



Transmission Services

Customer Comments on the ACS Straw Proposal

Comments Received from
Iberdrola Renewables

May 29, 2014

Iberdrola Renewables appreciates the opportunity to comment on the BPA Staff Straw Proposal as presented in the ACS Forum meeting on May 13th.

While we anticipate considerable detail will be forthcoming, Iberdrola supports the general direction of the proposal. We are encouraged that the BPA BAA Reliability Tool appears to be reliability-based and signals a movement away from discriminatory wind generation-only cuts.

Iberdrola also supports Bonneville's effort to improve schedule certainty with regard to the wind generators on its system and supports Bonneville's replacement of the Persistent Deviation with Intentional Deviation. With Iberdrola's participation in the Customer Supplied Generation Imbalance Program, we look forward to the opportunity to work with Bonneville to define an agreed-to forecasting metric that would ensure Iberdrola's CSGI fleet would not be subject to the new Intentional Deviation penalties.

Regards,
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