

DOCKETED

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Comments of Bonneville Power Administration Docket #21 -OIR-01

Additional submitted attachment is included below.

**Comments of the Bonneville Power Administration
Docket #21-OIR-01
Request for Information, Power Source Disclosure**

April 14, 2023

By electronic filing

The Bonneville Power Administration (Bonneville) wishes to respond to the request by the Commission for information on feasibility of reporting of hourly sources of electricity and the associated greenhouse gas emissions (GHG) as required by Senate Bill 1158 (Becker).

Bonneville is a Federal Power Marketing Administration, within the United States Department of Energy. Bonneville was created by statute in 1937 with a purpose of marketing and transmitting power generated by various federal projects in the Pacific Northwest. Today Bonneville markets wholesale power from the Federal Columbia River Power System, and Bonneville owns and operates about three-fourths of the Pacific Northwest's high-voltage transmission lines.

Subject to statutory requirements to serve its public preference customers and the Pacific Northwest region, Bonneville markets surplus or excess generation from the federal generation system over the transmission interties to California. Bonneville operates over 8,000 megawatts of high voltage transmission connecting the Pacific Northwest with California. As further background, Bonneville began participation in the Western Energy Imbalance Market (EIM) in May 2022.

Bonneville voluntarily reports to the California Air Resource Board (ARB) as an Asset Controlling Supplier (ACS) and annually calculates the emission factor of its deliveries to California. For sales into California in 2023, Bonneville's ACS emission factor was 0.0174 metric tons of carbon dioxide equivalency per megawatt hour (MT CO₂e/MWh), making Bonneville's deliveries to California nearly carbon-free.

To respond to the questions asked by the Commission for implementation of SB 1158, Bonneville urges the Commission to accept Bonneville's ACS fuel mix and emission factor as the hourly source of generation associated with Bonneville sales into California. It is not feasible for Bonneville to produce hour by hour generation and purchase data for its Federal power system because 1) it appears inconsistent with Bonneville's federal statutory requirements; 2) it is administratively impractical and costly to provide that level of data; and 3) it would result in inconsistent reporting of fuel mix and emission factor across state reporting programs in California and the Pacific Northwest.

By federal statute, Bonneville sells from the aggregated resources of the Federal Columbia River Power System and does not allocate sales from any single generator. This is why Bonneville's ACS emission factor is a system-wide emission factor based on a calculation of all generation from the federal system and all purchases Bonneville makes. This provides a transparent and thorough accounting of emissions associated with the power Bonneville markets. The use of the ACS emission factor has been the practice for accounting in the ARB's administration of California's cap-and-trade market for nearly a decade, and is also utilized by both Oregon and Washington in their respective GHG reporting and GHG emission reduction programs. Above all, it is consistent with the intent of the legislation because it includes all emitting sources (which come only from Bonneville's market purchases) that make up the federal system.

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Attempting to report hourly differences would be administratively infeasible because Bonneville runs the Federal system to respond to total load. It is impractical and inefficient for Bonneville to differentiate dispatches due to load created by sales into California versus dispatches for native load, and, as mentioned above, inconsistent with Bonneville's governing statutes. Providing hourly data would be financially burdensome for Bonneville and in turn for the purchasers of Bonneville's system resources. It would necessitate additional systems and staff for Bonneville to be able to provide this level of reporting. More detailed reporting will not produce commensurate value in the information gained about fuel supply and GHG emissions.

Because of Bonneville's system-wide fuel mix and emission factor, hour by hour generation data will result in reporting of inconsistent fuel mix and emissions compared to the ACS data that Bonneville reports to the ARB. In addition to ramifications for California program administration, this also introduces potential confusion in the state of Washington, where Bonneville sells significant amounts of power. There could be inconsistent claims of power attributes for the respective state requirements. Bonneville urges the Commission to adopt a reporting approach that enables consistent reporting in California and other Western states.

In response to General Question 3 concerning calculation of out-of-state line losses, Bonneville suggests that the Commission apply a two percent line loss for out-of-state deliveries to California. This would be consistent with the ARB's method.

Thank you for this opportunity to comment. Please do not hesitate to contact me for additional information or assistance.

Sincerely,

Rachel Dibble
Vice President, Bulk Marketing