

April 18, 2006 DRAFT



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April 18, 2006

Summary of Comments

For the Issue Paper Entitled
"Resource Adequacy Standard for the Pacific Northwest"
Document Number 2006-01

Public comments received for the Council's issue paper on resource adequacy are summarized below. In some cases, comments have been paraphrased. Response to comments will be provided in a separate document. Entities providing comments are identified in parentheses (key provided below).

Key:

TP	Tacoma Power
BPA	Bonneville Power Administration
PNGC	Pacific Northwest Generating Cooperative
PNUCC	Pacific Northwest Utility Conference Committee
AV	Avista
ICNU	Industrial Customers of Northwest Utilities

- The overall objective should be to assess physical resource adequacy, which would provide an early warning system for the region. (TP)
- This process should not become a regulatory mechanism. (TP)
- The annual load/resource balance is the correct metric to use. (TP, BPA, PNUCC)
- The target should be evaluated often to make sure it remains relevant. (TP)
- Independent Power Producer resources should be included in the load/resource balance assessment. (TP)
- The load/resource balance assessment should include out-of-region resources in some way. (TP)
- Resource adequacy assessments and reviews of the process should continue to be done in a public forum. (TP)

- Each Load Serving Entity (LSE) is ultimately responsible to plan for its own resources. PNGC, TP
- The focus of this effort should be long term (3 to 20 years out). PNGC
- The energy metric should be easily understood. PNGC
- Definitions for counting resources should be absolutely clear. PNGC
- Definitions for how to count resources not yet completed should be absolutely clear. PNGC
- Resource adequacy should be assessed periodically. PNGC
- The “planning adjustment” line item for the load/resource balance does not make any sense. PNGC
- The process should only focus on reporting and not deal with consequences for utilities that do not “measure up.” PNGC
- It is important for the region to complete this effort in a timely manner. BPA
- An “economic” target should also be established. BPA
- IPP generation that is uncommitted should be “derated” by some level. BPA
- Linking the load/resource balance metric to a more sophisticated method of assessing adequacy is appropriate. BPA, TP
- This process should be delayed until all metrics and targets are defined and until a meaningful translation for individual utilities is developed. ICNU
- The Resource Adequacy Forum is a valuable public forum for utilities and others to openly discuss long term planning options. (AV)
- The economic benefits of resource adequacy should be assessed. (AV)
- An independent body, such as the Council, should do regional resource assessment. (AV)
- It should be acknowledged that utilities could meet their own adequacy targets in many different ways. In other words, this process should assess the adequacy status but not provide specific solutions. (AV)
- The spot market should not be relied upon for resource adequacy assessment. (AV)

- Footnotes 6 and 7 seem to contradict each other. Footnote 6 states that all non-hydro resources are to be included in the regional assessment. Footnote 7 states that IPP resources are included only to the extent they are committed to serve regional loads. (AV)
- More analysis regarding fuel supply should be done. (AV)
- Additional analysis and critique is necessary before the region should embrace this proposed energy standard. PNUCC
- The Council and BPA should be commended for spearheading this effort. PNUCC
- The regional metric should not be applied to individual utilities. PNUCC
- This “standard” should not be construed as mandatory. PNUCC
- The Resource Adequacy Forum should broaden its scope. The Forum should document actions currently being taken to ensure there is adequate supply. PNUCC