

September 6, 2019

Re: Comments on 2019/2024 Resource Adequacy Assessment

PPC appreciates the opportunity to comment on the 2019/2024 Resource Adequacy Assessment (RAA). We believe that accurate modeling of the power system is an essential component of maintaining and developing a robust regional resource portfolio that can provide cost-effective, reliable power. PPC supports the continued development of the new GENESYS model to reflect system operations and constraints to the greatest possible degree.

However, under the present circumstances, the classic GENESYS model and import constraints should be used for the 2019/2024 RAA. The classic GENESYS model is a vetted and known quantity that is understood by many Northwest stakeholders. Additionally, using the classic model and constraints will allow an apples-to-apples comparison between the 2024 analysis and previous iterations. This consistency will provide for better understanding of the year-to-year changes in the regional power supply.

In terms of the new GENESYS, further analysis of out-of-region market supply, inertia constraints, and intra-regional transmission constraints is necessary. It is vital to conduct further studies and work with regional experts such as BPA to determine what assumptions are reasonable and reflect the conditions that would be found under peak load events.

Specific areas of analysis should include:

- Intertie transmission constraints and flows during normal and peak events;
- Future out-of-region capacity projections (CA, Southwest, Mountain, etc);
- Out-of-region energy and capacity availability in a WECC-wide stress event;
- Intra-regional transmission constraints.

Again, enhancements to the new GENESYS model, including those listed above and possibly others, will allow regional stakeholders to make informed policy choices regarding future risk and reliance upon extra-regional markets. PPC appreciates the

NWPCC's work on Resource Adequacy and looks forward to working together on the issue in the future.