. 1,
	Seattle City Light, City of Tacoma, specified members of WA ¹
JP6	Avista Corporation, Idaho Power Corporation, PacifiCorp,
	Portland General Electric Company, Puget Sound Energy, Inc.
JP7	NONE
JP8	Northwest Energy Coalition, Save Our Wild Salmon
JP9	Alcoa, Inc., Industrial Customers of Northwest Utilities, Public
	Power Council, Northwest Requirements Utilities and Members,
	Pacific Northwest Generating Cooperative and Members,
	PacifiCorp, Western Public Agencies Group and Members,
	Avista Corporation, Portland General Electric Company

¹ The members of Western Public Agencies Group and Members (WA) that are participating in the JP5 designation include: Benton REA, the cities of Ellensburg and Milton, the towns of Eatonville and Steilacoom, Washington, Alder Mutual Light Co., Elmhurst Mutual Power and Light Co., Lakeview Light and Power Co., Parkland Light and Water Co., Peninsula Light Co., the Public Utility Districts of Grays Harbor, Kittias, Lewis and Mason Counties, the Public Utility District No. 3 of Mason County, and the Public Utility District No. 2 of Pacific County, Washington.

JP10	Alcoa, Inc., Cowlitz County Public Utility District, Industrial
	Customers of Northwest Utilities
JP11	Cowlitz County Public Utility District, Eugene Water & Electric
	Board, Grant County Public Utilities District No. 2, Pacific
	Northwest Generating Cooperative and Members, Pend Oreille
	County Public Utility District No. 1, Seattle City Light, City of
	Tacoma
JP12	Alcoa, Inc., Industrial Customers of Northwest Utilities, Public
	Power Council, Western Public Agencies Group and Members,
	Northwest Requirements Utilities and Members, Pacific
	Northwest Generating Cooperative and Members
JP13	Columbia River Inter-Tribal Fish Commission, Confederated
	Tribes and Bands of the Yakama Nation, Nez Perce Tribe
JP14	Benton County Public Utility District, Cowlitz County Public
	Utility District, Eugene Water & Electric Board, Franklin
	County Public Utility District No. 1, Grant County Public
	Utilities District No. 2, Industrial Customers of Northwest
	Utilities, Northwest Requirements Utilities and Members,
	Public Power Council, Seattle City Light, City of Tacoma,
	Western Public Agencies Group and Members, Springfield
	Utility Board, Pacific Northwest Generating Cooperative and
	Members
ID15	
JP15	Calpine Corporation, Northwest Independent Power Producers
	Coalition, PPM Energy, Inc., TransAlta Centralia Generation,
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kAf	Thousand Acre Feet
kcfs	kilo (thousands) of cubic feet per second
ksfd	thousand second foot day
kV	Kilovolt (1000 volts)
kW	Kilowatt (1000 watts)
kWh	Kilowatt-hour
LB CRAC	Load-Based Cost Recovery Adjustment Clause
LCP	Least-Cost Plan
LDD	Low Density Discount
LLH	Light Load Hour
LOLP	Loss of Load Probability
m/kWh	Mills per kilowatt-hour
MAC	Market Access Coalition Group
MAf	Million Acre Feet
MCA	Marginal Cost Analysis
Mid-C	Mid-Columbia
MIP	Minimum Irrigation Pool
MMBtu	Million British Thermal Units
MNR	Modified Net Revenues
MOA	Memorandum of Agreement
MOP	Minimum Operating Pool

MORC	Minimum Operating Reliability Criteria
MT	Market Transmission (rate)
MVAr	Market Transmission (rate) Mega Volt Ampere Reactive
MW	Megawatt (1 million watts)
MWh	Megawatt-hour
NCD	Non-coincidental Demand
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Council
NF	Nonfirm Energy (rate)
NFB Adjustment	National Marine Fisheries Service (NMFS) Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp) Adjustment
NIL CL	
NLSL	New Large Single Load
NMFS	National Marine Fisheries Service
NOAA Fisheries	National Oceanographic and Atmospheric Administration Fisheries
NOB	Nevada-Oregon Border
NORM	Non-Operating Risk Model
Northwest Power Act	Pacific Northwest Electric Power Planning and Conservation Act
NPA	Northwest Power Act
NPCC	Northwest Power and Conservation Council
NPV	Net Present Value
NR	New Resource
NR (rate)	New Resource Firm Power (rate)
NRU	Northwest Requirements Utilities
NTSA	Non-Treaty Storage Agreement
NUG	Non-Utility Generation
NWEC	Northwest Energy Coalition
NWPP	Northwest Power Pool
NWPPC	Northwest Power Planning Council
OATT	Open Access Transmission Tariff
O&M	Operation and Maintenance
OMB	Office of Management and Budget
OPUC	Oregon Public Utility Commission
ORC	Operating Reserves Credit
OY	Operating Year (Aug-Jul)
PA	Public Agency
PacifiCorp	PacifiCorp
PBL	Power Business Line
PDP	Proportional Draft Points
PF	-
PFR	Priority Firm Power (rate) Power Function Review
PGE	
PGE PGP	Portland General Electric Company Public Generating Pool
	Public Generating Pool Power Marketing Agencies
PMA	Power Marketing Agencies

DNICA	
PNCA	Pacific Northwest Coordination Agreement
PNGC	Pacific Northwest Generating Cooperative
PNRR	Planned Net Revenues for Risk
PNW	Pacific Northwest
POD	Point of Delivery
POI	Point of Integration/Point of Interconnection
POM	Point of Metering
PPC	Public Power Council
PPLM	PP&L Montana, LLC
Project Act	Bonneville Project Act
PSA	Power Sales Agreement
PSC	Power Sales Contract
PSE	Puget Sound Energy
PSW	Pacific Southwest
PTP	Point-to-Point Transmission
PUD	Public or People's Utility District
RAM	Rate Analysis Model (computer model)
RAS	Remedial Action Scheme
Reclamation	Bureau of Reclamation
Renewable Northwest	Renewable Northwest Project
RD	Regional Dialogue
REP	Residential Exchange Program
RFP	Request for Proposal
RiskMod	Risk Analysis Model (computer model)
RiskSim	Risk Simulation Model
RL	Residential Load (rate)
RMS	Remote Metering System
ROD	Record of Decision
RPSA	Residential Purchase and Sale Agreement
RTO	Regional Transmission Operator
SCCT	Single-Cycle Combustion Turbine
Slice	Slice of the System (product)
SME	Subject Matter Expert
SN CRAC	Safety-Net Cost Recovery Adjustment Clause
SOS	Save Our Wild Salmon
SUB	Springfield Utility Board
SUMY	Stepped-Up Multiyear
SWPA	Southwestern Power Administration
TAC	Targeted Adjustment Charge
TBL	Transmission Business Line
Tcf	Trillion Cubic Feet
TPP	Treasury Payment Probability
Transmission System Act	Federal Columbia River Transmission System Act
TRL	Total Retail Load
Tribes	Columbia River Inter-Tribal Fish Commission, Nez Perce,
111062	
	Yakama Nation, collectively

UAI Charge	Unauthorized Increase Charge
UAMPS	Utah Associated Municipal Power Systems
UDC	Utility Distribution Company
UP&L	Utah Power & Light
URC	Upper Rule Curve
USBR	U.S. Bureau of Reclamation
USFWS	U.S. Fish and Wildlife Service
VOR	Value of Reserves
WAPA	Western Area Power Administration
WECC	Western Electricity Coordinating Council (formally called
	WSCC)
WMG&T	Western Montana Electric Generating and Transmission
	Cooperative
WPAG	Western Public Agencies Group
WPRDS	Wholesale Power Rate Development Study
WSCC	Western Systems Coordination Council (now WECC)
WSPP	Western Systems Power Pool
WUTC	Washington Utilities and Transportation Commission
Yakama	Confederated Tribes and Bands of the Yakama Nation

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1. **INTRODUCTION**

The FY 2009 Load Resource Study (Study) represents the compilation of the load and contract obligations, contract purchases, and resource data necessary for developing BPA's wholesale power rates for FY 2009. The results of this Study are used to: (1) provide data to determine resource costs for the FY 2009 Revenue Requirement Study, WP-07-FS-BPA-10; (2) provide regional hydro data for use in the secondary revenue forecast for the FY 2009 Market Price Forecast Study, WP-07-FS-BPA-11; (3) provide load and resource data for use in the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12; and (4) provide data to derive billing determinants for the revenue forecast in the FY 2009 Wholesale Power Rate Development Study, 10 WP-07-FS-BPA-13.

This Study provides a synopsis of BPA's load resource analysis, and illustrates how each component of the analysis is completed, how components relate to each other, and how each component fits into the rate development process. Details and results supporting this Study are contained in the FY 2009 Load Resource Study Documentation (Documentation), WP-07-FS-BPA-09A.

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2. LOAD RESOURCE STUDY

2.1 18 **Overview of Methodology**

19 This Study includes the following interrelated components: (1) a forecast of the Federal system 20 load obligations comprised of BPA's firm requirements power sales contract (PSC) obligations 21 and other additional BPA contract obligations; (2) Federal system resource estimates that include 22 the output from hydro and other generating resources purchased by BPA and other BPA contract

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purchases; (3) the Federal system load resource balance that relates Federal system sales, loads, and contract obligations to the Federal system generating resources and contract purchases; (4) total Pacific Northwest (PNW) regional hydro resources; and (5) estimated power purchases, in megawatts (MW), that are eligible for section 4(h)(10)(C) credit.

2.1.1 Federal System Load Obligations

The Federal system load obligation forecast estimates the firm energy load that BPA expects to serve during the FY 2009 period under firm requirements PSCs and other BPA contract obligations.

The Federal system firm requirements PSC forecast is composed of load obligation forecasts for public body and cooperative utilities and Federal agencies (collectively called "Public Agencies"), direct service industrial customers (DSIs), investor-owned utilities (IOUs), and other BPA PSC obligations, such as the U.S. Bureau of Reclamation (Reclamation). These obligations are forecast monthly over the period for the generation system peak (GSP) in MW, energy in average megawatts (aMW), heavy load hour energy in megawatthours (HLH MWh), and light load hour energy in megawatthours (LLH MWh). This forecast is provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

BPA also has other contract obligations that are comprised of contracts other than those under
BPA's firm requirements PSC obligations. These other contract obligations include contract
sales to utilities, marketers, and power commitments under the Columbia River Treaty. These
contract obligations are estimated for monthly energy in aMW, HLH MWh, and LLH MWh.
These contract estimates are provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

1 2.1.2 Federal System Resources

The forecast of Federal system resources includes hydro and non-hydro generation estimates plus power deliveries from BPA contract purchases and exchanges.

BPA markets power from generating resources that include Federal and non-Federal hydro 6 projects, other contracted generating projects, and other BPA hydro-related contracts. The 7 combined output from these projects represents most of the Federal system's firm generating resource capability. The Federal system hydro generation is forecast monthly for energy in average megawatts, and is input to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12. The Federal system hydro energy estimate is apportioned to HLH and LLH in the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12. Other non-hydro Federal generation is estimated in this Study for monthly energy in aMW, HLH MWh, and LLH MWh and used as input to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

In addition, BPA has other Federal system resources that are comprised of contract purchases and exchanges, return energy associated with BPA's capacity contracts, return and exchange energy associated with capacity-for-energy exchanges, power purchases, and power commitments delivered to BPA under the Columbia River Treaty. These contract purchases are estimated for monthly energy in aMW, HLH MWh, and LLH MWh. BPA's current resource estimates are incorporated in this Study and are detailed in the Documentation, WP-07-FS-BPA-09A. This data is provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

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2.1.3 Federal System Load Resource Balance

The Federal load resource balance completes BPA's load and resource picture by comparing Federal system load obligations to Federal system resource output for FY 2009. Federal system

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load obligations include BPA's firm requirement PSC obligations and other Federal contract
obligations. Federal system resources include BPA's regulated and independent hydro resources
under 1937 critical water conditions, power deliveries from contract purchases and exchanges,
and other non-hydro and non-utility generating (NUG) projects. The result of the Federal system
resources less loads yields BPA's estimated Federal system monthly firm energy surplus or
deficit. The Federal system surplus/deficit is provided for monthly energy in average megawatts
to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

2.1.4 Pacific Northwest Regional Hydro Generation

Pacific Northwest (PNW) regional hydro resource generation estimates are used for the secondary revenue analysis in the FY 2009 Market Price Forecast Study, WP-07-FS-BPA-11. The regional hydro data includes all PNW regional hydro, plus NUG hydro for FY 2009. The larger set of regional regulated and independent hydro generation is estimated for each of the 50 historical water years of record (October 1928 through September 1978). The regional NUG hydro generation forecast does not vary by water year. The forecast of PNW regional hydro generation is presented for monthly energy in average megawatts for each of the 50 water years.

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2.1.5 Estimate of Section 4(h)(10)(C) Credit

BPA funds actions to protect, mitigate, and enhance fish and wildlife affected by Federal hydro operations, as directed by the Pacific Northwest Electric Power Planning and Conservation Act, 16 U.S.C. §§ 839-839h (Northwest Power Act). These program costs are then allocated to hydro project purposes, both for power and non-power uses. The Northwest Power Act directs BPA to annually recoup its funding of non-power purposes via credits, known as "section 4(h)(10)(C) credits" in reference to the authorizing statutory provisions, so that ratepayers pay only their power share of the fish and wildlife costs. 16 U.S.C. § 839b(h)(10)(C). BPA uses a specific methodology for annually determining the amount of section 4(h)(10)(C) credits that may be available, further discussed in the FY 2009 Revenue Requirement Study, WP-07-FS-BPA-10.

2.2 Federal System Load Obligations Forecast

2.2.1 Overview

The Federal System Load Obligations forecast includes BPA's projected firm requirement PSC obligations to Public Agencies, IOUs, and DSIs; contractual obligations to Reclamation; contractual obligations outside the Pacific Northwest region (exports); and contractual obligations within the Pacific Northwest region (intra-regional transfers-out). The total Federal system load obligation is provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12. Summaries of BPA's forecast of the Public Agency, IOU, and DSI firm requirements PSC obligations are presented in Section 2.2.2 of this Study. BPA's estimates of Federal system PSC obligations and other contract sales components for FY 2009 are summarized in the Documentation, WP-07-FS-BPA-09A, Section 2.3, Table 2.3.1, *Loads and Resources – Federal System*.

The policies and procedures guiding BPA's firm energy sales in the FY 2009 rate period are
presented in BPA's Power Subscription Strategy Administrator's Record of Decision
(Subscription Strategy) published December 1998, and BPA's Policy for Power Supply Role for
FY 2007-2011, Administrator's Record of Decision (Near-Term ROD) published February 2005.
The Subscription Strategy and Near-Term ROD provide the basis for the forecasts of Public
Agency, IOU, and DSI firm requirements PSC obligations presented in this Study.

2.2.2 Public Agency Total Retail Load and Firm Requirement PSC Obligation Forecasts

For FY 2009, the total retail load and firm requirement PSC obligation forecast was not changed from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45. The methods used in producing the total retail load and firm requirement PSC obligation forecasts are as follows.

The Public Agencies' monthly energy firm requirements PSC obligation forecast for utilities that purchased full or partial service products is based on the sum of the utility-specific firm requirements PSC obligation forecasts, which are customarily produced by BPA analysts in the following manner. The monthly total retail load forecasts for the Public Agencies are produced for each utility using linear trend models based on historical annual energy total retail loads. To provide monthly total retail load estimates, each utility's annual total retail load projections are prorated using monthly utility-specific historical relationships. Using the monthly total retail load forecast as a base, each utility's monthly peak total retail load is estimated using utilityspecific average historical load factor relationships of energy to peak. Additionally, the monthly utility energy estimates are further split into HLH and LLH segments using historical relationships.

BPA's firm requirement PSC obligation is calculated for each utility by subtracting its dedicated
resource generation and contract purchase estimates from its total retail load forecast. The
forecast of each utility's firm requirement PSC obligation provides the basis for the Full and
Partial products sales projections incorporated in BPA ratemaking. For those utilities purchasing
Block and Slice Block products, their firm requirement PSC forecast includes the contracted
amount split into appropriate HLH and LLH segments. For customers purchasing Slice Block,
the PSC obligation estimates were reduced by non-Priority Firm agreements such as the
Irrigation Rate Mitigation product.

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Slice is a PSC product that provides firm requirements power and secondary energy to a customer based on its net requirements load for the 10-year period October 1, 2001, through September 30, 2011. It differs from traditional power products in that it is comprised of the following components: (1) firm power deliveries based on the level and shape of the Slice resource stack; and (2) surplus power deliveries on a monthly or seasonal basis as they occur. The Slice product is combined with a sale of a fixed amount of power sold as a Block product. Slice contracts for power deliveries are based on 22.63 percent of the Slice resource stack. The Slice resource stack is comprised of a set of specific Federal resources and contract purchases, net of a specific set of Federal obligations. This particular set of resources and obligations is used only for the Slice product and is not the same as the Federal system resource stack.

Since the Slice resource stack incorporates forecasts of specific Federal system hydro and other generating resources, and contract purchases, less contract obligations, any changes to those components will change the Slice resource stack. For this Study, BPA updated the regulated hydro generation forecast (Section 2.3.2.1, *Regulated Hydro Generation Forecast*) and incorporated generating estimates for the Bonneville Fishway (Section 2.3.2.2, *Independent Hydro Generation Forecast*), necessitating updates to the Slice resource stack and BPA's Slice obligation. For FY 2009, these generating resource updates increased the Slice resource stack by 103 aMW and accordingly increased BPA's Slice obligation by 23 aMW under 1937 critical water conditions.

The aggregate Priority Firm (PF) sales forecast is comprised of the sum of projected PSC obligations for customers purchasing Subscription products. The PF sales forecast was reduced to reflect conservation savings from bilateral contracts. The conservation savings from bilateral contracts is forecast to be a 20 aMW load reduction beginning in FY 2007, with incremental load reductions of 20 aMW per year thereafter, through FY 2013. The conservation savings forecast

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was not changed from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45. For
 FY 2009, the PF sales forecast is reduced by a cumulative 60 aMW for estimated conservation
 savings from bilateral contracts forecast. Table 2.2.2.1, below, presents the FY 2009 PF sales by
 product and total PF sales adjusted for conservation savings.

Table 2.2.2.1 PF Sales Forecast by Product Energy in aMW

	Full	Partial	Block	Slice Block	Slice	TOTAL	Adjusted Total
FY2009	2,110	1,555	616	1,157	1,633	7,071	7,011

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BPA also has other PSC obligations that are not subject to the PF rate schedule. BPA's
pre-Subscription contract obligations are not subject to the PF rate schedule and therefore are not
included in the PF sales forecasts presented above in Table 2.2.2.1. These contracts do represent
BPA PSC obligations and are removed from BPA's resource inventories.

The monthly sales forecasts for energy in aMW, HLH MWh, LLH MWh, and peak demand for the Full Service, Partial Service, Slice/Block, and Block customer groups are presented in the Documentation, WP-07-FS-BPA-09A, section 2.2, Table 2.2.1, *PF Full and Partial Service Sales Forecast* and Table 2.2.2, *Block/Slice Block Sales Forecast*. The customers purchasing each product (Full Service, Partial Service, Slice/Block, and Block) are listed in the Documentation, WP-07-FS-BPA-09A, section 2.2, Table 2.2.3, *Full Service Customers*, Table 2.2.4, *Partial Service Customers*, Table 2.2.5, *Slice/Slice Block Customers*, and Table 2.2.6, *PF Block Service Customers*.

23 WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, Loads and Resources – Federal System, (Federal

Agencies 2002 PSC), (USBR 2002 PSC), (NGP 2002 PSC), and (GPU 2002 PSC). These
Federal system Slice resource obligations are summarized in the Documentation,
WP-07-FS-BPA-09A, section 2.3, Tables 2.3.1 through 2.3.3, *Loads and Resources – Federal System, (NGP Slice Sale)* and (*GPU Slice Sale).* These PSC obligation forecast estimates are
used as inputs for the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

2.2.3 Investor-Owned Utilities Sales Forecast

Based on BPA's current PSCs with the six regional IOUs, BPA forecasts no net requirements
PSC deliveries to regional IOUs for FY 2009. This forecast was not changed from the
WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45. The six IOUs in the PNW region are:
Avista Corporation, Idaho Power Company, NorthWestern Energy Division of NorthWestern
Corporation (formerly Montana Power Company), PacifiCorp, Portland General Electric
Company, and Puget Sound Energy, Inc. BPA will meet any net requirements service of IOUs at
the NR-07 rate. This Study does not contain any New Resource (NR) sales to the IOUs.

For FY 2009, the IOU benefits for this Study were calculated using the Average System Cost
Methodology described in the FY 2009 Wholesale Power Rate Development Study,
WP-07-FS-BPA-13, chapter 8, Average System Cost Forecast.

2.2.4 Direct Service Industry Sales Forecast

BPA's PSC obligations to the DSIs were not changed from the WP-07 Supplemental Initial
Proposal, WP-07-E-BPA-45, and follow the policies adopted in BPA's "Service to Direct
Service Industrial (DSI) Customers for Fiscal Years 2007-2011, Administrator's Record of
Decision," dated June 30, 2005, and the "Supplement to Administrator's Record of Decision on
Bonneville Power Administration's Service to Direct Service Industrial (DSI) Customers for

	l					
1	Fiscal Years 2007-2011," dated May 31, 2006, (Supplemental DSI ROD). Key points in this					
2	Record of Decision are:					
3	1)	The Northwest Power Act permits BPA to offer contracts to meet the DSI loads,				
4		but there is no requirement that it do so;				
5	2)	There is a high likelihood that service benefit contracts with DSI smelters will be				
6		monetized; and				
7	3)	This Study models the benefit of BPA's only non-aluminum DSI customer, Port				
8		Townsend Paper Corporation, as a BPA surplus power sale delivery of 17 aMW				
9		to Clallam County PUD for Port Townsend Paper Corporation service through				
10		September 30, 2011. This delivery is shown as an intra-regional transfer from				
11		BPA to Clallam County PUD and is not included as a DSI PSC load obligation.				
12						
13	BPA will pro	ovide financial benefits to the DSI aluminum smelters for up to 560 aMW for market				
14	purchases such that the DSI's resultant power cost is not less than the PF rate. This assumption					
15	is consistent with the Supplemental DSI ROD.					
16						
17	The Clallam	County PUD contract for Port Townsend Paper Corporation is included as a Federal				
18	system contract obligation. This contract is included monthly for energy in average megawatts					
19	in the Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, Loads and Resources –					
20	Federal System, (Intra-Regional Transfers (Out)). The details of this delivery are presented					
21	monthly for energy in aMW, HLH MWh, and LLH MWh in the Documentation,					
22	WP-07-FS-BPA-09A, sections 2.4 through 2.6, Table A-16, Intra-Regional Transfers (Out) for					
23	the rate period.					
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2.2.5 Other BPA Contract Obligations

BPA provides Federal power to customers under a variety of contract arrangements not included in the Public Agency, IOU, and DSI PSC load obligation forecasts. These contracts are categorized as: (1) power sales; (2) power or energy exchanges; (3) capacity sales or capacity-for-energy exchanges; (4) power payments for services; and (5) power commitments under the Columbia River Treaty. These arrangements are collectively called "Other Contract Obligations," and each can have differing rate structures.

BPA's Other Contract Obligations are assumed to be served by the Federal system firm
resources regardless of weather, water, or economic conditions. These Other Contract
Obligations are modeled individually and are specified or estimated for monthly energy in aMW,
HLH MWh, and LLH MWh.

BPA's Other Contract Obligations for FY 2009 were updated to include several new contracts
that increased BPA's obligations annually by 49 aMW from the WP-07 Supplemental Initial
Proposal, WP-07-E-BPA-45.

Other Contract Obligations are summarized for monthly energy in average megawatts in the
Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, *Loads and Resources – Federal System, (Exports)* and (*Intra-Regional Transfers (Out)*) and are detailed for monthly energy
in aMW, HLH MWh, and LLH MWh in the Documentation, WP-07-FS-BPA-09A, sections 2.4
through 2.6, Table A-2, *Federal Exports* and Table A-16, *Federal Intra-Regional Transfers*(*Out*) for the rate period. These estimates are provided to the FY 2009 Risk Analysis Study,
WP-07-FS-BPA-12.

2.3 Federal System Resource Forecast

2.3.1 Overview

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Federal system resources are comprised of Federal system regulated and independent hydro projects, non-Federally owned independent hydro projects, other non-Federally owned resources (renewable, thermal, wind, and NUG projects), and other Federal contract purchases.

The Federal system regulated hydro resource estimates are derived from BPA's hydro regulation model (HYDSIM), which estimates project generation for each of the 50 water years. Generation estimates for Federal system independent hydro projects are not provided by HYDSIM; rather, they are provided by each project's owner for the 50 water years. Other Federal system resources include non-Federally owned projects from which BPA has acquired the output. These generation estimates are provided either by BPA or by the project's owners. In addition, BPA has signed contracts that are considered Federal system resources. These contracts are comprised of the following: (1) contract purchases and exchanges; (2) return energy associated with BPA's capacity contracts; (3) return and exchange energy associated with BPA's capacity-for-energy exchanges; and (4) power commitments delivered to BPA under the Columbia River Treaty. Detailed Federal system generating resource and contract purchase estimates used in this Study are shown in the Documentation, WP-07-FS-BPA-09A, sections 2.4 through 2.6. These estimates are also provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12.

2.3.2 Federal System Hydro Generation

Federal system hydro resources are comprised of the generation from regulated and independent hydro projects. The process used for estimating the generation of regulated hydro projects is

detailed in Section 2.3.2.1, *Regulated Hydro Generation Forecast*. The methodology for forecasting the generation of independent hydro projects is described in Section 2.3.2.2, *Independent Hydro Generation Forecast*. The Federal system also purchases the output from several small NUG hydro projects. The generation estimates from the NUG hydro projects are provided by the projects' owners and do not vary by water year. The NUG hydro projects are described in Section 2.3.3, *Other Federal System Generation Forecast*.

2.3.2.1 Regulated Hydro Generation Forecast

BPA markets the generation from the Federal system regulated hydro projects. The projects themselves are owned and operated by either the Bureau of Reclamation (Reclamation) or the U.S. Army Corps of Engineers (COE).

BPA used the HYDSIM model to estimate the Federal system energy production that can be expected from regulated hydroelectric power projects in the PNW Columbia River Basin. The hydro energy production is maximized by coordinating hydro operations while continuing to meet power and non-power requirements for the 50 historical water years of record (October 1928 through September 1978). Physical characteristics of each hydro project are provided by annual Pacific Northwest Coordination Agreement (PNCA) data submittals from regional utilities and government agencies involved in the coordination and operation of regional hydro projects. For FY 2009, the hydro regulation study presented in this Study was updated from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45. Details of the process of producing the regulated hydro generation estimates for use in this Study are shown in Section 2.3.2.1.1, PNCA and Fish Requirements, and Section 2.3.2.1.2, Modified Streamflows. Additionally, BPA estimates expected hydro improvement generation increases due to: (1) hydro optimization; (2) turbine runner replacement; and (3) reliability increases through BPA's capital improvement programs at specific Federal regulated hydro projects. These generation increases are not captured in the hydro regulation studies. Hydro improvement generation increases are calculated by multiplying the project's generation estimate by a hydro improvement generation factor specific to that project. The hydro improvement forecast varies by fiscal year and water year. For FY 2009, the hydro improvement estimates were updated from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45.

The regulated hydro generation forecast for FY 2009 increased annually by 82 aMW under 1937 critical water conditions from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45.

The Federal system regulated hydro generation for this Study is summarized in the Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, *Loads and Resources – Federal System (Regulated Hydro)*. The monthly energy in average megawatts for the regulated hydro projects is detailed in the Documentation, WP-07-FS-BPA-09A, section 2.4, Table A-3, *Federal Regulated Hydro Projects*. The combined Federal system regulated and independent hydro energy is provided to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12, which apportions the Federal system hydro energy estimate into HLH and LLH.

2.3.2.1.1 PNCA and Fish Requirements

The BPA HYDSIM studies incorporate the power and non-power operating requirements BPA expects to be effective during the rate period, including those described by the National
Oceanographic and Atmospheric Administration Fisheries (NOAA Fisheries) 2008 Biological
Opinion (BiOp), the United States Fish and Wildlife Service 2006 (USFWS) BiOp, operations

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described in the Northwest Power and Conservation Council's Fish and Wildlife Program, and other fish mitigation measures. Each hydro regulation study specifies particular hydroelectric project operations for fish, such as seasonal flow augmentation, minimum flow levels for fish, spill for juvenile fish passage, reservoir drawdown limitations, and turbine operation efficiency requirements.

Additionally, HYDSIM uses hydro plant operating characteristics in combination with the power and non-power requirements to simulate the coordinated operation of the hydro system. These operating requirements include, but are not limited to, storage content limits determined by rule curves; maximum project draft rates determined by each project; and flow and spill objectives determined by the BiOps, as provided by the 2008 PNCA data submittals. Deviations from the PNCA data submittals occur when specific operating decisions are made subsequent to the date of submission in order to implement the BiOps.

Specific HYDSIM hydro regulation study assumptions are detailed for FY 2009 in the Documentation, WP-07-FS-BPA-09A, section 2.9, HYDSIM Hydro Regulation Study Assumptions, Table 2.9.1, *HYDSIM Assumptions for FY 2009*.

2.3.2.1.2 Modified Streamflows

The HYDSIM model used streamflows from historical years as the basis for estimating power
production of the hydroelectric system. The Actual Energy Regulation (AER) and Operational
HYDSIM studies were developed using the 2000 level of modified historical streamflows.
Historic streamflows are modified to account for the changes over time of the effects of
irrigation and consumptive diversion demand, return flow, and changes in contents of upstream
reservoirs and lakes. These modified streamflows were developed under a BPA contract funded

by the PNCA parties. The modified streamflows are also adjusted to include updated estimates of Grand Coulee irrigation pumping and resulting downstream return flows, using data provided by Reclamation in its 2008 PNCA data submittal. Grand Coulee pumping provides water to the Columbia Basin Project for irrigation.

There are two modes of operation for the HYDSIM hydro regulation studies: refill and continuous. Both modes estimate the energy production of the hydro system; however, each treats a project's initial reservoir conditions differently. Continuous hydro regulation studies operate from one water year to another, using the previous water year's final reservoir elevations as the initial reservoir elevations for the next water year. Refill hydro regulation studies operate each water year, independent of all other water years, using the reservoir's initial storage elevation for each water year. Continuous studies are typically used in BPA mid- to long-range planning to provide expected generation estimates for future years. Refill studies are generally incorporated in short-term planning when information on initial reservoir elevations is known. Hydro regulation studies used in this Study were run in continuous mode.

2.3.2.2 Independent Hydro Generation Forecast

Independent hydro projects are dams that are not modeled or regulated in the HYDSIM model. BPA markets the power from independent hydro projects that are owned and operated by Reclamation, the COE, and/or other project owners. Federal system independent hydro generation estimates are provided by individual project owners for the 50 water years (August 1928 through July 1978). Although the independent hydro generation forecasts are submitted to BPA in operating years, they are presented in fiscal-year format for consistency within this Study. These include power purchased from hydro projects owned by Lewis County Public Utility District (Cowlitz Falls), Mission Valley (Big Creek), and Idaho Falls Power (Idaho

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Falls-Upper Plant, Idaho Falls-City Plant, and Idaho Falls-Lower Plant).

3 For FY 2009, the independent hydro generation estimates for this Study were updated to include 4 the Bonneville Fishway. In the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45, 5 Bonneville Fishway generation estimates were assumed to be included in the total Bonneville 6 dam generation. BPA discovered that this generation was not included, and added the 7 Bonneville Fishway project generation estimates to the independent hydro generation forecast. 8 The inclusion of this project increased Federal system independent hydro generation estimates by 9 21 aMW annually under 1937 critical water conditions.

The Federal system independent hydro generation energy estimates used in this Study are 12 summarized in the Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, Loads and 13 *Resources – Federal System (Independent Hydro).* The monthly energy in average megawatts 14 for the independent hydro projects is detailed in the Documentation, WP-07-FS-BPA-09A, 15 section 2.4, Table A-4, Federal Independent Hydro Projects. The Federal system regulated and 16 independent hydro generation energy is combined and passed to the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12, where the HLH/LLH splits for the Federal system regulated and 18 independent hydro generation are calculated.

20 2.3.3 **Other Federal System Generation Forecast**

Other Federal system generation includes the purchased output from non-Federally owned 22 projects and project generation directly assigned to BPA.

24 For FY 2009, the other Federal system generation projections were not changed from the 25 WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45. For this Study, however, BPA did change the table presentation for BPA-acquired wind generation (Federal system shares of Foote
Creek 1, 2, and 4 wind projects; Stateline wind project, Condon wind project, and
Klondike I and III wind projects) from Table A-24, *Federal Non-Utility Generating Resources by Project*, to Table A-8, *Federal Renewable Resources* from the WP-07 Supplemental Initial
Proposal, WP-07-E-BPA-45. This change did not affect Federal system generation totals and
allows for the consistent treatment and presentation of renewable resource generation whether
owned by BPA, regional utilities, or independent power producers.

The expected other Federal system generation estimates are detailed for monthly energy in aMW, HLH MWh, and LLH MWh and include the following: (1) Georgia Pacific Wauna cogeneration and wind (Federal system shares of Foote Creek 1, 2, and 4 wind projects, Stateline wind project, Condon wind project, and Klondike I and III wind projects (these projects are detailed in the Documentation, WP-07-FS-BPA-09A, sections 2.4 through 2.6, Table A-8, *Federal Renewable Resources*); (2) CGS, which incorporates facility improvements and a two-year refueling cycle (CGS details are shown in the Documentation, WP-07-FS-BPA-09A, sections 2.4 through 2.6, Table A-10, *Federal Large Thermal*); and (3) other projects which include small hydro (Elwha Hydro through January 2, 2012, and Glines Hydro through February 13, 2012, and Dworshak/Clearwater Small Hydropower) and a small amount of solar resources (Ashland Solar Project and White Bluffs Solar). These projects are detailed in the Documentation, WP-07-FS-BPA-09A, sections 2.4 through 2.6, Table A-24, *Federal Non-Utility Generating Resources by Project*.

The other Federal system generation estimates are summarized for monthly energy in average megawatts, in the Documentation, WP-07-FS-BPA-09A, Tables 2.3.1, *Loads and Resources* – *Federal System*, (*Renewables*), (*Large Thermal*), and (*Non-Utility Generation*).

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2.3.4 Other Federal System Contract Purchases

BPA purchases power from sellers under a variety of contractual arrangements to meet Federal load obligations. The contracts are categorized as: (1) power purchases; (2) power or energy exchange purchases; (3) capacity sales or capacity-for-energy exchange contracts; and (4) power purchased or assigned to BPA under the Columbia River Treaty. These arrangements are collectively called "Other Contract Purchases." BPA's Other Contract Purchases are considered firm resources that are delivered to the Federal system regardless of weather, water, or economic conditions.

For FY 2009, BPA's Other Contract Purchases were updated to include 12.7 aMW of BPA trading floor contract purchases from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45.

This Study continues to include for FY 2009 BPA's purchase of 13.4 aMW under the Excess
Requirements Energy (ERE) from some Slice customers in BPA's Other Contract Purchases.
This contract purchase resulted from a Letter Agreement that settled the implementation of
Exhibit N of the Block and Slice Power Sales Agreement for FYs 2008-2011. This contract
expires September 30, 2011.

BPA's expected Other Contract Purchases are summarized for monthly energy in average
megawatts, in the Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, *Loads and Resources – Federal System*, (*Imports*), (*Non-Federal Canadian Entitlement Return for Canada*), and (*Intra-Regional Transfers (In*)). The monthly energy in aMW, HLH MWh, and
LLH MWh is detailed in the Documentation, WP-07-FS-BPA-09A, sections 2.4 through 2.6,
Table A-5, *Federal Imports*, Table A-15, *Canadian Entitlement Return for Canada*, and Table

A-16, *Federal Intra-Regional Transfers (In)* for the rate period. This data is provided to the FY 2009 Risk Analysis Study, WP-FS-BPA-12.

2.4 Federal System Load Resource Balance

2.4.1 Overview

The Federal system load resource balance combines the supporting loads, contracts and resources data used in this Study. The load resource balance compiles the monthly energy amounts of BPA's resources, which include hydro, non-hydro resources, and contract purchases; less BPA's load obligations, which are comprised of BPA's PSC obligations and Other Contract Obligations. This determines BPA's monthly and annual energy load resource balance. If BPA's resources are greater than load obligations under 1937 critical water conditions, BPA has firm surplus energy. Conversely, if BPA's resources are less than load obligations, BPA can purchase power or otherwise secure resources to meet Federal system energy deficits.

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2.4.2 Federal System Energy Load Resource Balance

Table 2.4.2.1 shows that for FY 2009, the Federal system is expected to be in firm energy load resource balance, under 1937 critical water conditions. This includes forecasted annual augmentation purchases of 299 aMW. FY 2009 includes several previously discussed contract obligations, contract purchases, and resource updates that were incorporated in this Study.

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Table 2.4.2.1 1 Loads and Resources - Federal System Federal Firm Energy Surplus/Deficit 2 **Including Estimated Augmentation Purchases Under 1937 Critical Water Conditions** 3 **Energy in aMW** FY 2009 4 Loads **Firm Obligations** 8,550 5 Resources 6 Resources less Transmission Losses 8,251 Augmentation Purchases 299 7 Net Total Resources 8,550 8 Surplus/Deficit Firm Surplus/Deficit 0 9 10 11 The components of the Federal system load resource balance are shown in the Documentation, 12 WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, Loads and Resources – Federal System, (Total 13 *Firm Surplus/Deficit*). Specific augmentation purchase estimates are detailed in the 14 Documentation, WP-07-FS-BPA-09A, section 2.3, Table 2.3.1, Loads and Resources – Federal 15 System (Augmentation Purchases). The supporting data for the Federal system hydro resources, 16 non-hydro resources, and contracts is shown in tables in the Documentation, 17 WP-07-FS-BPA-09A, sections 2.4 through 2.6. The Federal load resource balance and 18 supporting tables are input into the FY 2009 Risk Analysis Study, WP-07-FS-BPA-12. 19 20 2.5 **Regional Hydro Resources** 21 22 2.5.1 Overview 23 This Study produced total PNW regional hydro resource estimates for FY 2009 to provide input 24 into the AURORA Model for the FY 2009 Market Price Forecast Study, WP-07-FS-BPA-11. 25

2.5.2 PNW Regional 50 Water Year Hydro Generation

2 PNW regional hydro resource estimates are one of the inputs into the AURORA Model and are 3 comprised of generation forecasts of the regulated and independent hydro, plus non-utility hydro 4 generation. Regulated hydro generation estimates for this Study were developed, by month, for 5 each of the 50 water years of record (October 1928 through September 1978) using HYDSIM. Independent hydro generation estimates were provided by the project owners for the 50 water 6 7 years (August 1928 through July 1978). The independent hydro data was formatted in fiscal 8 years to be consistent within the Study. Generation estimates for the NUG hydro projects are 9 provided by the individual project owners and do not vary by water year. The regional hydro 10 project resource estimates for FY 2009 were updated from the WP-07 Supplemental Initial 11 Proposal, WP-07-E-BPA-45, incorporating changes in the power and non-power requirements as 12 described in Section 2.3.2, Federal System Hydro Generation.

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For FY 2009, the regional regulated, independent, and NUG hydro generation estimates are summarized for the 50 water years, and are shown in the Documentation, WP-07-FS-BPA-09A, section 2.7, *Total PNW Regional Hydro Resources*, Table 2.7.1, *FY 2009 Total PNW Regional Hydro*.

2.6 Estimate of Section 4(h)(10)(C) Credit

2.6.1 Overview

The Northwest Power Act directs BPA to make expenditures to protect, mitigate, and enhance
fish and wildlife affected by the development and operation of Federal hydroelectric projects in
the Columbia River Basin and its tributaries in a manner consistent with the Power Plan and Fish
and Wildlife Program developed by the Council and other purposes of the Northwest Power Act.
BPA recovers, through rates, the power costs for the Federal dams from which BPA markets

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power. However, BPA ratepayers are not required to pay for costs allocated to non-power uses of the dams. These non-power uses include flood control, irrigation, recreation, and fish and wildlife. The Northwest Power Act provides a methodology for BPA to annually recoup the portion of costs associated with fish measures that should be allocated to other non-power uses of the dams via section 4(h)(10)(C) credits against BPA's Treasury payment. There are three types of section 4(h)(10)(C) credits:

- (1) Direct fish and wildlife program expenditures;
- (2) Capital expenditures for fish and wildlife; and
- (3) Replacement power purchase expenditures resulting from changes in hydro system operations to benefit fish and wildlife.

The non-power purpose portion of these costs is currently calculated at 22.3 percent. In this Study, the estimated non-power portion of the section 4(h)(10)(C) credit is included as BPA revenue. The calculation of the replacement power purchase expenditures resulting from changes in hydro system operations to benefit fish and wildlife are described in Section 2.6.2.

2.6.2 Estimated Power Purchase Megawatts Eligible for Section 4(h)(10)(C) Credit

BPA receives a section 4(h)(10)(C) credit for any portion of additional power purchases it must make to implement fish and wildlife actions. This is done by comparing power purchase estimates between two HYDSIM hydro regulation studies. The first hydro regulation study, termed "With Fish," models hydro system operations using current requirements for fish mitigation and wildlife enhancement for each of the 50 historical water years of record (October 1928 through September 1978). The second hydro regulation study, called "Without Fish," models the hydro system assuming no operational changes were made to benefit fish and wildlife using the same 50 water years. BPA receives a section 4(h)(10)(C) credit for a portion of additional power purchases it must make in order to implement the "With Fish" alternative as

compared to the "Without Fish" alternative. For FY 2009, the section 4(h)(10)(C) credit calculations were changed from the WP-07 Supplemental Initial Proposal, WP-07-E-BPA-45, incorporating updated hydro generation estimates described in Section 2.3.2, *Federal System Hydro Generation*.

A fundamental principle of the section 4(h)(10)(C) credit is that it should not be affected by BPA's marketing decisions. In order for BPA's surplus/deficit situation to not be a function of BPA marketing decisions, BPA uses the load that could have been served with certainty under the "Without Fish" measure operations under the worst energy-producing water condition (1937 critical water conditions). The load BPA can serve with certainty under the worst energyproducing conditions is also known as the Firm Energy Load Carrying Capability (FELCC) of the hydro system in the Pacific Northwest Coordination Agreement planning process. Therefore, it is also the amount of firm load that BPA would have been entitled to sell and is used as a surrogate for load in the section 4(h)(10)(C) power purchases analysis. The Federal load less generation produces Federal surplus/deficit energy amounts under the "Without Fish" and "With Fish" alternatives. Energy deficits result in power purchases. The instances where power purchases are increased from the "Without Fish" alternative in the "With Fish" alternative result in the additional power purchases available for section 4(h)(10)(C) credit.

BPA's period-by-period surplus/deficit situation using the FELCC load obligation assumption for each of the 50 water year streamflow scenarios in the "Without Fish" hydro study was compared to BPA's surplus/deficit situation using the "With Fish" hydro study. The six possible scenarios for each period and water condition are as follows:

(1) "Without Fish" study is deficit and "With Fish" study is more deficit:Leads to more purchases in the "With Fish" study.

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1	(2)	"Without Fish" study is deficit and "With Fish" study is less deficit:		
2		Leads to fewer purchases in the "With Fish" study.		
3	(3)	"Without Fish" study is surplus and "With Fish" study is more surplus:		
4		Leads to more revenues in the "With Fish" study.		
5	(4)	"Without Fish" study is surplus and "With Fish" study is less surplus:		
6		Leads to fewer revenues in the "With Fish" study.		
7	(5)	"Without Fish" study is surplus and "With Fish" study is deficit:		
8		Leads to fewer revenues and more purchases in the "With Fish" study.		
9	(6)	"Without Fish" study is deficit and "With Fish" study is surplus:		
10		Leads to fewer purchases and more revenues in the "With Fish" study.		
11	Scenarios 1, 2	, 5, and 6 result in changing the amount of expected power purchases between the		
12	"Without Fish" and "With Fish" hydro study alternatives. The monthly increases and decreases			
13	in energy purchase amounts, in average megawatts, between these hydro studies are calculated			
14	for each monthly period and water condition. They are shown in the Documentation,			
15	WP-07-FS-BPA-09A, section 2.8, Estimated Purchase MW Eligible For 4(h)(10)C Credit,			
16	Table 2.8.1, $4(h)(10)(C)$ Power Purchase Amounts. These amounts are used as inputs to the			
17	FY 2009 Risk Analysis Study, WP-07-FS-BPA-12, where the AURORA market prices from the			
18	2009 Market I	Power Study, WP-07-FS-BPA-11, are applied to the monthly power purchase		
19	amounts for each of the 50 water years to calculate the monthly power purchase amounts in			
20	dollars. The monthly power purchase amounts are summed for each water year to get an annual			
21	total. The average dollar amount of the annual totals for each of the 50 water years is considered			
22	the section 4(h)(10)(C) credit for Federal hydro system fish operations.			
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