BP-14 Initial Rate Proposal

Power Rates Study

November 2012

BP-14-E-BPA-01

B O N N E V I L L E   P O W E R   A D M I N I S T R A T I O N

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TABLES

COMMONLY USED ACRONYMS AND SHORT FORMS

AAC	Anticipated Accumulation of Cash
AGC	Automatic Generation Control
ALF	Agency Load Forecast (computer model)
aMW	average megawatt(s)
AMNR	Accumulated Modified Net Revenues
ANR	Accumulated Net Revenues
ASC	Average System Cost
BiOp	Biological Opinion
BPA	Bonneville Power Administration
Btu	British thermal unit
CDD	cooling degree day(s)
CDQ	Contract Demand Quantity
CGS	Columbia Generating Station
CHWM	Contract High Water Mark
COE, Corps, or USACE	U.S. Army Corps of Engineers
Commission	Federal Energy Regulatory Commission
Corps, COE, or USACE	U.S. Army Corps of Engineers
COSA	Cost of Service Analysis
COU	consumer-owned utility
Council or NPCC	Northwest Power and Conservation Council
CP	Coincidental Peak
CRAC	Cost Recovery Adjustment Clause
CSP	Customer System Peak
CT	combustion turbine
CY	calendar year (January through December)
DDC	Dividend Distribution Clause
dec	decrease, decrement, or decremental
DERBS	Dispatchable Energy Resource Balancing Service
DFS	Diurnal Flattening Service
DOE	Department of Energy
DSI	direct-service industrial customer or direct-service industry
DSO	Dispatcher Standing Order
EIA	Energy Information Administration
EIS	Environmental Impact Statement
EN	Energy Northwest, Inc.
EPP	Environmentally Preferred Power
ESA	Endangered Species Act
e-Tag	electronic interchange transaction information
FBS	Federal base system
FCRPS	Federal Columbia River Power System
FCRTS	Federal Columbia River Transmission System
FELCC	firm energy load carrying capability
FHFO	Funds Held for Others

FORS	Forced Outage Reserve Service
FPS	Firm Power Products and Services (rate)
FY	fiscal year (October through September)
GARD	Generation and Reserves Dispatch (computer model)
GEP	Green Energy Premium
GRSPs	General Rate Schedule Provisions
GTA	General Transfer Agreement
GWh	gigawatthour
HDD	heating degree day(s)
HLH	Heavy Load Hour(s)
HOSS	Hourly Operating and Scheduling Simulator (computer model)
HYDSIM	Hydrosystem Simulator (computer model)
ICE	IntercontinentalExchange
inc	increase, increment, or incremental
IOU	investor-owned utility
IP	Industrial Firm Power (rate)
IPR	Integrated Program Review
IRD	Irrigation Rate Discount
IRM	Irrigation Rate Mitigation
IRMP	Irrigation Rate Mitigation Product
JOE	Joint Operating Entity
kW	kilowatt (1000 watts)
kWh	kilowatthour
LDD	Low Density Discount
LLH	Light Load Hour(s)
LRA	Load Reduction Agreement
Maf	million acre-feet
Mid-C	Mid-Columbia
MMBtu	million British thermal units
MNR	Modified Net Revenues
MRNR	Minimum Required Net Revenue
MW	megawatt (1 million watts)
MWh	megawatthour
NCP	Non-Coincidental Peak
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Corporation
NFB	National Marine Fisheries Service (NMFS) Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp)
NLSL	New Large Single Load
NMFS	National Marine Fisheries Service
NOAA Fisheries	National Oceanographic and Atmospheric Administration Fisheries
NORM	Non-Operating Risk Model (computer model)
Northwest Power Act	Pacific Northwest Electric Power Planning and Conservation Act
NPCC or Council	Pacific Northwest Electric Power and Conservation Planning Council
NPV	net present value

NR	New Resource Firm Power (rate)
NT	Network Transmission
NTSA	Non-Treaty Storage Agreement
NUG	non-utility generation
NWPP	Northwest Power Pool
OATT	Open Access Transmission Tariff
O&M	operation and maintenance
OATI	Open Access Technology International, Inc.
OMB	Office of Management and Budget
OY	operating year (August through July)
PF	Priority Firm Power (rate)
PFp	Priority Firm Public (rate)
PFx	Priority Firm Exchange (rate)
PNCA	Pacific Northwest Coordination Agreement
PNRR	Planned Net Revenues for Risk
PNW	Pacific Northwest
POD	Point of Delivery
POI	Point of Integration or Point of Interconnection
POM	Point of Metering
POR	Point of Receipt
Project Act	Bonneville Project Act
PRS	Power Rates Study
PS	BPA Power Services
PSW	Pacific Southwest
PTP	Point to Point Transmission (rate)
PUD	public or people's utility district
RAM	Rate Analysis Model (computer model)
RAS	Remedial Action Scheme
RD	Regional Dialogue
REC	Renewable Energy Certificate
Reclamation or USBR	U.S. Bureau of Reclamation
REP	Residential Exchange Program
RevSim	Revenue Simulation Model (component of RiskMod)
RFA	Revenue Forecast Application (database)
RHWM	Rate Period High Water Mark
RiskMod	Risk Analysis Model (computer model)
RiskSim	Risk Simulation Model (component of RiskMod)
ROD	Record of Decision
RPSA	Residential Purchase and Sale Agreement
RR	Resource Replacement (rate)
RRS	Resource Remarketing Service
RSS	Resource Support Services
RT1SC	RHWM Tier 1 System Capability
RTO	Regional Transmission Operator
SCADA	Supervisory Control and Data Acquisition

SCS	Secondary Crediting Service
Slice	Slice of the System (product)
T1SFCO	Tier 1 System Firm Critical Output
TCMS	Transmission Curtailment Management Service
TOCA	Tier 1 Cost Allocator
TPP	Treasury Payment Probability
Transmission System Act	Federal Columbia River Transmission System Act
TRL	Total Retail Load
TRM	Tiered Rate Methodology
TS	BPA Transmission Services
TSS	Transmission Scheduling Service
UAI	Unauthorized Increase
ULS	Unanticipated Load Service
USACE, Corps, or COE	U.S. Army Corps of Engineers
USBR or Reclamation	U.S. Bureau of Reclamation
USFWS	U.S. Fish and Wildlife Service
VERBS	Variable Energy Resources Balancing Service (rate)
VOR	Value of Reserves
VR1-2014	First Vintage rate of the BP-14 rate period
WECC	Western Electricity Coordinating Council (formerly WSCC)
WIT	Wind Integration Team
WSPP	Western Systems Power Pool

1. INTRODUCTION AND BACKGROUND

1.1 Power Rates Study Overview

The Power Rates Study (Study) explains the processes and calculations used to develop the power rates and billing determinants for BPA's wholesale power products and services. The Study serves three primary purposes: (1) to demonstrate that the rates have been developed in a manner consistent with statutory direction, including the initial allocation of costs and the subsequent reallocations directed by statute; (2) to set rates consistent with agency policy; and (3) to demonstrate that the rates have been set at a level that recovers the allocated power revenue requirement for the upcoming rate period. The rate design process is illustrated in section 1 of the Power Rates Study Documentation (Documentation), BP-14-E-BPA-01A, and described further throughout this Study.

The development of rates in the Study uses inputs from a variety of sources. Loads and resources are provided to the Study by the Power Loads and Resources Study, BP-14-E-BPA-03, and its accompanying documentation, BP-14-E-BPA-03A. Power revenue requirement information is provided by the Power Revenue Requirement Study, BP-14-E-BPA-02, and its accompanying documentation, BP-14-E-BPA-02A. The Power Risk and Market Price Study, BP-14-E-BPA-04, and its accompanying documentation, BP-14-E-BPA-04A, provide the Study with the electricity market price forecasts and forecast quantities of power expected to be sold and purchased in electric markets. These market price forecasts are used in the development of the demand rates, load shaping rates, short-term balancing purchases and expenses, augmentation purchases and expenses, secondary energy sales and revenue, and Planned Net Revenues for Risk (PNRR), if any. The results of the Generation Inputs Study, BP-14-E-BPA-05, are provided to the Study as revenue credits. Explanation and documentation for these credits arising from generation inputs and other inter-business line cost allocations are included in the Generation Inputs Study.

The results of the power rate development process, including rates for power products and services, plus general rate schedule provisions, appear in the Power Rate Schedules, BP-14-E-BPA-09. The revenues resulting from the rates developed herein are used by the Power Revenue Requirement Study in the Revised Revenue Test to test the adequacy of the rates in recovering expenses and supplying adequate cash to cover non-expense cash outlays. Power Revenue Requirement Study, BP-14-E-BPA-02, section 3.3.

1.2 Statutory and Legal Overview

The Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act), 16 U.S.C. § 839, is the most prominent statute providing ratemaking directives to BPA. Section 7(a)(1) states:

> The Administrator shall establish, and periodically review and revise, rates for the sale and disposition of electric energy and capacity and for the transmission of non-Federal power. Such rates shall be established and, as appropriate, revised to recover, in accordance with sound business principles, the costs associated with the acquisition, conservation, and transmission of electric power, including the amortization of the Federal investment in the Federal Columbia River Power System (including irrigation costs required to be repaid out of power revenues) over a reasonable period of years and the other costs and expenses incurred by the Administrator pursuant to this chapter and other provisions of law. Such rates shall be established in accordance with sections 9 and 10 of the Federal Columbia River Transmission System Act (16 U.S.C. § 838) [16 U.S.C. §§ 838g and 838h], section 5 of the Flood Control Act of 1944 [16 U.S.C. § 825s], and the provisions of this chapter.

Section 7(a)(1) directs the Administrator to establish, and periodically review and revise, rates for the sale and disposition of electric energy and capacity and for the transmission of non-Federal power. The

Northwest Power Act defines "periodically review and revise" as revision of power and transmission rates not less frequently than once in every five years. The section also directs that rates recover all of the Administrator's costs, including the repayment of the Federal investment in the Federal Columbia River Power System. Rates also are to be set in accord with two other statutes, the Transmission System Act and the Flood Control Act.

Section 7 directs the allocation of costs, which is performed in a cost of service analysis (see section 2.1 of this Study), and a set of rate directives providing further guidance on how individual rates are to be derived (see section 2.2).

1.2.1 Cost of Service Analysis

Northwest Power Act sections 7(b)(1), 7(d), 7(f), and 7(g) provide guidance to BPA for allocating resource and other costs to load (rate) pools. That guidance is summarized below. See section 2.1 for a full discussion of the implementation of these sections of the Northwest Power Act in the Rate Analysis Model (RAM2014).

Section 7(b)(1) states:

> The Administrator shall establish a rate or rates of general application for electric power sold to meet the general requirements of public body, cooperative, and Federal agency customers within the Pacific Northwest, and loads of electric utilities under section 5(c) of this title. Such rate or rates shall recover the costs of that portion of the Federal base system resources needed to supply such loads until such sales exceed the Federal base system resources. Thereafter, such rate or rates shall recover the cost of additional electric power as needed to supply such loads, first from the electric power acquired by the Administrator under section 5(c) of this title and then from other resources.

Section 7(b)(1) describes how BPA is to allocate resource costs to meet the general requirements of public body, cooperative, and Federal agency customers within the Pacific Northwest and loads of electric utilities participating in the Residential Exchange Program (REP) under section 5(c), collectively called the Priority Firm Power (PF) customer class. At this initial stage of the ratesetting process, the PF rate pool consists of the loads of public bodies and cooperatives (collectively identified as preference customers in section 5(b)), which are combined with Federal agency loads in section 7(b)(1), and the loads of the REP participating utilities.

Section 7(b)(1) instructs that Federal base system (FBS) resources are used to serve the PF rate pool until FBS resources are exhausted. Thus, a corresponding amount of FBS costs is allocated to the PF rate pool. After FBS resources are fully used, resources acquired pursuant to the REP (called exchange resources) are used and then, if needed, new resources are used to serve remaining PF rate load. By allocating resource costs in this order, the appropriate amounts of exchange and new resource costs are allocated to the PF rate pool. The allocation of these costs is discussed in section 2.1.

Section 7(d)(1) states:

> In order to avoid adverse impacts on retail rates of the Administrator's customers with low system densities, the Administrator shall, to the extent appropriate, apply discounts to the rate or rates for such customers.

Section 7(d)(1) thus instructs BPA to apply a Low Density Discount (LDD) to mitigate the costs of customers with relatively fewer customers spread over relatively larger geographic areas. The LDD is discussed in sections 2.1.3.3 and 4.1.1.4.

Section 7(f) states:

> Rates for all other firm power sold by the Administrator for use in the Pacific Northwest shall be based upon the cost of the portions of Federal base system resources, purchases of power under section 5(c) of this title and additional resources which, in the determination of the Administrator, are applicable to such sales.

Section 7(f) sets forth what and how costs are allocated to rates for all other firm power after costs are allocated to the PF rate pool and the rates for BPA's direct-service industrial customers (DSIs) are determined. Section 7(f) allocates the remaining exchange and new resource costs to the remaining regional load (power sold at the New Resources Firm Power (NR) rate and the Firm Power Products and Services (FPS) rate). The allocation of these costs is discussed in section 2.1.

Section 7(g) states:

> Except to the extent that the allocation of costs and benefits is governed by provisions of law in effect on December 5, 1980, or by other provisions of this section, the Administrator shall equitably allocate to power rates, in accordance with generally accepted ratemaking principles and the provisions of this chapter, all costs and benefits not otherwise allocated under this section, including, but not limited to, conservation, fish and wildlife measures, uncontrollable events, reserves, the excess costs of experimental resources acquired under section 6 of this title, the cost of credits granted pursuant to section 6 of this title, operating services, and the sale of or inability to sell excess electric power.

Section 7(g) thus addresses the allocation of costs that are not covered by the previously cited sections of the Northwest Power Act, such as conservation and fish and wildlife costs. The allocation of these costs is discussed in section 2.1.

1.2.2 Rate Directives

Northwest Power Act sections 7(c), 7(b)(2), and 7(b)(3) provide further guidance to BPA for ratesetting. Section 2.2 discusses these rate adjustments in detail.

Section 7(c) in pertinent part states:

> The rate or rates applicable to direct service industrial customers shall be established for the period beginning July 1, 1985, at a level which the Administrator determines to be equitable in relation to the retail rates charged by the public body and cooperative customers to their industrial consumers in the region.

Section 7(c) describes how BPA is to set the rate it charges DSI customers. It provides that the DSI rate will be set to be equitable in relation to retail industrial rates of consumer-owned utility (COU) customers. Section 7(c) provides guidance on how to establish and modify this equitable relationship.

> The [DSI rate] shall be based upon the Administrator's applicable wholesale rates to such public body and cooperative customers and the typical margins included by such public body and cooperative customers in their retail industrial rates but shall take into account the comparative size and character of the loads served, the relative costs of electric capacity, energy, transmission, and related delivery facilities provided and other service provisions, and direct and indirect overhead costs, all as related to the delivery of power to industrial customers, except that the Administrator's rates during such period shall in no event be less than the rates in effect for the contract year ending on June 30, 1985.

Section 7(c) speaks of the "applicable wholesale rates" to consumer-owned utility (COU) customers plus the "typical margins" included by those customers in their retail industrial rates. These parts of the DSI rate are discussed in section 2.2.2 and Appendix A. Section 7(c) also provides for a comparison of the proposed DSI rate to the DSI rate in effect in 1985, known as the floor rate test. The floor rate test is discussed in section 2.2.2.4. Finally, section 7(c)(3) provides:

> The Administrator shall adjust such rates to take into account the value of power system reserves made available to the Administrator through his rights to interrupt or curtail service to such direct service industrial customers.

Section 7(c)(3) thus directs that the DSI rate is to be adjusted to account for the value of power system reserves provided through contractual rights that allow BPA to restrict portions of the DSI load. This adjustment is typically made through a Value of Reserves (VOR) credit. The VOR analysis is discussed in section 3.3.1.1.

In summary, the result of section 7(c) is that the DSI rate is set equal to the applicable wholesale rate, plus the typical margin, minus the VOR credit, subject to the DSI floor rate test. Because the DSI rate interacts with the PF rate and the NR rate, the three rates are determined simultaneously through a solution called the 7(c)(2) Delta. The determination and application of the 7(c)(2) Delta are discussed in section 2.2.2.3.

Section 7(b)(2) states:

> After July 1, 1985, the projected amounts to be charged for firm power for the combined general requirements of public body, cooperative and Federal agency customers, exclusive of amounts charged such customers under subsection (g) of this section for the costs of conservation, resource and conservation credits, experimental resources and uncontrollable events, may not exceed in total, as determined by the Administrator, during any year after July 1, 1985, plus the ensuing four years, an amount equal to the power costs for general requirements of such customers if, the Administrator assumes [five specified assumptions].

Section 7(b)(2) describes a rate test designed to ensure that preference customers' firm power rates are no higher than rates calculated using five assumptions that remove specified effects of the Northwest Power Act. In settlement of many petitions to the U.S. Court of Appeals for the Ninth Circuit challenging BPA's implementation of sections 7(b)(2) and 7(b)(3), the rate test has been implemented through provisions of the 2012 REP Settlement. REP-12-A-03. The 2012 REP Settlement provides a manner by which BPA can compute the amount of rate protection for preference customers, and the amount of REP benefits to the IOUs, in lieu of performing the rate test every rate period.

Section 7(b)(3) in pertinent part states:

> Any amounts not charged to public body, cooperative, and Federal agency customers by reason of [section 7(b)(2)] shall be recovered through supplemental rate charges for all other power sold by the Administrator to all customers.

Section 7(b)(3) directs that the cost of any rate protection arising from implementation of section 7(b)(2) afforded to preference customers is borne by all other BPA power sales. The rate protection does not extend to all PF customers: the public body, cooperative, and Federal agency customers receive the rate protection, but REP participants do not. Thus, to allow the cost reallocations due to the rate protection, the PF rate is bifurcated. The two resulting rates are the PF Public rate, which receives the rate protection, and the PF Exchange rate, which does not receive rate protection and bears its allocated share of the rate protection reallocation. The rate protection amount is collected through additional charges included in rates for all non-PF Public sales. The reallocation of rate protection costs is discussed in sections 2.2.1 and 2.2.3.1. The 2012 REP Settlement retains the allocation of rate protection costs to all other rates through mechanisms specified therein.

1.2.3 Rate Design

Section 7(e) states:

> Nothing in this Act prohibits the administrator from establishing, in rate schedules of general application, a uniform rate or rates for sale of peaking capacity or from establishing time-of-day, seasonal rates, or other rate forms.

BPA rates must follow the ratesetting directives of section 7, but, as characterized in the legislative history of the Northwest Power Act, the rate directives govern the amount of revenue the Administrator collects from each class of customers, but not the rate form. See, for example, H.R. Rep. No. 96-976, Pt. I, 96th Cong., 2nd Sess. at 69 (1980). Section 7(e) reserves rate design (how the revenue is collected) to the Administrator. Rate design is discussed in section 2.3.

1.3 Regional Dialogue Policy Overview

In the Long-Term Regional Dialogue Policy (Policy), issued in July 2007, BPA defined its power supply and marketing role for the long term. Key components of the Policy include 20-year power sales contracts and a tiered PF rate construct that provides each preference customer with a Contract High Water Mark (CHWM), which defines an amount of power the customer has a right to buy at a Tier 1 rate. Any power a utility chooses to buy from BPA for its load in excess of its CHWM is priced at a Tier 2 rate that is designed to recover the marginal cost of serving this additional load.

In October 2008, BPA offered contracts to all of its preference customers and investor-owned utilities. By December 5, 2008, all preference customers and three of seven investor-owned utilities (IOUs) signed the new contracts, which went into effect immediately. Power service under these contracts commenced at the start of fiscal year (FY) 2012. The other four investor-owned utilities have since signed.

In November 2008, BPA issued its Tiered Rate Methodology (TRM) (see section 1.4). Together, the CHWM contracts and the TRM provide long-term certainty to customers regarding their access to Tier 1 rate power and to BPA regarding its obligation to serve its customers' loads.

1.3.1 Regional Dialogue Contract Product Descriptions

Below is a brief summary of the products offered under BPA's CHWM contracts. Please refer to BPA's *Regional Dialogue Guidebook*, available in the Regional Dialogue Policy Implementation section of BPA's Web site, www.bpa.gov, for full product descriptions and additional details on the interactions of the products, Tier 2 rate service, and Resource Support Services (RSS).

Load Following. The Load Following product supplies firm power to meet the customer's Total Retail Load (TRL), less any firm power supplied by the customer from any Dedicated Resources, including "behind the meter" non-Federal resource amounts. The costs associated with the energy and capacity necessary to provide the Load Following service are recovered through Tier 1 rate charges for energy and demand.

Block. The Block product provides a planned amount of firm power to meet a customer's planned annual net requirement load. To buy this product, the customer must have dedicated non-Federal resources, and the customer is responsible for using those resources dedicated to its TRL to meet any load in excess of its planned monthly BPA Block purchase. The costs associated with the energy and capacity necessary to provide this service are recovered through Tier 1 rate charges for energy and demand. No customers elected to purchase the Block-only product in the first or second purchase periods. (The purchase periods are defined in the CHWM contracts and also appear in TRM section 4.3.1; the first is FY 2012-2014, and the second is FY 2015-2019.)

Slice/Block. The Slice/Block product provides a combined sale of two distinct power products: (1) firm power for a customer's net requirements load and an advance sale of surplus energy based on the generation shape of the Federal system; and (2) firm requirements power under a Block product. The costs associated with the energy and capacity necessary to provide this service are recovered through Tier 1 rate charges for energy and demand.

1.4 Tiered Rate Methodology

The TRM provides for a two-tiered PF Public rate design applicable to firm requirements power service for preference customers that signed a CHWM contract. The TRM establishes a predictable and durable means to calculate BPA's PF tiered rates for power deliveries beginning in FY 2012. The tiered rate design differentiates between the cost of service associated with Tier 1 System Resources and the cost associated with additional amounts of power sold by BPA to serve any remaining portion of a customer's net requirement, also referred to as Above-Rate Period High Water Mark (Above-RHWM) load. The tiering of the PF Public rate is one of the final steps in the development of rates and does not alter the fundamental manner in which BPA allocates costs to the various rate pools under the Northwest Power Act. Section 2.3.2 describes the steps taken to tier the Priority Firm rates.

CHWMs, determined according to the TRM, are one basis (others are described later in this section) for determining how much of each customer's net requirement purchased from BPA is charged at Tier 1 rates and how much may be charged at Tier 2 rates. The CHWM for each customer was calculated by BPA in FY 2011 based on the expected output of Tier 1 system resources during FY 2012–2013 and customers' actual FY 2010 loads to set each customer's initial eligibility to purchase power at Tier 1 rates. The individual utility CHWMs were added to each utility's CHWM contract.

Related to the CHWM is the RHWM, which is an expression of the CHWM scaled to the expected output of resources identified as comprising the Tier 1 system for the relevant rate period. Each customer's RHWM for FY 2014–2015 defines that customer's maximum eligibility to purchase at Tier 1 rates for the rate period, limited for Slice and Block customers by the purchaser's Annual Net Requirement and for Load-Following customers by the purchaser's Actual Net Requirement. Each customer's RHWM for FY 2014–2015 was established in a public process that preceded the start of this rate proceeding. The TRM specifies how rates will be developed that ensure, to the maximum extent possible, that customers' purchases of power at Tier 1 rates do not pay any of the costs of serving Above-RHWM load.

To meet its Above-RHWM load, a customer may purchase Federal power, non-Federal power, or a combination of the two. To the extent a customer purchases Federal power for its Above-RHWM load, a PF Tier 2 rate(s) will be applied to this portion of its Federal power service.

1.5 Rate Options Supporting Regional Dialogue Products

1.5.1 Above-RHWM Load Service

A customer may choose to have its Above-RHWM load served as net requirements load by BPA at Tier 2 rates, consistent with the appropriate contractual notice and commitment requirements, which are summarized in the TRM. The Tier 2 rate alternatives currently available are the Tier 2 Load Growth rate, the Tier 2 Short-Term rate, and a Tier 2 Vintage 2014 rate for FY 2015–2019. Additional Tier 2 Vintage rates may be offered in future rate periods. Additional information on the Tier 2 rate alternatives can be found in BPA's *Regional Dialogue Guidebook*. A description of rates for Tier 2 service can be found in Study section 3.1 and in the PF-14 rate schedule.

Alternatively, a customer may add its own non-Federal resources to serve all or part of its Above-RHWM load. The notice and commitment periods for non-Federal resources or purchases are identical to those for purchases from BPA at the Tier 2 Short-Term rate, as specified in the CHWM contract.

1.5.2 Resource Support Services

BPA has developed a suite of Resource Support Services (RSS) and related services for customers' non-Federal resources. These services are priced at Tier 2 rates and include Diurnal Flattening Service (DFS), Forced Outage Reserve Service (FORS), Secondary Crediting Service (SCS), Resource Remarketing Service (RRS), and Transmission Curtailment Management Service (TCMS). Depending on the type of resource and its output, RSS may be required to be purchased from either BPA or non-Federal sources for purposes of matching the resource to a planned shape and amount of load. These services enable BPA to cover the costs of following the variation between planned and actual customer resource amounts and to account for the impact that resource shapes and fluctuations have on BPA's cost to meet its customers' net requirement load. Additional information on the RSS suite of products can be found in Study section 3.1.1.3, BPA's *Regional Dialogue Guidebook,* and the General Rate Schedule Provisions (GRSPs), BP-14-E-BPA-09.

1.6 Rate Period High Water Marks

Each customer's RHWM helps to define that customer's maximum eligibility to purchase at Tier 1 rates for the rate period. The RHWM is determined based on the customer's CHWM and the RHWM Tier 1 System Capability (RT1SC) for each applicable rate period. The determination of a customer's RHWM occurs outside of the rate proceeding in the RHWM Process, as described in TRM section 4.2.1.

The RHWM Process for the FY 2014–2015 rate period was completed in September 2012. BPA completed the Tier 1 System Firm Critical Output Study in May 2012, posted draft RHWMs in June, and conducted a collaborative review process through early August. BPA then posted initial RHWMs on August 9, 2012, conducted a public meeting, and provided a formal public comment period. After completion of the review and comment period, BPA examined the information collected and posted its determination of values for the FY 2014–2015 rate period for RHWM Tier 1 System Capability, including RHWM Augmentation; the monthly/diurnal shape of RHWM Tier 1 System Capability, each customer's RHWM, each customer's Forecast Net Requirement; and each customer's Above-RHWM Load.

The RHWMs and related outputs of the RHWM Process are combined with the load forecast for the applicable 7(i) proceeding in order to calculate billing determinants. Billing determinants affected by the RHWMs include (1) a forecast of power sold at Load Shaping Rates; (2) the TOCAs; (3) Demand; and (4) amounts of power sold at Tier 2 Rates. Additionally, RHWM outputs affect the amount of Unused RHWM to compensate the Composite and Non-Slice cost pools for any value difference between an unused share of the Tier 1 system and the value of a flat annual block of power associated with unneeded system augmentation due to the amount of Unused RHWM. For a description of how values calculated in the RHWM Process are used in the calculation of billing determinants, see section 3.1.5.

Once established, RHWMs are, under most circumstances, not changed. Exceptions include certain changes on a customer's system: annexation; gaining or losing service territory; later discovery that a load is a new large single load; and loss of Provisional CHWM. Provisional CHWM for a customer is an amount of load that a customer had lost prior to FY 2010, the year established as the basis for computing CHWMs, and the customer had reason to believe would return before FY 2014. When CHWMs were being established, each customer that met TRM-specified criteria could request Provisional CHWM. If BPA determined that the criteria were met, the Provisional CHWM was granted and the customer's CHWM for FY 2012-2013 was increased. The RHWM Process preceding the BP-14 rate proceeding established an RHWM for each customer assuming that its Provisional CHWM would be retained.

Section 1.1.1 of Exhibit B of the CHWM contracts specifies that:

> This Provisional CHWM Amount will only be retained if the retention conditions, specified in section 4.1.8 of the TRM, are achieved. BPA shall determine the amount, if any, of «Customer Name»'s Provisional CHWM Amount to be retained. By September 15, 2014, BPA shall revise the table above to include «Customer Name»'s permanent CHWM. «Customer Name»'s permanent CHWM will be effective retroactively to October 1, 2013.

There are 41 customers with a total of 80.617 aMW in Provisional CHWM amounts. During FY 2014, BPA will review the Provisional CHWM amounts using TRM section 4.1.8 to determine how much of the Provisional CHWM amount each customer retains. To the extent the customer meets the TRM criteria, its Provisional CHWM amount will become permanent CHWM. To the extent that the customer does not meet the TRM criteria, its Provisional CHWM amount will be removed.

The removal of all or part of a customer's Provisional CHWM amount necessitates a recomputation of the customer's RHWM and Above-RHWM load for FY 2014-2015. The quantity of RHWM lost is reflected as an increase in Above-RHWM load. The retention of all or part of a customer's Provisional CHWM amount necessitates a recomputation of the customer's Contract Demand Quantity (CDQ); CDQs were not adjusted to reflect Provisional CHWM amounts when the provisional amounts were established.

If a customer's RHWM is reduced during FY 2014 due to loss of a Provisional CHWM amount, the TRM specifies that the customer's power bills, beginning with its October 2013 bill, will be adjusted to reflect the revised RHWM. The reduction in RHWM will be translated into a revised TOCA that will be lower than used on the power bills, and the customer's Tier 1 billing will be reduced. At the same time, the reduction in RHWM will be translated into a revised Above-RHWM load that is larger than what was used before. TRM section 4.1.10 specifies that the customer shall be billed at Load Shaping rates for the increase in Above-RHWM load in FY 2014. Depending on product choices and service elections, customers may have different requirements for FY 2015. See TRM section 4.1.10. The TRM provisions for adjusting a customer's TOCA and rebilling are incorporated in BP-14-E-BPA-09, GRSP II.Y.

If any portion of a customer's Provisional CHWM amount is made permanent, the TRM specifies that the customer's CDQ is revised and power bills, beginning with its October 2011 bill, will be adjusted to reflect the revised CDQ. The billing is retroactive to October 2011 because the demand charges the customer paid during FY 2012-2013 did not reflect the higher CDQ that it would have received if the Provisional CHWM amount had been permanent CHWM during those years. Thus, any CDQ revision will lead to a refund of demand charges to the customer; a customer will not owe BPA more money for the demand adjustment. The TRM provisions for adjusting a customer's demand billing determinants for a CDQ revision and rebilling are incorporated in BP-14-E-BPA-09, GRSP II.D.3.

2. RATESETTING METHODOLOGY AND PROCESS

BPA's ratesetting process for power products and services under the Regional Dialogue contracts has three main steps:

(1) A Cost of Service Analysis (COSA) Step (see section 2.1), which allocates the various types of costs (categorized into resource or cost pools) to the various classes of customers (categorized into load or rate pools) using allocation factors calculated based on loads and resources.

(2) A Rate Directives Step (see section 2.2), which reallocates costs between rate pools to ensure that the relationships between the rates for the different classes of customers comport with the rate directives in the Northwest Power Act.

(3) A Rate Design Step (see section 2.3), which produces tiered PF Public rates that collect the PF Public revenue requirement determined in the Rate Directives Step. This step also implements the rate design for other non-tiered rates, such as IP and NR.

2.1 Cost of Service Analysis Step

The COSA assigns repayment responsibility for ("allocates") BPA's power revenue requirement (grouped into resource pools, also called cost pools) to the various classes of service (grouped into load pools, also called rate pools) based on the resources used to serve those loads, in compliance with statutory directives governing BPA's ratemaking and in accordance with generally accepted ratemaking principles. The COSA and the other ratemaking steps are programmed into a spreadsheet model, RAM2014, for purposes of calculating power rates.

2.1.1 Cost of Service Analysis Modeling

The COSA modeling uses disaggregated customer load data from the source data used to produce the Power Loads and Resources Study, BP-14-E-BPA-03. See PRS Documentation Table 2.1.1. The disaggregated load data are aggregated into the PF rate pool (consisting of two sub-pools, the PF Public (PFp) rate pool and the PF Exchange (PFx) rate pool); the Industrial Firm Power (IP) rate pool; the NR rate pool; and the FPS rate pool. See Documentation Table 2.2.2. The rates charged for service to the various rate pools are associated with specific sections in the Northwest Power Act that describe how costs are to be allocated to those rate pools: the PF rates are section 7(b) rates; the IP rates are section 7(c) rates; and the NR and FPS rates are section 7(f) rates. See section 1.2.

After the load data is input into the RAM2014, the COSA modeling uses the disaggregated resource data from the source data in the Power Loads and Resources Study. See Documentation Table 2.1.2. The disaggregated resource data are aggregated into the resource pools specified by section 7 of the Northwest Power Act. These resource pools are the FBS resource pool, the exchange resource pool, and the new resource pool. See Documentation Table 2.2.2. The resources in the FBS and new resource pools are actual or planned resources that will be able to serve actual load during the rate period. The exchange resources are sized to be equal to the forecast of the eligible REP exchange load during the rate period. To calculate the eligible REP exchange load, the COSA modeling includes a test that determines whether the potential exchanging utilities have Average System Costs (ASC) that are greater than the applicable Base PFx rate for the rate period. See section 2.2.1. Those utilities with higher ASCs will be participating in the REP during the rate period. See Documentation Table 2.1.3. In this way, the modeling determines the PFx load, the size of the exchange resource pool, and the costs of the exchange resources (the ASCs multiplied by the eligible exchange loads).

The aggregated load and resource data is used to calculate energy allocation factors (EAFs) that the COSA modeling will use to apportion costs among rate pools. In order to properly calculate EAFs, loads and resources must equal one another; the RAM2014 tests to ensure that this load-resource balance exists. The EAFs are calculated based on the priorities of service from resource pools to rate pools specified in section 7 of the Northwest Power Act, and based on general principles of cost causation when section 7 does not provide guidance. Section 7(b)(1) directs BPA to allocate the cost of the FBS resources to the PF load pool first. When the FBS resources are not sufficient to serve all PFp and PFx loads, section 7(b)(1) directs BPA to serve the remaining load, first with resources obtained by BPA under section 5(c) of the Northwest Power Act—that is, the exchange resources—and then with new resources, as needed. In this proposal, all of the FBS and a large portion of exchange resources are needed to serve PF loads, and no new resources are needed. After all of the FBS resource costs and the portion of the exchange resource costs are allocated to the PF rate pool, section 7(f) of the Act directs BPA to allocate the cost of the remaining exchange resources and the cost of any other resources, new resources, to all remaining load.

The COSA modeling uses revenue requirement cost data from the Power Revenue Requirement Study. See Documentation Table 2.3.1. The disaggregated cost data is aggregated into BPA's ratemaking cost pools specified by section 7 of the Northwest Power Act. See Documentation Table 2.3.2. Sections 7(b) and 7(f) describe how costs associated with resource pools (FBS costs, exchange resource costs, and new resource costs) are to be allocated to load/rate pools. Section 7(g) describes how the costs associated with the other cost pools (conservation costs, BPA program costs, power-related transmission costs) are to be allocated to load/rate pools.

Functionalization of costs between the generation and transmission functions (BPA does not have a distribution function normal to most utilities) is performed in the Power Revenue Requirement Study and the Transmission Revenue Requirement Study. The costs functionalized to the generation function are included in the power revenue requirement found in the COSA modeling (one exception to this is exchange resource costs; see section 2.1.3.2). As stated above, the exchange resource costs are calculated internal to the RAM2014. These exchange resource costs include transmission function costs. The exchange resource costs are functionalized in the COSA modeling so that only the generation portion of the exchange resource costs is subject to the power cost rate steps, and the transmission cost portion is then added back in after the Rate Directives Step is completed. See Documentation Table 2.3.4.2. In this way, the statutorily mandated power cost relationships between the various rate pools are maintained without being affected by the exchange transmission function costs.

The COSA modeling uses other costs in addition to exchange resource costs that are internally generated by the RAM2014. These include some power purchase costs, revenue shortfall costs associated with some rate credits, and revenues from secondary power sales. These items will be covered in greater detail below.

In addition to cost data, the COSA modeling receives input data associated with various revenue credits. Some of these revenue credits are associated with the operation of FBS resources and have the effect of reducing the FBS resource costs to be recovered by power rates. There are also revenue credits that have the effect of reducing the new resource and conservation costs. Some revenue credits that are not associated with any particular cost pool are allocated to all rate pools on a pro rata load basis. See Documentation Table 2.3.6.

The COSA modeling concludes by using the calculated EAFs to allocate the costs and credits to the rate pools. One further adjustment to the allocated costs is necessary because the costs allocated to the FPS rate pool will not be equal to the expected revenues from FPS contract sales. Therefore, an FPS surplus/deficiency adjustment to the COSA allocated costs is performed before the calculation of initial power rates. See Documentation Table 2.3.9. The initial power rates resulting from the COSA Step are the starting point for the Rate Directives Step modeling in the RAM2014. See Documentation Table 2.3.10.

Sections 2.1.2, 2.1.3, and 2.1.4 provide more detailed explanations to the material summarized here.

2.1.2 Loads and Resources

The sizes of the rate and resource pools are determined based on the results of the Power Loads and Resources Study. The process of allocating power costs begins with an examination of critical period firm loads and resources. After certain adjustments are made, RAM2014 calculates a ratemaking load-resource balance for each year of the rate period. From this ratemaking load-resource balance, RAM2014 determines service to each of the four rate pools (PF, NR, IP, and FPS) from each of the three resource pools (FBS, exchange, and new resources) for the rate period.

The Power Loads and Resources Study distinguishes between PFp load to be served at a Tier 1 price and PFp load that is subject to Tier 2 pricing. The analogous distinction also holds for resources: the Power Loads and Resources Study identifies Tier 1 system resources and resources whose costs will be assigned to Tier 2 cost pools. Notwithstanding this distinction in the input data, the COSA allocations are performed with the tiered loads aggregated as a single PFp load and the newly purchased resources combined into one FBS resource pool. The one exception to this combining of tiered inputs in the COSA calculations is in the calculation of the COU Base PFx rate. This exception is made in order to reflect the CHWM contractual requirement that the COU Base PFx rate, as used to establish whether a COU is eligible to participate in the REP, excludes all Tier 2 resource costs and any Tier 2 loads in its calculation. See Documentation Table 2.4.8. Documentation Table 2.2.1 shows the ratemaking energy loads and resources by pools.

The REP, created by section 5(c) of the Northwest Power Act, was designed to provide residential and small farm customers of Pacific Northwest utilities a form of access to low-cost Federal power. Under the REP, BPA purchases power (exchange resources) from each participating utility at that utility's

ASC. BPA establishes a utility's ASC through a formal ASC Review Process. Once a utility's ASC is established, BPA offers, in exchange, to sell an equivalent amount of electric power (exchange loads) to the utility at BPA's PFx rate. The exchange actually transfers no power to or from BPA, because the "exchange" is an accounting transaction in which dollars are exchanged rather than electric power. However, to ensure proper cost allocations and rate determinations, RAM2014 models the REP as a purchase of power by BPA (priced at the participants' ASCs) and a simultaneous sale of power to the REP participants (priced at the participants' PF Exchange rates).

2.1.2.1 Load and Resource Adjustments

The Power Loads and Resources Study includes a forecast of the generation capability of all resources available to BPA to serve all its load obligations. In order to produce a power ratemaking load-resource balance that includes the amount of resource available to serve the rate pool loads, some adjustments must be made. BPA has certain system obligations, including the Canadian Entitlement, the Hungry Horse reservation, and U.S. Bureau of Reclamation (USBR) Pumping loads (together called FBS obligations), that have existed since before the passage of the Northwest Power Act. FBS resources used to serve these system obligations are "taken off the top," removing both the obligation and a corresponding amount of FBS resource before the ratemaking load-resource balance is calculated.

Similarly, there is an amount of the FBS used to serve a group of power contracts that enhances the amount of FBS available to serve the ratemaking rate pools. These contracts take the form of either a capacity-energy exchange or a seasonal exchange. Each of these types of exchanges is a "sale" of power that is paid for by returning more power than is delivered. In ratemaking, the deliveries and the equivalent returns are removed from consideration, and the energy payment is included in the FBS, increasing the net size of the FBS with power at no added cost. The ratemaking load-resource balance after adjustments is shown in Documentation Table 2.2.2.

2.1.2.2 Load Pools

Load pools (also called rate pools) are groupings of forecast sales into customer classes for cost allocation purposes. The Northwest Power Act establishes three rate pools based on the loads served at particular rates. The 7(b) rate pool includes sales to public body and cooperative customers (consumer-owned utilities), Federal agencies, and utilities participating in the REP. The 7(c) rate pool includes sales to BPA's direct-service industrial customers under contracts authorized by section 5(d) of the Northwest Power Act. The 7(f) rate pool includes three groupings: (1) power sold to COUs that is determined to serve new large single loads; (2) section 5(b) requirements power sold to the region's investor-owned utilities; and (3) all power BPA sells pursuant to section 5(f) of the Northwest Power Act.

The Northwest Power Act states that after July 1, 1985, BPA is not required to allocate any resource costs to the IP rate pool; rather, the IP rate is a formulaic rate established pursuant to section 7(c). However, if DSI loads were excluded from cost allocations, loads and resources would be out of balance, leaving an amount of resource costs not allocated to any loads. Therefore, BPA allocates resource costs to IP loads as it does to all other remaining *(i.e.,* non-PF) firm power sold. Thus, beginning in 1985 with the implementation of the directives of section 7(c)(1)(b) of the Northwest Power Act, BPA has had, for all practical purposes, only two rate pools, the 7(b) rate pool and all other loads. The resource cost allocations to the IP rate pool are adjusted later in the Rate Directives Step to conform the IP rate to its formulaic basis.

2.1.2.3 Resource Pools

The three resource pools are Federal base system resources, exchange resources, and new resources.

Defined in section 3(10) of the Northwest Power Act, the FBS resource pool consists of the costs of the following resources: (1) the Federal Columbia River Power System (FCRPS) hydroelectric projects;

(2) resources acquired by the Administrator under long-term contracts in force on the effective date of the Northwest Power Act; and (3) replacements for reductions in the capability of the above resources. Market purchases of system augmentation, balancing purchases, and purchases designated for Tier 2 rate purposes have been included in the FBS as replacements for reductions in the capability of FBS resources. Costs expected to be incurred during the rate period for FBS replacement resources are included in the FBS resource cost pool.

Exchange resources are set equal to the amount of qualifying exchange load, which implements the direction in section 5(c)(1) that BPA is to purchase resources from each eligible REP participant and sell an equivalent amount of electric power to each participant.

Finally, the new resources pool includes all other resources acquired by BPA, unless such resource has been determined to be a replacement of reduced FBS capability.

2.1.2.4 Order of Resource Service to Load Pools

As noted in section 2.1.1, section 7(b)(1) of the Northwest Power Act specifies how resource costs must be allocated to the Priority Firm Power customer class. That is, FBS resources are used to serve the PF rate pool until FBS resources are exhausted, whereupon exchange resources and then new resources are used to serve remaining PF rate load. Section 7(f) of the Northwest Power Act sets forth what and how costs are allocated to "all other firm power" after costs are allocated to the PF rate pool: the remaining exchange and new resources costs are allocated to remaining load. That remaining load is Industrial Firm Power, New Resource Firm Power, and Firm Power Products and Services contracts.

For the BP-14 rates, the PF load (which at this point consists both of PFp and PFx loads) is greater than the capability of the FBS resources. Therefore, all FBS costs and benefits are allocated to the PF rate pool. Because the remaining PF load is less than the total exchange resource under section 5(c), a pro rata share of exchange resource costs is allocated to the PF rate pool in the amount necessary for the exchange resource to serve the PF load not served by FBS resources. The remaining exchange resources and all new resources and their attendant costs are allocated to all other firm load.

2.1.2.5 Energy Allocation Factors

Energy allocation factors are calculated for each resource pool–rate pool combination by dividing the amount of annual energy load in each rate pool served from each resource pool. The annual EAFs for each resource cost pool and for the rate directive steps are shown in Documentation Table 2.2.3. The Total Usage and Conservation allocation factors assume a pro rata allocation of costs to all firm loads. For example, the Total Usage EAF for costs allocated to the PF load pool is equal to the ratio of PF load to total firm load. The Total Usage and Conservation EAFs are used to allocate some section 7(g) costs and rate directive allocation adjustments to all firm energy loads.

2.1.3 Ratemaking Costs

For ratemaking purposes BPA's costs are allocated to six cost pools. The first three cost pools are associated with BPA's resource pools: FBS costs, exchange resource costs, and new resource costs. These resource-related costs are allocated in accordance with sections 7(b)(1) and 7(f) of the Northwest Power Act. The other three cost pools—conservation costs, BPA program costs, and power-related transmission costs—are allocated in accordance with section 7(g). The PF revenue requirement also adjusted upward due to the expected revenue shortfall caused by the implementation of the Low Density Discount and the Irrigation Rate Discount. See sections 2.1.3.3 and 2.1.3.4.

2.1.3.1 Revenue Requirement

The Bonneville Project Act, the Flood Control Act of 1944, the Transmission System Act, and the Northwest Power Act provide guidance regarding BPA ratemaking. The Northwest Power Act and the other statutes, using similar language, require BPA to set rates that are sufficient to recover, in accordance with sound business principles, the costs of acquiring, conserving, and transmitting electric power, including amortization of the Federal investment in the FCRPS over a reasonable period of years, and the other costs and expenses incurred by the Administrator. See section 1.2.

The Power Revenue Requirement Study is based on power revenue and cost estimates for a two-year rate period, FY 2014-2015. A preliminary generation revenue requirement from the Power Revenue Requirement Study is supplemented in the COSA for costs that are determined in other steps of the ratemaking process: projected balancing purchase power costs; system augmentation costs; Planned Net Revenues for Risk (PNRR), if any; and the functionalized exchange resource costs. The annual revenue requirements used for rate calculations are shown in Documentation Table 2.3.2. Disaggregated costs are listed in a form consistent with the income statement from the Power Revenue Requirement Study and are shown in Documentation Table 2.3.1. RAM2014 uses key code mapping to allocate all costs into the COSA cost pools and the TRM cost pools. Because of the different purposes of the COSA and the TRM, the COSA cost pools due not match the TRM cost pools; however, all costs appear in both sets of cost pools.

Three categories of purchased power are included in the COSA: (1) purchased power, (2) system augmentation, and (3) balancing power purchases.

Purchased Power. The purchased power subset of purchased power costs includes the costs of acquisition of power through renewable energy, wind, geothermal, and competitive acquisition programs. Costs of purchased power are included in the new resources pool.

System Augmentation. For ratesetting purposes, it is assumed that BPA acquires resources beyond the inventory represented by the system generating resources and balancing power purchases. These system augmentation acquisition amounts are determined in the Power Loads and Resources Study and are used to meet annual customer firm power loads in excess of annual firm system resources. The forecast cost of system augmentation purchases is calculated using the average of a range of prices under 1937 water conditions as determined in the Power Risk and Market Price Study, BP-14-E-BPA-04. The expense estimate for system augmentation purchases is based on the application of market prices for the 3,200 games of the Power Risk and Market Price Study associated with 1937 water conditions. System augmentation purchases are treated as FBS replacements, and as such, the costs are included in and allocated as FBS costs. See Documentation Tables 2.3.1 and 2.3.2.

Balancing Power Purchases. The costs of power purchases and storage required to meet firm deficits on a monthly/diurnal basis are included in the category of balancing power purchases. Projected balancing power purchases are generally needed to serve firm loads in months other than the spring fish migration period under some water conditions. The costs of balancing power purchases under 3,200 games of different risk conditions are calculated by the Risk Analysis Model (RiskMod). In the Power Risk and Market Price Study, average balancing purchase quantities are computed and valued in RiskMod against median total balancing purchase costs based upon a Monte Carlo simulation of 3,200 games. The average balancing purchase quantities and median expense dollars are combined to derive an expected balancing purchase price for balancing purchases from RiskMod. These prices and quantities are then passed to RAM2014 to compute balancing purchase costs. Balancing power purchases are treated as FBS replacements, and as such, the costs are included in and allocated as FBS costs. See Documentation Tables 2.3.1 and 2.3.2.

2.1.3.2 Functionalization of Exchange Resource Costs

In the COSA, exchange resource costs are based on participating utilities' ASCs and their exchange power sales to BPA. Each utility's ASC includes the cost of power and transmission services associated with serving that utility's total retail load. By definition, exchange resource sales to BPA equal the exchange sales by BPA. The rate directive adjustments that occur subsequent to the COSA use the results of the COSA allocations of the generation revenue requirement. Therefore, because the exchange resource costs in the COSA include transmission costs, the PF Exchange rate includes a transmission cost adder, and the exchange resource costs are functionalized between power and transmission. The exchange resource costs functionalized to power continue through the ratemaking process. The exchange resource costs functionalized to transmission are removed from the generation revenue requirement for the Rate Directives Step and are added back to determine the PF Exchange rate after the Rate Directives Step is completed. In this way, the exchange resource costs functionalized to power are treated the same as other power function costs through the rate development process. The transmission function costs are collected directly from PFx loads through a transmission adder included in the PFx rate. Because the amount of exchange resource costs functionalized to transmission is equal to the increased revenue due to the PFx rate adder, there is no net cost of these transmission costs to other rates. The functionalization of exchange resource costs is shown in Documentation Table 2.3.4.2.

2.1.3.3 Low Density Discount

Section 7(d)(1) of the Northwest Power Act provides that, in order to avoid adverse impacts on retail rates of BPA's customers with low system densities, BPA shall apply, to the extent appropriate, discounts to the rate or rates for such customers.

The cost of providing the discount is computed in RAM2014 using offset quantities and the internally computed TRM rates. Offset quantities are the sum of the applicable LDD percentages applied to the customer-specific billing determinants. These offsets are computed in the TRM Billing Determinants Model, which is a module of RAM2014.

The estimated cost of the LDD is shown in Documentation Table 2.3.3. The entire cost of the discount is allocated to the PF load pool prior to linking the IP rate to the PF rate.

2.1.3.4 Irrigation Rate Discount

A rate discount is available to qualifying irrigation loads pursuant to CHWM contracts and the TRM. The discount is a rate, expressed in mills per kilowatthour, that when applied to qualified irrigation load produces a dollar credit on eligible customer power bills. The Irrigation Rate Discount rate is calculated in RAM2014, as described in section 3.1.11.1. The cost of the discount is computed in RAM2014 using contract irrigation loads and the internally calculated rate. The entire cost of the IRD is allocated to the PF load pool prior to linking the IP rate to the PF rate.

2.1.3.5 Cost Pools

The COSA has six cost pools for the initial allocation of BPA's power costs: FBS resource costs, exchange resource costs, new resource costs, conservation costs, BPA program costs, and power transmission costs. These costs are allocated to the various customer load classes using direction from sections 7(b)(1), 7(f), and 7(g) of the Northwest Power Act.

2.1.3.5.1 Section 7(b)(1) costs

Section 7(b)(1) costs are associated with the resource cost pools necessary to serve PF load, including the PFp load and the PFx load. For the BP-14 rates, these resources are all of the FBS resources and a large portion of the exchange resources. Therefore, all FBS resource costs and most of the exchange resource costs are section 7(b)(1) costs allocated to serve section 7(b)(1) loads; that is, PF loads.

2.1.3.5.2 Section 7(f) Costs

Section 7(f) costs are associated with the resource cost pools necessary to serve non-PF load, including IP, NR, and FPS loads. For the BP-14 rates, these resources are a small portion of the exchange resources and all of the new resources. Therefore, a small portion of exchange resource costs and all new resource costs are section 7(f) costs allocated to serve all remaining loads; that is, IP, NR, and FPS loads.

2.1.3.5.3 Section 7(g) Costs

Conservation Costs. The Northwest Power Act requires BPA to treat cost-effective conservation savings as a resource in planning to meet the Administrator's obligations to serve loads. The "conservation" line item, as seen in Documentation Tables 2.3.1 and 2.3.2, includes (1) amortization of BPA's previous conservation resource acquisition activities; (2) BPA's continuing contributions to the region's market transformation efforts; (3) costs associated with BPA's energy efficiency business; and (4) a share of Net Revenues (Minimum Required Net Revenues (MRNR) plus PNRR, if any). See Documentation Table 2.3.7.4. Conservation costs are allocated to all rate pools using the Conservation EAFs. See Documentation Table 2.3.4.3.

BPA Program Costs. Some of BPA's program costs are not identified directly with any specific resource pool. An example is the cost of tracking and implementing national energy policies and initiatives. Development of these power program costs occurs in the Integrated Program Review, as described in Power Revenue Requirement Study section 2.1. The power portion appears in the COSA as BPA program costs. BPA program costs are allocated to all rate pools based on the Total Usage EAFs. See Documentation Table 2.3.4.3.

BPA Power Transmission Costs. Power transmission expenses include the costs of serving transfer service customers with Federal power wheeled under GTAs and other non-Federal transmission service agreements over a third-party transmission system. It also includes the costs Power Services incurs to procure transmission and ancillary services to transmit surplus Federal power to purchasers that do not hold transmission contracts, primarily outside the Pacific Northwest. Finally, it includes the costs of the generation-integration segment, as determined in the transmission segmentation study. Transmission costs are allocated to all rate pools based on the Total Usage EAFs. See Documentation Table 2.3.4.3.

2.1.3.6 Planned Net Revenues for Risk

PNRR is an amount of net revenues required from power rates to ensure that cash flows from proposed rates meet BPA's probability standard for repaying Power Services' portion of Treasury payments on time and in full. PNRR may also include an amount of cash required to restore an accumulated negative balance of financial reserves attributed to Power Services. Under the ratemaking methodology, the amount of PNRR is the result of an iterative process among several models: RAM2014, RiskMod, Non-Operating Risk Model (NORM), and ToolKit. See Power Risk and Market Price Study section 3.3. The iteration is initiated with a seed value for PNRR in Documentation Tables 2.3.1 and 2.3.2. The resultant rates are used in RiskMod to produce net revenue probability distributions. These net revenue distributions are then used in the ToolKit to produce a new PNRR value. See Documentation Table 2.3.1. Because the PNRR is zero for the BP-14 rates, no iterative process is required to determine rate levels.

2.1.4 Revenue Credits

2.1.4.1 Downstream Benefits and Pumping Power Revenues

Downstream benefits and pumping power revenues are described in section 4.2. Downstream benefits and pumping power revenues are associated with FBS resources, and these credits are allocated to loads that have been allocated the costs of the FBS. See Documentation Table 2.3.6.

2.1.4.2 Section 4(h)(10)(C) Credits

Section 4(h)(10)(C) credits are described in section 4.4.1. The forecast credit is calculated as described in Power Risk and Market Price Study section 2.6.1 and supplied to RAM2014. Section 4(h)(10)(C) credits are associated with FBS resources, and these credits are allocated to loads that have been allocated the costs of the FBS. See Documentation Table 2.3.6.

2.1.4.3 FBS Contract Obligations Revenue

BPA has certain FBS system obligations that provide revenues. These include the pre-Subscription Hungry Horse reservation power sales contracts and some seasonal exchanges. These FBS system obligation revenues are associated with FBS resources and are allocated to loads that have been allocated the costs of the FBS. See Documentation Table 2.3.6.

2.1.4.4 Colville Credit

The Colville credit is described in section 4.4.2. The Colville credit is associated with FBS resources, and this credit is allocated to loads that have been allocated the costs of the FBS. See Documentation Table 2.3.6.

2.1.4.5 Energy Efficiency Revenues

The Energy Efficiency revenue credit reflects revenues associated with the activities of BPA's Energy Efficiency program. These revenues are generally payments for reimbursable expenditures that are included in the generation revenue requirement. The Energy Efficiency revenue credit is allocated in the same way as BPA's conservation expenses and effectively reduces the amount of those expenses allocated to power rates. See Documentation Table 2.3.6.

2.1.4.6 Miscellaneous Revenues

Miscellaneous revenues are described in section 4.1.8. These revenues are allocated to all firm load through the General Cost EAFs. See Documentation Table 2.3.6.

2.1.4.7 Renewable Energy Certificates

Revenues result from BPA's sales of Renewable Energy Certificates (RECs). The revenue is based on BPA's established price for RECs of $10.25 for FY 2014 and $15.00 for FY 2015 and renewable project output included in the FBS and new resources resource pools. The revenues from Klondike III RECs are allocated to loads that have been allocated the costs of the FBS, and the revenues from new resources renewable resource RECs are allocated to loads that have been allocated the costs of the new resources. See Documentation Table 2.3.6.

2.1.4.8 General Revenue Credits

In the course of marketing power, Power Services generates transmission-related revenues and credits. The revenues and credits are predominantly revenues associated with providing reserves and energy for ancillary services, control area services, and other reliability needs. The Generation Inputs Study explains and documents these credits. Revenues associated with Generation Inputs, Network Wind Shaping, and RSS for non-Federal resources are allocated to all loads through the General Cost EAFs. See Documentation Tables 2.3.7.5 and 2.3.7.6.

2.1.4.9 Secondary Revenue Credits

The Secondary Revenue Credit adjustment recognizes that BPA collects revenues from certain power sales to which costs are not allocated. BPA credits these revenues to classes of service served with firm Federal power.

The ratemaking process described above ensures that the forecast of firm resources available to serve load is equal to BPA's firm load obligations under critical water conditions. However, the ratesetting process also recognizes that better than critical water conditions will most likely occur. Generation from water in excess of critical water conditions is called secondary energy. The projected secondary energy revenue credits are included so that power rates are set at a level such that revenues from all sources do not recover more than the total Power Services revenue requirement.

The sales of energy in excess of firm obligations on a monthly/diurnal basis under 3,200 games of different risk conditions are calculated by RiskMod. Power Risk and Market Price Study, section 2.2.3; see also Documentation Table 2.3.8. Consistent with the Power Risk and Market Price Study, average secondary sales quantities are computed and valued against median total secondary revenues based upon a Monte Carlo simulation of 3,200 games. The average secondary sales quantities and median revenue dollars are combined to derive an expected sales price for secondary energy from RiskMod. These prices and quantities are then passed to RAM2014 to compute secondary energy revenues.

The secondary revenues projected in RiskMod are for market sales expected to be made by BPA and do not include the portion of secondary energy that is expected to be sold to Slice customers. The ratemaking process does not consider product choice by preference customers until the Rate Design Step; therefore, the sales and revenue from RiskMod are "grossed up" to reflect the market value for all secondary energy expected to be produced by Federal generation. See Documentation Table 2.3.8. Section 7(g) of the Northwest Power Act directs that all benefits from the sale of excess electric power not otherwise allocated under section 7 be equitably allocated to power rates in accordance with generally accepted ratemaking principles. Secondary energy revenues are allocated to rate pools based on the FBS and new resources energy allocation factors to credit the revenues against the costs of the resources producing the secondary energy. See Documentation Table 2.3.8.

2.1.5 Surplus Revenue Deficiency/Surplus Reallocation

BPA sells surplus firm power under the FPS rate schedule. The COSA includes these sales in the FPS rate pool and allocates costs to these sales. Sales of such firm power are not necessarily made at rates that recover the exact costs allocated in the COSA to these sales. Therefore, either a revenue surplus or a revenue deficiency will result when a comparison is made between the costs allocated to the sales of this firm power and the revenues received from the sales of such power. The expected revenue forecast from the sale of firm power, the allocated costs, and the resulting revenue deficiency are shown in Documentation Table 2.3.9. This revenue deficiency is allocated to all other firm power (PF, IP, and NR) rates. See Documentation Table 2.3.9.

This is the final step of the COSA. At this point, all of BPA's costs have been allocated to the PF, IP, NR and FPS rate pools, as have all revenues derived from sources other than the PF, IP, NR and FPS rate pools. After completion of the COSA, certain statutory reallocations of these COSA-allocated costs are performed in the Rate Directives Step.

2.2 Rate Directives Step

The Rate Directives Step reallocates costs among load pools to ensure that the relationships between the rates for the different classes of customers comport with the rate directives in the Northwest Power Act.

2.2.1 Rate Directives Step Modeling

The Rate Directives Step modeling takes as input the costs allocated to the four rate pools (PF, IP, NR, and FPS) from the COSA modeling. At this point in the modeling, the allocation of costs to the FPS rate pool is equal to the expected revenues from FPS sales and will not be altered throughout the remaining ratemaking steps. All costs and credits have been allocated to rate pools in the COSA. The Rate

Directives Step will adjust the initial allocations among the PF, IP, and NR rate pools with reallocations of costs that conform with section 7 of the Northwest Power Act.

2.2.1.1 First IP-PF Rate Link

The IP rate for sales of power to BPA's DSI customers is a formula rate tied to the unbifurcated PF rate (*i.e.*, the PF rate at this point in the modeling includes costs that will be allocated between the PFp rate and the PFx rate later in the process). Also at this point in the modeling, the costs allocated to the IP and NR rate pools are equal on a per-megawatthour basis. Therefore, an adjustment is needed to set the IP rate to its proper relationship with the PF rate. That adjustment, the IP-PF Link 7(c)(2) rate adjustment, will reduce the allocated costs to the IP rate pool and increase the costs allocated to the PF and NR rate pools. The IP-PF Link adjustment sets the IP rate to be equal to the monthly/diurnal PFp energy rates applied to DSI billing determinants, plus the net industrial margin. The model first calculates the net industrial margin by subtracting the Value of Reserves provided by sales to the DSIs from the typical industrial margin calculated in the 7(c)(2) Margin Study, Appendix A of this Study. See Documentation Table 2.4.1. Monthly and diurnally differentiated PF melded rates are calculated as described in section 3.1.12. See Documentation Tables 2.4.2 and 2.4.3. Because the IP-PF Link calculation consists of maintaining a set relationship between the levels of the IP and PF rates for each year while simultaneously allocating costs between the two rates, and to avoid multiple iterations, RAM2014 has an algebraic formula to approximate a solution and then uses an intrinsic Excel function, "Goal Seek," to converge to a solution for each year of the rate test period. See Documentation Table 2.4.4.

After the IP-PF Link reallocation, RAM2014 conducts an IP floor rate test to determine if the currently calculated IP rate is below the IP rate that was in effect for the contract year ending on June 30, 1985, as required by section 7(c)(2) of the Northwest Power Act. The currently modeled (BP-14) IP rate at this point in the modeling is not below the IP floor rate, and no floor rate adjustment is needed.

2.2.1.2 Determine Active Exchanging Utilities

With the proper relationship between the IP rate and the unbifurcated PF rate established, the Base PF Exchange rates for the IOUs and the COUs can be calculated. The Base PF Exchange rate for the IOUs is the average unbifurcated PF rate plus a transmission adder. The Base PF Exchange rate for the COUs begins with the IOU rate and removes Tier 2 costs and loads. A test is conducted to determine if the ASCs of the potential IOU and COU exchanging utilities are greater than the IOU and COU Base PF Exchange rates. If a utility's ASC is greater than its Base PF Exchange rate, the utility becomes an active exchanging utility.

2.2.1.3 Calculate 7(b)(2) Rate Protection and 7(b)(3) Reallocations

Once these steps are complete, the next step is to calculate the level of rate protection due to preference customers pursuant to section 7(b)(2) of the Northwest Power Act. The BP-14 rates are calculated pursuant to a settlement of the outstanding litigation associated with the REP and the section 7(b)(2) rate test. 2012 Residential Exchange Program Settlement Agreement, contract no. 11PB-12322 (2012 REP Settlement). The 2012 REP Settlement was previously evaluated for compliance with, among other statutory provisions, sections 7(b)(2) and 7(b)(3).

Rate modeling for the REP under the 2012 REP Settlement begins with total IOU REP benefits, as specified in the 2012 REP Settlement and known as Scheduled Amounts. Added to this total IOU REP benefit amount are the Refund Amounts, also specified in the 2012 REP Settlement. The Refund Amounts are credited back to preference customers in the form of a credit on their power bills. Together these amounts are referred to as REP Recovery Amounts. See Documentation Table 2.4.9.

The REP Settlement rates modeling first calculates the Unconstrained Benefits, which are the REP benefits that would be in place if there was no PFp rate protection. In such circumstance, the REP benefits for each exchanging utility would be its ASC minus its appropriate Base PFx rate multiplied by its qualified exchange load. The Unconstrained Benefits are shown in Documentation Table 2.4.10.

These Unconstrained Benefits are then used to calculate COU REP benefits, as specified in individual settlements with each eligible COU. COU REP benefits are calculated determining a ratio of (i) the IOU Scheduled Amounts plus COU Settlement Amount to (ii) the total IOU Unconstrained Benefits for IOUs. This ratio is then multiplied by COU Unconstrained Benefits to derive COU REP benefits.

The total rate protection provided to preference customers is composed of two parts. With the Unconstrained Benefits and the total IOU and COU REP benefits determined, the first part of rate protection due to preference customers is calculated as the Unconstrained Benefits minus the sum of REP benefits. The REP Settlement modeling then allocates this amount to individual REP participants. Next, the cost of providing Refund Amounts is allocated to the IOU REP participants. The sum of these two specific allocations to each REP participant is divided by the exchange load for each participant, calculating a utility-specific 7(b)(3) Surcharge that is added to the appropriate Base PFx rates to produce a utility-specific PFx rate. See Documentation Table 2.4.11. After the utility-specific PFx rates are calculated, the utility-specific REP benefits are calculated and summed. See Documentation Table 2.4.11.

A second part of rate protection, the REP Surcharge, is calculated and allocated to the IP and NR rate pools. The REP Surcharge is determined by multiplying the REP benefit costs determined above (REP Recovery Amounts plus COU REP benefits) by a scalar specified in the 2012 REP Settlement. The scalar is based on the WP-10 7(b)(3) rate surcharge to the IP and NR rates and changes this historical 7(b)(3) rate surcharge as REP Recovery Amounts change. The REP Surcharge, when multiplied by the forecast sales under the IP and NR rate schedules, produces an amount of rate protection dollars. See Documentation Table 2.4.13. This amount is allocated to the IP and NR rate pools.

The RAM2014 REP Settlement modeling explicitly adjusts dollars among the PFp, PFx, IP, and NR rate pools. The REP Settlement rate protection allocations have the effect of increasing the IP, NR, and PFx rates while decreasing the PFp rate. See Documentation Table 2.4.14.

2.2.1.4 Second IP-PF Rate Link

After the IP and NR adjustment, the now-lower PFp rate and the now-higher IP rate must be adjusted to maintain the proper 7(c)(2) rate directive cost relationship. For this second IP-PF Link calculation, monthly/diurnal PFp energy rates are determined, and the IP rate is set equal to the flat PFp rate plus the net Industrial Margin plus the REP Surcharge. See Documentation Tables 2.4.16, 2.4.17, and 2.4.18.

2.2.2 IP Rate

The IP rate is calculated using directives in sections 7(c)(1), 7(c)(2), and 7(c)(3) of the Northwest Power Act. Section 7(c)(1)(B) provides that, after July 1, 1985, the rates to DSI customers will be set "at a level which the Administrator determines to be equitable in relation to the retail rates charged by the public body and cooperative customers to their industrial consumers in the region." "Equitable in relation" is defined pursuant to section 7(c)(2) as basing the DSI rate on BPA's "applicable wholesale rates" to its COU customers plus the "typical margins" included by those customers in their retail industrial rates. Section 7(c)(3) provides that the DSI rate is to be adjusted to account for the value of power system reserves provided through contractual rights that allow BPA to restrict portions of the DSI load. This adjustment is made through a Value of Reserves credit. Thus, the rate for the DSIs, the IP rate, is set equal to the applicable wholesale rate, plus the typical margin, plus the VOR credit, subject to the DSI floor rate test and the outcome of the determination of PFp rate protection.

2.2.2.1 Applicable Wholesale Rate

The applicable wholesale rate is calculated as the rate(s) at which BPA is selling power to COUs, that is, the PFp rate (for general requirements, as defined in section 7(b)(4) of the Northwest Power Act) and the NR rate (for New Large Single Loads). The IP rate begins by being set to the average of the PF and NR rates, weighted by sales to COUs at each rate and reflecting the DSI class load factor. No sales to COUs at the NR rate are projected for this rate period.

2.2.2.2 Typical Margin, Value of Reserves, and Net Industrial Margin

As noted above, the DSI rate is set by adding the typical margin and VOR credit to the applicable wholesale rate. The typical margin is calculated as described in section 3.3.1.2 and Appendix A. The VOR credit is calculated as described in section 3.3.1.1. The typical margin plus the VOR credit yields the "net industrial margin." The net industrial margin is added to the applicable wholesale rate, and the result is multiplied by the forecast DSI load to determine the allocated costs for the IP rate pool. See Documentation Table 2.4.1.

2.2.2.3 IP-PF Link 7(c)(2) Adjustment

The IP-PF Link 7(c)(2) adjustment is necessary to account for the difference between the revenues expected to be recovered from the DSIs at the final IP rate and the costs allocated to the rate. This difference, known as the 7(c)(2) Delta, is allocated to non-DSI rates, primarily the PF rate. Because the allocation of the 7(c)(2) Delta changes the PF and the NR rates, together forming the applicable wholesale rate upon which the IP rate is based, the 7(c)(2) Delta must be recalculated. The interaction between the applicable wholesale rate and the IP rate has been reduced to an algebraic formula to approximate a solution, and then the RAM uses an intrinsic Excel function, "Goal Seek," to converge to a solution for each year of the rate test period. See Documentation Table 2.4.4.

2.2.2.4 IP Floor Rate Verification

Section 7(c)(2) of the Northwest Power Act requires that the rates to DSI customers shall not be less than the rates in effect for the contract year ending June 30, 1985 (the floor rate). Accordingly, a test is performed to determine if the IP rate is at a level below the 1985 IP rate. If so, an adjustment is made that raises the IP rate to the floor rate and credits other customers with the increased revenue from the DSIs. If the IP rate is set at a level above the floor rate, no floor rate adjustment is necessary.

The first step in calculating the floor rate is to apply the IP-83 Standard rate components to rate period (FY 2014-2015) DSI billing determinants. The resulting revenue figure is divided by total IP rate period energy loads to arrive at an average rate in mills per kilowatthour. This rate is reduced by an Exchange Cost Adjustment and a Deferral Adjustment that were included in the IP-83 rate but are no longer applicable. Both adjustments are made on a mills per kilowatthour basis.

In addition, the transmission component of the IP-83 rate is removed to allow a power-only floor rate comparison. The floor rate is adjusted for transmission costs by subtracting total transmission costs in mills per kilowatthour from the IP-83 rate in the same manner that the Exchange Cost Adjustment and Deferral Adjustment are removed. The mills per kilowatthour component is determined by dividing total transmission costs in the IP-83 rate by the total energy billing determinants for that rate period. See Documentation Table 2.4.6.

These calculations result in an undelivered IP floor rate. The floor rate is applied to the current rate period DSI billing determinants to determine floor rate revenue. Revenue at the proposed IP rates is compared to the revenue at the floor rate. Because the proposed IP rate revenue is greater than the floor rate revenue, no floor rate adjustment is necessary. See Documentation Tables 2.4.6 and 2.4.7.

2.2.3 Section 7(b)(2) Rate Protection

The rate test specified in section 7(b)(2) of the Northwest Power Act ensures that BPA's rates for public body, cooperative, and Federal agency customers (collectively referred to as preference customers or 7(b)(2) customers) are no higher than rates calculated using specific assumptions that remove certain effects of the Northwest Power Act. For BP-14 rates, the rate test was performed in the assessment of the 2012 REP Settlement. The 2012 REP Settlement was found to be in compliance with the rate test, and rates are established pursuant to the 2012 REP Settlement.

2.3 Rate Design Step

The Rate Design Step uses the results of the cost and credit allocations of the COSA Step, as modified by the Rate Directives Step, to develop the rate components that would recover the costs allocated to each rate pool. Three distinct rate designs are developed: (1) a tiered rate design for the PFp rate, in which the Tier 1 rates are designed using customer charges and demand and energy rates; (2) a traditional demand and energy design for the PFp Melded rate, the IP rate, and the NR rate; and (3) a constant annual energy rate for each PFp Tier 2 rate and the PFx rates.

2.3.1 Rate Design Step Modeling

Based on the results of the Rate Directives Step, RAM2014 designs rates for each rate pool. For the PFp Melded rate, the PFx rate, the IP rate, and the NR rate, the rate design can be applied without further processing. The design of the PFp Melded rate is described in section 3.1.12. The design of the PFx rate is described in section 3.2. The design of the IP rate is described in section 3.3. The design of the NR rate is described in section 3.4.

2.3.1.1 TRM Rate Modeling

Additional processing is required before the PFp rate design can becalculated. The allocations of costs and credits performed in the COSA Step and Rate Directives Step are insufficient to inform the rate design of the PFp rate. The TRM specifies a cost allocation methodology to separate costs into the various TRM cost pools in a manner different from the COSA. RAM2014 accomplishes this different cost allocation through a process of mapping disaggregated costs and credits to the TRM cost pools. To provide a crosswalk between the differences between COSA allocations and TRM allocations, the mapping for each is shown within RAM2014, as described below.

The mapping of costs to the TRM cost pools includes costs passed from the Power Revenue Requirement Study, credits passed from the revenue forecast, and cost and credit line items internally computed in RAM2014. Internally computed line items include:

- Costs of IRD and LDD programs.
- Revenues associated with power sales to DSI customers at the IP rate.
- Revenues and costs associated with the Residential Exchange Program:
  - Revenues are calculated at the PFx Rates, incorporating REP surcharges. Loads are included only for customers qualifying for exchange benefits.
  - Costs are calculated using the ASC and exchange load for each qualifying REP participant.
- Revenues associated with power sales at the NR rate.
- System augmentation costs required to achieve annual load-resource balance.
- Balancing power purchase costs required to serve the monthly/diurnal loads of Load Following customers.
- "Balancing" augmentation power purchases associated solely with provision of power at the Load Shaping rate on a net annual basis. (Load Shaping rate loads would equal zero on a net annual basis except that Above-RHWM loads less than one average megawatt are allowed to forgo purchasing at Tier 2 rates and be served at the Load Shaping rate.)

- Secondary energy revenues credit.
- Revenues allocated for Unused RHWMs. See section 3.1.3.2.
- Demand and Load Shaping revenues. See sections 3.1.2.4 and 3.1.2.3.
- Cost of Network real power losses on sales to non-Slice preference customers. See section 3.1.3.1.
- Tier 2 overhead costs and other cost assignments. See section 3.1.4.1.

Once all costs have been mapped into TRM cost pools, the rate design for the PF Public rate can be applied.

2.3.2 PF Public Rate Design Step for Tiered Rates

The rate design for the PFp rate is established in the TRM. The TRM specifies that all costs and credits comprising BPA's total power revenue requirement be allocated to one of four Customer Charge cost pools: Composite, Non-Slice, Slice, or Tier 2. The Tier 2 cost pool is further divided into Short-Term and Load Growth cost pools. After reflecting the cost allocations to other rate pools, the end result of the TRM cost allocations is that the total costs allocated to the four Customer Charge cost pools will equal the total costs allocated to the PFp rate pool in the COSA Step and the Rate Directives Step. Thus, the TRM cost allocations neither increase nor decrease the cost allocations to the PFp rate pool after the Rate Directives Step. A demonstration of this equivalence is shown in Documentation Table 2.5.8.2.

While the TRM cost allocations do not change the costs allocated to the PFp rate pool, they do assign cost responsibility to the rates paid by customers purchasing the three primary products offered in the CHWM contracts: Slice/Block, Load Following, and Block. In addition, the TRM cost allocations also recognize that, even though the ratesetting methodology described in this section 2 is performed as if the REP is an actual purchase and sale of power, at this point in the ratesetting process the PFp rate can be determined based on its allocated share of the total REP benefit costs, rather than exchange resource costs and PFx revenues.

2.3.2.1 Composite Cost Pool

Except for costs and credits that are distinctly associated with a particular primary product, all Tier 1 costs and credits are allocated to the Composite cost pool. The Composite cost pool forms the cost basis for the Composite Customer rate, which is paid by all preference customers with a CHWM contract.

2.3.2.2 Non-Slice Cost Pool

Tier 1 costs and credits, primarily secondary revenues, that are not associated with the Slice product are allocated to the Non-Slice cost pool. The Non-Slice cost pool forms the cost basis for the Non-Slice Customer rate, which is paid by preference customers that have selected the Load Following product or the Block product; it is also paid by customers selecting the Slice/Block product for their Block purchases. In the BP-14 rates there are no customers purchasing the block-only product.

2.3.2.3 Slice Cost Pool

Tier 1 costs and credits that are associated with the Slice product are allocated to the Slice cost pool. The Slice cost pool forms the cost basis for the Slice Customer rate, which is paid by preference customers that have selected the Slice/Block product for their Slice purchases. In the BP-14 rates there are no costs allocated to this cost pool.

2.3.2.4 Tier 2 Cost Pools

Costs and credits that are associated with the sale of power to serve a customer's Above-RHWM load are allocated to Tier 2 cost pools. Generally, the costs allocated to a Tier 2 cost pool are purchase power costs designated by BPA as being for this purpose. In addition to purchase power costs, Tier 2 rates are established to recover Resource Support Services, overhead, and other BPA costs that are not necessarily incurred solely for the purpose of serving Above-RHWM load, but are supportive in part of making such sales. The initial allocation of these other costs is to either the Composite cost pool or the

Non-Slice cost pool. Therefore, the portion of the revenues expected to be received from sales at a Tier 2 rate is reassigned to the cost pool where the initial allocation is made. See Documentation Table 2.5.7.2.

2.4 Rate Modeling Iterations

Several iterations—both internally within RAM2014 and externally between other models and RAM2014—are required before the ratesetting process is finalized. These iterations ensure that the appropriate costs are computed and allocated consistent with the principles of the Northwest Power Act and TRM rate design.

2.4.1 Iterations Internal to the Model

2.4.1.1 Participation in the Residential Exchange Program

Participation in the REP requires that the applicable Base PFx rate is less than a participant's Average System Cost. The applicable Base PFx rate is either the Base Tier 1 PFx rate for COUs or the untiered Base PFx rate for IOUs. If a utility has an ASC less than its applicable Base PFx rate, that utility is ineligible to participate in the REP. RAM2014 uses a macro loop feature to test whether, for each year of the exchange period, each utility with an ASC qualifies for the REP. If a utility does not qualify, a binary index is used to exclude it, and if it does qualify, the index is set to include it. This test is done such that the exchange resource costs are calculated including the resources purchased from only REP participants, and before the Rate Directives Step of the 7(c)(2) linking of the IP and PF rates, the determination of rate protection, and subsequent reallocation of rate protection.

2.4.1.2 Costs of Rate Discounts

The costs of the LDD and IRD (see sections 2.1.3.3 and 2.1.3.4) are mathematically related to Composite, Non-Slice, and Slice customer charges, and these charges are dependent on REP benefits and IP and NR revenues. LDD and IRD costs are indeterminate until final charges are set; however, since final charges are in part dependent upon the costs associated with these other factors, iteration in the model is necessary. As explained in sections 2.1.3.3 and 2.1.3.4, RAM2014 computes the cost of the LDD based on offset quantities and the IRD rate based on a historical percentage, which are applied to internally computed customer charges. For each iteration of the model, the appropriate charges are applied, and new discount costs are computed. These new discount costs are allocated in the COSA Step, and the Rate Directives Step and TRM Step are performed again. New charges and rates are computed, which are again applied to the discount calculations. The iterative process continues until convergence.

2.4.1.3 Contract Formula Rates

If a power sales contract rate was computed based on the results of rate modeling, an iterative approach might be required to solve for the amount of revenue to be credited in the COSA Step. No internal iterations are currently required to model contracts at formula rates.

2.4.2 Iterations External to the Model

Some aspects of the ratesetting process are dependent upon the rates computed in RAM2014. Many of these dependencies have been integrated within RAM2014, as described above. Other dependencies are simply too large to incorporate into one model. Thus, external iterations must be performed before rates can be finalized.

2.4.2.1 Consumer-Owned Utility Average System Costs

The ASCs of COUs participating in the REP are based in part on the cost of power purchased from BPA at rates determined in RAM2014. In addition, the amount of Refund Amount that the COU will receive is also dependent upon the COU's TOCA. These two factors require a recomputation of ASCs for COUs based on the PFp rate level and the Refund Amount. This iteration is manually performed between RAM2014 and the ASC forecast model. Revised ASCs are included in RAM2014, and rate levels are recomputed until the results converge.

2.4.2.2 Risk Analysis and Mitigation: PNRR

PNRR is an amount of net revenues required from power rates to ensure that cash flows from proposed rates meet BPA's Treasury Payment Probability (TPP) standard. The amount of PNRR is the result of an iterative process among four models: RAM2014, RiskMod, NORM, and ToolKit. See Power Risk and Market Price Study section 3.3. The iterative process is initiated with a seed value for PNRR in revenue requirement used in RAM2014. The resultant rates are used in RiskMod and NORM to produce distributions of net revenues. These distributions are then used in the ToolKit to produce a new PNRR value for the RAM2014 revenue requirement. See Documentation section 2. Because PNRR is determined to be zero, no iterative process is required to determine rate levels for the BP-14 rates.

2.4.2.3 Revised Revenue Test

The revenue forecast quantifies the expected level of sales and revenue from power rates and other sources for the rate period, FY 2014-2015. Two revenue forecasts are prepared, one with current rates and the other with proposed rates. These forecasts are used to test whether current rates will recover the generation revenue requirement and, if not, whether proposed rates are sufficient to recover the generation revenue requirement. The revenue test is described in section 4 of this Study and in Power Revenue Requirement Study section 3.3. The power rates placed in effect October 1, 2011, are used in the calculation of revenue at current rates for FY 2014-2015, using the load forecast from the Power Loads and Resources Study.

The rates as computed in RAM2014 are applied to the same loads to create a revenue forecast at proposed rates for FY 2014-2015. The revenue from this forecast is shown in Documentation Table 4.2. These revenues are incorporated into the revenue test in Power Revenue Requirement Study section 4 to determine if the proposed rates are sufficient to recover the revenue requirement. If the rates are not sufficient, an adjustment to the rates is required to increase the rates to a level sufficient to recover the revenue requirement.

The revised revenue test demonstrates that the BP-14 rates are sufficient to recover the revenue requirement, and no further rate adjustment is needed. See Power Revenue Requirement Study section 4.

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3. RATE DESIGN

As described in section 1.2.3, the Administrator retains a considerable amount of discretion in designing rates, as long as the rates meet the requirements of section 7 of the Northwest Power Act.

Rate design is applied after BPA has allocated its total power revenue requirement to five rate pools: Priority Firm Public Power, Priority Firm Exchange Power, Industrial Firm Power, New Resources Firm Power, and Firm Power Products and Services. Rate design does not change the amount of the revenue requirement that is allocated to each of the five rate pools. Rather, rate design determines how the revenue requirement is to be collected through rates for each of the five rate pools. One purpose of rate design is to target the revenue collection within a particular rate pool and to distinguish between different types of service and power consumption of individual wholesale power customers. Another purpose is to provide price signals to customers to encourage more-efficient power usage and differentiate between the relative market value of the products and services BPA offers to its customers.

This section of the Power Rates Study describes the rate design for peaking capacity use, time-of-day use, and seasonal use of power purchased from BPA under its Priority Firm Power (PF-14), Industrial Firm Power (IP-14), and New Resources Firm Power (NR-14) rate schedules.

There are three Priority Firm Power rates: the PFp rate, the PFx rate, and the Priority Firm Melded rate. PFp rate design is applicable to purchases by public bodies, cooperatives, and Federal agencies pursuant to CHWM contracts. The PFx rate design is applicable to purchases by utilities pursuant to a Residential Purchase and Sale Agreement (eligible consumer-owned utilities) or Residential Exchange Program Settlement Implementation Agreement (eligible investor-owned utilities). The PF Melded rate design is applicable to purchases by public bodies, cooperatives, and Federal agencies pursuant to power sales contracts other than a CHWM contract. No sales under the PF Melded rate are forecast during the rate period, FY 2014-2015.

The PFp rate design is based on the design set forth in the Tiered Rate Methodology, BP-12-A-03. The TRM established a rate design for the PFp rate schedule to be used for power sales under BPA's CHWM contracts.

The PFx rate schedule is also described in this section. Due to the annual design of the Residential Exchange Program, application of a PFx rate schedule rate design that included rate differentiation for peaking capacity use, time-of-day use, and seasonal use of power purchased from BPA was deemed unnecessary.

The TRM did not establish a rate design for the PFx, IP, and NR rate schedules. The rate design for IP and NR service is described in this Study, and the specific rates are set forth in the Power Rate Schedules, BP-14-E-BPA-09. Certain PFp design elements adopted in the TRM are used in the IP-14 and NR-14 rate design, in particular the method for scaling Energy rates from the market forecast and the general method for calculating the Demand billing determinant.

3.1 Priority Firm Public Rate Design

As described in the TRM, the PFp rate design includes two tiers. The tiering of the rates is a ratemaking construct that allocates the costs and credits functionalized to power; it is not an allocation of power to customers. The costs and credits functionalized to power are allocated to the Tier 1 and Tier 2 cost pools based upon the principle of cost causation. The forecast costs and credits allocated to Tier 1 cost pools are kept separate and distinct from those allocated to the Tier 2 cost pools.

In addition to creating the Tier 1 and Tier 2 cost pools, the TRM also determined a rate design for the Tier 1 rates. Tier 1 rates include three customer charges: the Composite Customer Charge, the Non-Slice Customer Charge, and the Slice Customer Charge. These charges recover the costs allocated to their respective cost pools. The rate for each of the customer charges is a dollar amount per each one percentage point of the billing determinant. For each customer charge, each customer's billing determinant will respectively be its Tier 1 Cost Allocator (TOCA), Non-Slice TOCA, or Slice Percentage. In addition to the customer charges, the Tier 1 rates include 24 monthly/diurnal Load Shaping rates and a Demand Charge with 12 monthly Demand rates.

Tier 2 rates coincide with the three Tier 2 rate options elected by customers to meet their Above-RHWM load obligation. In PF-14 these are the Tier 2 Short-Term, Load Growth, and VR1-2014 rates. The VR1-2014 rate is the first Tier 2 Vintage rate offered under the CHWM contracts.

Two other rates are calculated based on the TRM "component" rates. First is the PFp Tier 1 Equivalent Rate for use in contracts that have rates that are tied to a traditional PF HLH/LLH rate design. Second, a PFp Melded rate schedule is included should BPA need to serve load of a preference customer that does not have a CHWM contract.

3.1.1 PFp Customer Cost Pools

Under the TRM, there are three Tier 1 cost pools (Composite, Non-Slice, and Slice) and the possibility of multiple Tier 2 cost pools. For the FY 2014-2015 rate period there are three Tier 2 cost pools: Short-Term, Load Growth, and VR1-2014. The method by which costs and credits are allocated among the six PFp cost pools is directed by the TRM. Costs and credits are allocated among the cost pools based on the association of the cost or credit with a product (Load Following, Block, or Slice/Block) and a tier (Tier 1 or Tier 2). The Composite cost pool includes all Tier 1 costs and credits that are not otherwise allocated to the Slice and Non-Slice cost pools. The Slice cost pool includes only those costs and credits that are specifically and uniquely attributed to the Slice product. Likewise, the Non-Slice cost pool includes only those costs and credits that are specifically and uniquely attributed to the Load Following and Block products (including the Block portion of the Slice/Block product). The Tier 2 Short-Term, Load Growth, and VR1-2014 cost pools include all costs and credits that are attributable to the resources and services necessary for load served at a Tier 2 rate. Additional detail on these cost pools is found in section 3.1.7 below.

To calculate the Tier 1 and Tier 2 rates, all costs and credits are allocated to the appropriate cost pools; all costs functionalized to generation are allocated to one of the six PFp cost pools (Composite, Non-Slice, Slice, Short-Term, Load Growth, and VR1-2014). As described in section 2.1, the same costs and credits have also been allocated to the PF rate pool and the IP, NR, and FPS rate pools. To account for the costs and credits allocated to the rate pools other than PF, the revenues recoverable from those rate pools have reduced the costs allocated to the Composite cost pool. A demonstration is included in RAM2014 that shows that the revenue requirement allocated to the PFp rate pools in the COSA equals the costs and credits allocated to the PFp cost pools after the reductions from the other rate pools. See Documentation Tables 2.5.7.1 and 2.5.7.2.

Once costs and rate design revenue credits have been balanced with the revenue requirement, to the extent necessary additional adjustments to the PFp cost pools are made to avoid cost shifts among products (Load Following, Block, and Slice/Block), and tiers (Tier 1 and Tier 2). These rate design adjustments move dollars from one cost pool to another through equal credits and debits and do not change the overall revenue requirement or the cost allocations among PF, IP, NR, and FPS. These rate design adjustments include three adjustments made within Tier 1 (section 3.1.3) and one adjustment made between Tier 1 and Tier 2 (section 3.1.4). The three adjustments made within Tier 1 are the Transmission Loss Adjustment, the Firm Surplus and Secondary Adjustment from Unused RHWM, and the Balancing Augmentation Adjustment. The one adjustment made between Tier 1 and Tier 2 is the

Tier 2 Overhead Adjustment. The Tier 2 Balancing Adjustment, which was used in the BP-12 rates, is not necessary for the BP-14 rates. The complete allocation of costs with all revenue credits and adjustments for the six cost pools can be found in Documentation Table 2.3.5, and TRM allocation of cost pool adjustments can be found in Documentation Table 2.5.6.

3.1.2 Rate Design Revenue Credits

The Composite and Non-Slice cost pools contain credits for revenues collected from other components of the PFp rates. The Composite cost pool includes a credit for forecast revenue collectable from the sale of Resource Support Services. The Non-Slice cost pool includes a credit for forecast revenue collectable through the Load Shaping, Demand, and Resource Shaping charges. All of these rate design credits are necessary to ensure that the PFp rates do not over-collect the allocated revenue requirement and that the costs and credits have been allocated as specified in the TRM.

3.1.2.1 Resource Support Services (RSS) Revenue Credit

BPA provides five RSS options that generate revenue from preference customers. Revenue received from RSS is credited to the Composite cost pool. For transparency purposes, BPA committed in the TRM to apply applicable RSS to resources serving system augmentation needs (currently Klondike III) and to resources supporting the Tier 2 rates, if appropriate. In these situations, the source of the RSS revenue credit to the Composite cost pool is provided either through an RSS adder to the system augmentation cost or an RSS cost within a Tier 2 cost pool.

The total annual RSS revenue credit for FY 2014-2015 can be found in Documentation Table 3.1.

3.1.2.2 Resource Shaping Charge (RSC) Revenue Credit

All balancing purchase costs, either resource or load, are allocated to the Non-Slice cost pool. The RSC collects additional revenue for balancing purchase costs associated with balancing resources against a flat annual block. To pair cost allocation with revenue collection of balancing purchase costs, the forecast RSC revenue credit is applied to the Non-Slice cost pool.

BPA committed in the TRM to apply RSS and the RSC to resources serving system augmentation needs (Klondike III) and to resources supporting the Tier 2 rates in order to make these acquisitions financially equivalent to a flat block. See TRM section 8. In these situations, the source of the RSC revenue credit is provided either through an RSC adder to the system augmentation cost or through an RSC adder within a Tier 2 cost pool. The forecast annual RSC revenue credit for FY 2014-2015 can be found in Documentation Table 3.1.

3.1.2.3 Load Shaping Revenue Credit

The Load Shaping charge is designed to recover costs associated with shaping the firm output of the Tier 1 System Resources to the monthly/diurnal shape of a customer's Tier 1 Load. The Load Shaping charge is applicable to Non-Slice products, Block (including the Block portion of the Slice/Block), and Load Following, but not the Slice portion of the Slice/Block product. Thus, as stated in TRM section 5.2, forecast revenue from the Load Shaping charge is credited to the Non-Slice cost pool by means of the Load Shaping Revenue Credit.

3.1.2.4 Demand Revenue Credit

The Demand charge is designed to send a price signal to a limited portion of a customer's overall demand on BPA and is applicable to customers purchasing Load Following and Block with Shaping

Capacity products. Thus, forecast revenue from the Demand charge is credited to the Non-Slice cost pool by means of the Demand Revenue Credit.

3.1.3 Rate Design Adjustments Made between Tier 1 Cost Pools

3.1.3.1 Transmission Loss Adjustments

The Transmission Loss Adjustments provide a credit to the Composite cost pool and an equal debit to the Non-Slice cost pool based on Non-Slice transmission losses. The Transmission Loss Adjustments account for different accounting of transmission losses to the Slice/Block and Non-Slice products. The Non-Slice products and the Block portion of the Slice/Block products are delivered to the purchaser's load service area, while the Slice product is delivered to the purchaser at BPA's generation bus bar. The cost of generating the real power losses for the transmission of Non-Slice sales is included in BPA's revenue requirement. Conversely, the cost of generating the real power losses for the transmission of Slice sales is borne by the purchaser. The Transmission Loss Adjustments transfer the cost of generating the real power losses for the transmission of Non-Slice PF sales from the Composite cost pool to the Non-Slice cost pool. The Transmission Loss Adjustments are calculated by multiplying the network losses associated with the Non-Slice PF products, including the Block portion of the Slice/Block product, by the Average Slice and Non-Slice Tier 1 rate (see Documentation Table 2.5.6). The calculation and result of the Transmission Loss Adjustments can be found in Documentation Table 2.5.3.

3.1.3.2 Firm Surplus and Secondary Adjustments from Unused RHWM

Unused RHWM occurs when a customer's Forecast Net Requirement is less than its RHWM. The Firm Surplus and Secondary Adjustments from Unused RHWM reallocate costs between the Composite cost pool and the Non-Slice cost pool.

Unused RHWM reduces the need for system augmentation and/or increases firm power available for sale in the market. The reduced augmentation expenses and/or increased firm power market revenues are reflected in three lines on the TRM cost table: (1) Augmentation Power Purchases; (2) Secondary Revenue; and (3) Balancing Purchases. See Documentation Table 2.5.1. The Augmentation Power Purchases line is part of the Composite cost pool, while the Secondary Revenue and Balancing Purchases are part of the Non-Slice cost pool. In order to share the entire benefit of Unused RHWM to all customers, both the Composite and Non-Slice cost pools contain a Firm Surplus and Secondary Adjustment (from Unused RHWM), with one reflecting a credit and the other an equal debit.

The Firm Surplus and Secondary Adjustments have two purposes. One purpose is to reflect the difference between the value of a flat annual block of system augmentation and the value of the Unused RHWM when the Unused RHWM displaces augmentation. The difference between a flat annual block of system augmentation and the shape of the Unused RHWM is reflected in changes in the assumed balancing purchases and associated costs. These changes in balancing purchase costs are captured in the Non-Slice cost pool. A Firm Surplus and Secondary Adjustment reallocates this change in balancing purchase costs associated with this difference in value from the Non-Slice cost pool to the Composite cost pool.

The second purpose of the Firm Surplus and Secondary Adjustments is to reflect the full value of the Unused RHWM when the Unused RHWM creates firm surplus power. The revenue associated with this change in firm surplus power related to the Unused RHWM is reflected in the secondary revenue credit in the Non-Slice cost pool. A Firm Surplus and Secondary Adjustment reallocates this change in secondary revenues associated with the Unused RHWM from the Non-Slice cost pool to the Composite cost pool.

The value of Unused RHWM consists of portions of RHWM Augmentation, Tier 1 System Firm Critical Output, and an associated portion of secondary energy. Each of these three components is valued at its respective price: the Augmentation price for the RHWM Augmentation component, the market price (as expressed by the Load Shaping rates) for the Tier 1 System Firm Critical Output component, and the market price (as expressed by the average price received for secondary sales) for the secondary component. The value of Unused RHWM (expressed in dollars per megawatthour) also will be calculated for use in the Slice True-Up of the Firm Surplus and Secondary Adjustment line item in the Composite cost pool.

See Documentation Table 2.5.2 for results and calculation of the Firm Surplus and Secondary Adjustments from Unused RHWM and the dollar per megawatthour Slice True-Up value of Unused RHWM.

3.1.3.3 Balancing Augmentation Load Adjustments

Balancing augmentation load is (1) Above-RHWM load that is forecast to be served at Load Shaping rates, rather than at Tier 2 rates or with a non-Federal resource (net positive load shaping billing determinants); (2) load that is forecast to be served at Tier 2 rates or with a non-Federal resource, rather than at the appropriate Tier 1 rates (net negative Load Shaping billing determinants); or (3) changes to the Tier 1 System during the applicable 7(i) ratesetting process from that used to establish each customer's allocation of the Tier 1 System during the applicable RHWM Process.

The sum total of these conditions for FY 2014 is a charge to the Composite cost pool (and an offsetting credit to the Non-Slice cost pool). The sum total of these conditions for FY 2015 is a credit to the Composite cost pool (and an offsetting charge to the Non-Slice cost pool). See Documentation Table 2.5.6.

3.1.3.3.1 Above-RHWM Load that is Forecast to be Served at Load Shaping Rates

This first condition occurs when Above-RHWM load is forecast to be served at Load Shaping rates either when a Load Following customer's annual Above-RHWM load is less than 8,760 MWh and the Load Following customer made no alternative election to serve its Above-RHWM load, or when Above-RHWM load is locked down in the RHWM Process and the load forecast is updated during the rate proceeding to reflect the forecast of a larger load. When this is the case and the amount of system augmentation purchases is equal to or greater than the amount of balancing augmentation load, the acquisition costs attributable to supplying balancing augmentation load are included as a system augmentation expense in the Composite cost pool. The revenue from supplying balancing augmentation load is credited to the Non-Slice cost pool through the Load Shaping charge revenue credit. Without a Balancing Augmentation Load Adjustment, only Non-Slice customers would receive a credit through an increased Load Shaping Charge revenue credit, but both Slice and Non-Slice customers would bear the cost of an increased system augmentation expense. The Balancing Augmentation Load Adjustment corrects this inequity with a credit to the Composite cost pool and an equal debit to the Non-Slice cost pool.

This case causes the sum of Load Shaping billing determinants to be positive. The Balancing Augmentation Load Adjustments to the Composite and Non-Slice cost pools are calculated as the lesser of the sum of the Load Shaping billing determinants for each fiscal year or the augmentation amount for each fiscal year. The result is multiplied by the augmentation price for the respective fiscal year.

3.1.3.3.2 Load that is Forecast to be Served at Tier 2 Rates or with a Non-Federal Resource

This second condition occurs when load that would otherwise be served at Tier 1 rates is served at Tier 2 rates or with a non-Federal resource when Above-RHWM load is locked down and the load forecast is updated during the rate proceeding to reflect the forecast of a smaller load.

When this is the case, there is a reduction in system augmentation expenses from what would have otherwise occurred. The Composite cost pool would have received an implicit reduction in costs due solely to load variation attributable to Non-Slice customer loads. In this case, the Balancing Augmentation Adjustment is a debit to the Composite cost pool and an equal credit to the Non-Slice cost pool.

This causes the sum of the Load Shaping billing determinants to be negative. The Balancing Augmentation Load Adjustments to the Composite and Non-Slice cost pools are calculated as the greater of (1) the sum of the Load Shaping billing determinants for each fiscal year and (2) the avoided augmentation amount for each fiscal year. The result is multiplied by the augmentation price for the respective fiscal year.

3.1.3.3.3 Changes to the Tier 1 System During the Applicable 7(i) Ratesetting Process

This third condition occurs when the T1SFCO used for the calculations of the RHWMs is updated in the 7(i) proceeding, which results in an updated Tier 1 System output. Any difference resulting from the updated calculation of the Tier 1 System output in the rate proceeding will cause either a cost or a credit to be included in the Balancing Augmentation Load Adjustment. This is included as an addition to the Balancing Augmentation Adjustment, and not in the Balancing Power Purchase costs computed in RiskMod, since movements in the updated Tier 1 System output will increase or decrease on an annual-average basis the amount of Augmentation required, but is considered Balancing Power Purchases under the TRM. RiskMod computes Balancing Power Purchase costs after load-resource balance has been achieved under critical water. See section 3.3 of the TRM. If the size of the Tier 1 System output increases relative to the RHWM Tier 1 System output, the Non-Slice cost pool will receive a credit for this additional anticipated energy. Alternatively, if the size of the Tier 1 System output decreases, the Non-Slice cost pool will be charged for the reduction in anticipated energy. Customers purchasing the Slice/Block product receive either more or less energy in anticipated Slice-resource deliveries and therefore are compensated by these equal and offsetting costs/credits to the Composite cost pool. See Documentation Table 2.5.6.

The Balancing Augmentation Load Adjustments to the Composite and Non-Slice cost pools are calculated as the greater of the sum of the difference in the T1SFCO between the rate proceeding and the earlier RHWM Process for each fiscal year or the avoided augmentation amount for each fiscal year. The result is multiplied by the augmentation price for the respective fiscal year.

3.1.4 Rate Design Adjustments Made Between Tier 1 and Tier 2 Cost Pools

3.1.4.1 Tier 2 Overhead Adjustment

The Tier 2 Overhead Adjustment credits the Composite cost pool for the overhead costs charged to the Tier 2 cost pools. Each of the Tier 2 cost pools includes an Overhead Cost Adder, which reflects a proportionate share of BPA's total overhead costs. See section 3.1.7.1. The Tier 2 Overhead Adjustment credited to the Composite cost pool is equal to the sum of the Overhead Cost Adders charged to all of the Tier 2 cost pools. This Tier 2 Overhead Adjustment for FY 2014-2015 can be found in Documentation Table 3.2.

3.1.5 PFp Tier 1 Billing Determinants

3.1.5.1 Tier 1 Cost Allocator

The majority of BPA's costs to be collected through PF rates are allocated among customers through the TOCA. The TOCA is the customer-specific billing determinant used to collect the costs allocated to the Composite cost pool. A TOCA is calculated for each fiscal year of the rate period for each PFp customer. Each customer's annual TOCA is calculated as a percentage by dividing the lesser of an individual customer's RHWM or its Forecast Net Requirement by the total of the RHWMs for all PFp customers. The TOCA is a percentage rounded to five decimal places, *i.e.*, seven significant digits.

The Forecast Net Requirement and RHWM for the individual customer and the sum of RHWMs for all customers are expressed in average annual megawatts and rounded to three decimal places. The total of the RHWMs for all customers can be found in Table 1, and the sum of TOCAs used for FY 2014-2015 can be found in Documentation Table 2.5.6.3.

3.1.5.2 Non-Slice TOCA

The Non-Slice TOCA is the billing determinant that is used to collect the costs allocated to the Non-Slice cost pool. A Non-Slice TOCA is calculated for each PFp customer for each year of the rate period. The Non-Slice TOCA is equal to a customer's TOCA if the customer is purchasing the Load Following or Block product. The Non-Slice TOCA for customers purchasing the Slice/Block product is computed as the difference between the customer's TOCA and its Slice Percentage. The Non-Slice TOCA percentage is rounded to five decimal places. The forecast sum of Non-Slice TOCAs used for FY 2014-2015 can be found in Documentation Table 2.5.6.3.

3.1.5.3 Slice Percentage

The Slice Percentage is the billing determinant used to collect the costs allocated to the Slice cost pool. A Slice Percentage is calculated for each year of the rate period for each PFp customer purchasing the Slice/Block product. The Slice Percentage in Exhibit J of each Slice customer's CHWM contract can be adjusted each year pursuant to section 3.6 of the TRM. and updated in Exhibit K. The Slice Percentage is rounded to five decimal places.

3.1.5.4 Load Shaping Billing Determinant

The billing determinant for the Load Shaping charge reflects the difference between a customer's actual load served at Tier 1 rates and the customer's annual load reshaped into the monthly/diurnal shape of RHWM Tier 1 System Capability (System Shaped Load). The Load Shaping billing determinant can have either a positive or a negative value.

A customer's System Shaped Load is calculated as the RHWM Tier 1 System Capability (see section 1.6) for each of the 24 monthly/diurnal periods of the fiscal year multiplied by the customer's Non-Slice TOCA. The Load Shaping billing determinants are calculated as the amount of a customer's monthly/diurnal electric load (measured in kilowatthours) to be served at Tier 1 rates less the customer's System Shaped Load for the same monthly/diurnal period.

Monthly/Diurnal RHWM Tier 1 System Capability. The TRM specifies that the monthly/diurnal shape of the RHWM Tier 1 System Capability will be used to compute the System Shaped Load for purposes of computing Load Shaping billing determinants. The System Shaped Load is not updated if the Tier 1 System output is updated in the rate proceeding. This shape is computed to be constant across both years of the rate period and is the average of each year's respective monthly/diurnal megawatthour amount. In a rate period that does not include a leap year, there will be 24 monthly/diurnal amounts for the RHWM Tier 1 System Capability specified in the GRSPs. In a rate period that includes a leap year, there will be 26 amounts, because each February has a unique value for each HLH and LLH period. See GRSP II.V.

3.1.5.5 Demand Billing Determinant

The Demand billing determinant is applicable to customers purchasing the Load Following product, the Block product, and the Block portion of the Slice/Block product. TRM sections 5.3.1 to 5.3.5 contain a detailed explanation of how to calculate the Demand billing determinant. The following is a summary of the TRM explanation.

Four quantities are used in calculating a PFp customer's Demand charge billing determinant: (1) the Tier 1 Customer's System Peak (CSP); (2) the average amount of a customer's electric load (measured in average kilowatts) that was served at Tier 1 rates during the Heavy Load Hours of a month; (3) the customer's Contract Demand Quantity (CDQ, expressed in kilowatts); and (4) any applicable Super Peak Credit as specified in a customer's CHWM contract.

The Demand billing determinant is determined by measuring a customer's CSP and then subtracting the other three quantities. The Demand billing determinant calculation can never result in a negative billing determinant. That is, if the calculation results in a value less than zero, the billing determinant is deemed to be zero.

Tier 1 CSP is equal to a customer's maximum Actual Hourly Tier 1 Load (measured in kilowatts) during the Heavy Load Hours of a month.

Twelve CDQs are specified for each PFp customer in the customer's CHWM contract.

The Super Peak Credit will be determined pursuant to a customer's CHWM contract. The Super Peak Period hours for FY 2014-2015 are defined in the GRSPs as follows (HE = Hour Ending):

October - February	HE 8 through HE 10 and HE 18 through HE 20
March - May	HE 7 through HE 12
June - September	HE 14 through HE 19

There are three possible adjustments that may be made to a customer's Demand billing determinant. The first is an adjustment to offset anomalous recovery load peaks that occur after a customer has had power restored to its service territory following a weather-related system outage or other extreme peak event. The second is an adjustment to offset extreme load changes that have severely adversely affected a customer's load factor. The third adjustment would result if the customer retains Provisional CHWM after meeting criteria stated in section 4.1.8 of the TRM. The GRSPs include the calculations for applying these adjustments, applicable qualifying criteria, and notice requirements.

3.1.6 PFp Tier 1 Rates

3.1.6.1 Tier 1 Customer Rates

Rates for the Composite, Non-Slice, and Slice customer charges are expressed as dollars per one percentage point of billing determinant (TOCA, Non-Slice TOCA, or Slice Percentage, respectively). Each of the three rates is calculated by dividing the total costs allocated to each cost pool by the sum of the respective forecast billing determinants. The quotient of that calculation is then divided by 12 to yield a monthly rate per one percent of the applicable billing determinant.

The monthly rates for each of the Tier 1 cost pools are shown in Documentation Table 2.5.6.3.

3.1.6.2 Tier 1 Load Shaping Rates

The PFp rate design includes 24 Load Shaping rates (two diurnal periods—HLH and LLH—for each of 12 months). The Load Shaping rates are set equal to the rate period average marginal cost of power for each monthly/diurnal period as determined in Power Risk and Market Price Study section 2.4. Also see Documentation Table 3.3.

3.1.6.2.1 Load Shaping True-Up

The Load Shaping True-Up is an adjustment to the Load Shaping charge that is necessary to ensure that each customer pays a Tier 1 rate for purchases of energy that are less than its RHWM. At the end of each fiscal year for each Load Following customer, BPA will calculate whether a true-up of the Load Shaping charge will be applicable. The Load Shaping Charge True-Up applies to a Load Following customer when either its TOCA Load or its Actual Annual Tier 1 Load is less than its RHWM. The Load Shaping True-Up rate is the difference between (1) the system-weighted average of the Load Shaping rates and (2) the Composite Customer rate plus the Non-Slice Customer rate, converted to mills per kilowatthour. The detailed process for calculating the Load Shaping True-Up rate is set forth in section 5.2.4.2 of the TRM, and the rate is specified in GRSP II.L.

Special Implementation Provision for Load Shaping True-Up. Special implementation provisions apply if two conditions are met: (1) a customer has Above-RHWM load; and (2) the customer has unused RHWM greater than zero. If these conditions are met, the customer may be eligible for an additional Load Shaping True-Up credit. The amount of the additional Load Shaping True-Up credit will depend on a second calculation.

This special implementation provision was originally designed to solve a transitional implementation issue caused by setting Above-RHWM load based on a different forecast than is used to determine a customer's TOCA. This provision has a longer-term application, however, because Above-RHWM load was determined in the RHWM Process (prior to the Initial Proposal), and the calculation of a customer's TOCA will occur in the Final Proposal. A consequence of using forecasts prepared at different times is the possibility that a customer has both Above-RHWM load and unused RHWM. This cannot happen if the same forecast is used to set both Above-RHWM load and customers' TOCAs.

First, if the Annual Deviation calculation of the Load Shaping Charge True-Up is negative or equals zero and the absolute value of the Annual Deviation is less than the customer's Above-RHWM load, then the additional credit is equal to the Load Shaping True-Up rate multiplied by the smallest of (1) the customer's Above-RHWM load, (2) the Above-RHWM load less the absolute value of the Annual Deviation amount, or (3) the Above Forecast amount. Second, if the Annual Deviation calculation of the Load Shaping Charge True-Up is positive and the Annual Deviation amount is less than the Above Forecast amount, then the additional credit is equal to the Load Shaping True-Up rate multiplied by the lesser of (1) the customer's Above-RHWM load or (2) the Above Forecast amount less the Annual Deviation amount.

3.1.6.3 Tier 1 Demand Rates

The Demand rates are based upon the annual fixed costs (capital and O&M) of the marginal capacity resource, an LMS-100 combustion turbine, as determined by the Northwest Power and Conservation Council's Microfin model 15.0.1. The Microfin model is used to obtain an estimate for the all-in capital costs in 2014 dollars of an LMS-100 with a 2014 in-service date. The all-in capital cost under these specifications is $1,105/kW. See Documentation Table 3.4.

The projected debt payment on the $1,105/kW fixed capital costs is estimated at $116.78/kW/yr, based on a cost of debt of 4.57 percent financed over 30 years. The plant is assumed to be owned by a publicly owned utility with BPA-backed bonds. The cost of debt is estimated with BPA's FY 2014 Third-Party Tax-Exempt 30-Year Borrowing Rate Forecast. See FY 2012 Interest Rate and Inflation Forecast memo in the Power Revenue Requirements Documentation, chapter 6.

The cost of fixed O&M included in the Demand rate calculation is obtained from the Microfin model. The calculation of the Demand rate uses the Microfin model's 2006 estimate of $8/kW/yr and is escalated to 2014 and 2015 dollars using the 2006 to 2011 average (5-year) rate of 1.88 percent calculated from the Implicit Price Deflators from the U.S. Bureau of Economic Analysis. The two-year average annual cost for fixed O&M is $9.38/kW/yr.

Insurance and fixed fuel are also included in the calculation of the Demand rate. The average annual insurance cost of $2.67/kW/yr is calculated based on 0.25 percent of the mid-year assessed value obtained from the Council's Microfin model. The fixed fuel cost assumed in the Demand rate calculation is $36.34/kW/yr. The fixed fuel cost is estimated using Microfin's vintaged heat rate of 8,650 Btu/kWh and applied to the average of the existing and new Pacific Northwest East (PNWE) fixed fuel costs for the applicable fiscal year. An offsetting revenue credit was applied equal to 10 percent for the resale of firm pipeline rights.

The average annual expense is $116.78/kW. This annual value is shaped into the 12 months of the year using the shape of the Load Shaping rates, resulting in Demand rates specific to each month. See Documentation Table 3.4 and the Power Rate Schedules, BP-14-E-BPA-09; *e.g.*, Schedule PF-14, section 2.1.2.1.

3.1.6.4 PFp Tier 1 Equivalent Rates

The PFp Tier 1 Equivalent rates consist of 12 HLH Energy rates, 12 LLH Energy rates, and 12 Demand rates. The PFp Tier 1 Equivalent Energy rates are equal to the Load Shaping rates less a single $/MWh value. The single $/MWh value scales the Load Shaping rates to a level at which the PFp Tier 1 Equivalent Energy rates, in conjunction with the demand revenue, would collect the Tier 1 revenue requirement allocated to the PFp Non-Slice loads (the Composite cost pool plus the Non-Slice cost pool). This single $/MWh value is equivalent to the Load Shaping True-Up rate. This calculation can be found in Documentation Table 2.5.8.5. The Demand rates are equal to the Tier 1 Demand rates.

3.1.7 PFp Tier 2 Cost Pool

There are three Tier 2 rates—the Short-Term rate, the Load Growth rate, and the VR1-2014 rate. Costs allocated to the aggregate Tier 2 cost pool are further allocated to the Short-Term, Load Growth, and VR1-2014 cost pools. For the rate period, those costs are the actual costs associated with the flat-block energy purchases at the transacted amounts and prices, when applicable. When actual power purchase costs are not available, forecast costs associated with anticipated transactions will be used for forecasting rates. A formula rate will be used to accomplish this. Costs for Tier 2 Overhead Adjustment and scheduling services are added to these cost pools and are described in the following sections.

3.1.7.1 Tier 2 Overhead Cost Adder

Section 6.3.3 of the TRM describes an Overhead Cost Adder to be included as part of the Tier 2 rates. The overhead cost components used to calculate the Tier 2 Rate Overhead Cost Adder are listed in Documentation Table 3.2. The rate period total of these overhead costs is divided by BPA's total forecast of revenue-producing energy sales (PFp, IP, NR, FPS, Downstream Benefits and Pumping Power, Pre-Subscription, Generation Inputs for Ancillary and Other Services Revenue, and Secondary sales), which results in a $1.22/MWh adder for the rate period. The $/MWh value in each year is multiplied by the amount of planned sales in each year for each Tier 2 alternative (Short-Term, Load Growth, and VR1-2014) to produce a dollar value for the Overhead Cost Adder included in each cost pool for each year. The Tier 2 Overhead Cost Adder provides the revenue credit to the Composite cost pool (called Tier 2 Overhead Adjustment); see section 3.1.4.1 above. The specific cost and sales values used in these calculations can be found in Documentation Table 3.5.

3.1.7.2 Tier 2 Transmission Scheduling Service Cost Adder

A cost for Transmission Scheduling Service (TSS) is added to each Tier 2 cost pool. A TSS Adder is calculated by dividing the operations scheduling costs for the rate period by the total megawatthours actually scheduled in FY 2011 and FY 2012 to produce a yearly $/MWh value. This calculation is summarized in Documentation Table 3.6. Inputs to this calculation are included in Documentation Table 3.7. This value is multiplied by the amount of planned Tier 2 sales in each year for each Tier 2 alternative (Short-Term, Load Growth, and VR1-2014) to produce the annual cost value for the TSS Cost Adder included in each cost pool for each year. The Tier 2 TSS Cost Adder is one of the credits to the Composite cost pool summed in the Resource Support Services Revenue Credit; see section 3.1.2.1 above. The calculated costs assigned to each cost pool in each year can be found in Documentation Tables 3.8, 3.9, and 3.10.

3.1.7.3 Tier 2 BPA Market Purchases

As of the date of the Initial Proposal, BPA has made one purchase for Tier 2 rate service for the FY 2014-2015 rate period. BPA intends to make additional purchases prior to the time power deliveries begin for FY 2014 and FY 2015. However, until those purchases are completed, the Initial Proposal assumes the augmentation price as the proxy price for these power purchases. The rates will be updated formulaically prior to power deliveries to reflect the actual power purchase costs. When the purchase costs are updated for FY 2014 and FY 2015 they will be allocated on a pro rata load basis between the Tier 2 cost pools. To the extent BPA has a remaining fractional amount of need after the purchases are completed, that will continue to be priced at the augmentation price.

In 2012, BPA purchased 51 aMW to meet forecast FY 2015 Tier 2 need. The power costs associated with 5 aMW of this purchase were allocated to the Load Growth rate at the time of the purchase. The power costs associated with the remaining 46 aMW were allocated to the VR1-2014 rate. The power amount for VR1-2014 is roughly equal to the Tier 2 load obligation for each year of service associated with this rate plus the real power losses required to deliver the power to the purchasers. The average megawatt purchase amounts for each rate pool and their associated power purchase prices are summarized in Documentation Table 3.11.

3.1.7.3.1 Reallocated Power from the Load Growth Rate Cost Pool

The 5 aMW of power that BPA purchased to meet anticipated need in the Load Growth rate pool is now known to be in excess of the Tier 2 load obligation for FY 2015, as determined in accordance with the RHWM Process, including the real power losses to deliver the power to the purchasers. Pursuant to section 3.4 of the TRM, the power in excess of the cost pool's load is reallocated to another Tier 2 cost pool(s), namely the Short-Term and VR1-2014 cost pools. This allocation was done on a pro-rata basis based on the outstanding need across the pools.

For ratemaking purposes, this reallocation of power is forecast to occur at the augmentation price for FY 2015. When a power purchase is made for the remaining need in FY 2015, the formula rates will be computed based on both the actual price of the purchase for that remaining need and the price of the reallocated power from the Load Growth customer pool. The revenues from such reallocation are credited to the Load Growth cost pool. The cost differential between the power purchase cost and the price associated with the reallocated power is removed from the Load Growth rate and charged (or credited) to a set of Load Growth rate customers through a Load Growth Rate Customer Billing Adjustment, described in more detail in section 3.1.12.

3.1.7.3.2 Reallocated Power from CHWM Contract Section 10 Remarketing

The power purchased in FY 2012 that was assigned to the VR1-2014 rate pool exceeds above-RHWM loads for some purchasers. Pursuant to section 6.4 of the TRM and section 10.4 of the CHWM contract, the Tier 2 rate purchase amount in excess of the customer's need is remarketed and the proceeds credited to that customer.

Similarly, there are customers with specified resources to which DFS applies that are in excess of a customer's Above-RHWM load. Pursuant to section 10.5 of the CHWM contract, BPA must remarket the amounts of non-Federal resource with DFS in the same manner as it remarkets Tier 2 rate purchase amounts.

In the BP-14 Initial Proposal, the power associated with both remarketing actions is forecast to be reallocated to the Tier 2 Short-Term cost pool. For ratemaking purposes, this reallocation of power is forecast to occur at the augmentation price for FY 2015. When a power purchase is made for the remaining Tier 2 Short-Term need, the formula rates will be computed based on both the price of the purchase for that remaining need and the price of the reallocated power from the remarketed VR1-2014 and non-Federal resource with DFS amounts. The revenues from such reallocation are credited to the individual customers, as required under the CHWM contract, described in more detail in sections 3.1.11 and 3.1.15.4.4. Documentation Table 3.12 summarizes the source of power for meeting the different Tier 2 loads. It includes purchases both executed and forecast, remarketed power from other Tier 2 cost pools, and remarketed power from non-Federal resources with DFS.

3.1.7.4 Tier 2 Risk Analysis

The risk analysis for Tier 2 rate service is addressed in Power Risk and Market Price Study section 4.3. Consistent with that discussion, no risk mitigation treatment is added to the Tier 2 cost pools to cover risks in the FY 2014-2015 rate period.

3.1.8 PFp Tier 2 Billing Determinants

The Tier 2 billing determinant is equal to each customer's commitment to purchase from BPA all or a portion of the customer's Above-RHWM load. Each customer's Tier 2 rate service amount is contractually established for FY 2014-2015, and the totals for all the customers by Tier 2 alternative are summarized in Documentation Table 3.13. Because there are no purchases of VR1-2014 service in FY 2014 (as service begins in FY 2015), no costs are allocated to the VR1-2014 cost pool for FY 2014.

3.1.9 Tier 2 Rates

Based on the annual average megawatt load obligations for each Tier 2 rate alternative (Short-Term, Load Growth, and VR1-2014) in each year and the costs for each cost pool in each year, Tier 2 rates are calculated as summarized in Documentation Tables 3.8, 3.9, and 3.10. Each rate is calculated by dividing the annual costs allocated to the specific Tier 2 cost pool by the billing determinants in that same fiscal year. A specific Tier 2 rate in each year for each Tier 2 rate alternative is necessary because there are different sets of customers associated with each rate, different costs from the separate purchases, different allocations to Tier 2 cost pools, and different surplus/deficit calculations.

3.1.9.1 Tier 2 Rate Transmission Curtailment Management Service (TCMS) Adjustment

The Tier 2 rate schedule includes an adjustment for TCMS-related costs. This adjustment will occur if a transmission event (in the form of either a planned transmission outage or a transmission curtailment) has occurred along the transmission path between Mid-C and the BPA Power Services point of delivery for the market purchases allocated to the Tier 2 cost pools. The adjustment is described in GRSP II.X.

3.1.10 Calculating Charges to Reduce Tier 2 Purchase Amounts

3.1.10.1 Tier 2 Purchase Amount Reductions for Vintage Rate Service

Section 2.3.1.1 of Exhibit C of the Load Following CHWM contract provides customers with an opportunity to reduce their purchase amounts supplied by BPA at the Tier 2 Short-Term rate and replace them with service from BPA at a Tier 2 Vintage rate if one is offered. For customers making this election, BPA will levy charges to cover costs that BPA is obligated to pay and is not able recover through other transactions. Section 2.3.1.4 of the CHWM contract states that BPA shall determine the costs, if any, to be collected from such charges during the 7(i) process that establishes the applicable Tier 2 Vintage rate. Thirteen customers elected to take service at the VR1-2014 rate, totaling 46 aMW in the FY 2015-2019 period. A portion of these customers did so by electing to reduce their future

Short-Term rate purchase amounts. The customer elections were provided prior to the time BPA made any purchases to meet its Short-Term rate load obligations. As a result, there are no costs that need to be recovered through such charges.

3.1.10.2 Tier 2 Purchase Amount Reductions for Service with Non-Federal Resources

Section 2.4.2 of Exhibit C of the Load Following CHWM contract provides customers with an opportunity to reduce the purchase amounts supplied by BPA at the Tier 2 Short-Term rate and replace them with Unspecified Resource Amounts, if notice is provided by October 31 of a rate case year, which was October 31, 2012, for the BP-14 rate period. If a customer makes this election, BPA may levy charges to cover costs that BPA is obligated to pay and is not able recover through other transactions. Section 2.4.2.1 of the contract states that BPA shall determine the costs, if any, to be collected from such charges during the 7(i) process following a customer's notice to reduce its Tier 2 rate purchase amount. The customers that elected to reduce their Short-Term rate purchase amounts did so for (1) the FY 2014-2015 period, (2) FY 2014 only, or (3) FY 2015 only. The notices were provided prior to BPA making any purchases to meet its Short-Term rate load obligations, so BPA has not incurred any costs due to these purchase reductions; therefore, there are no costs that need to be recovered through such charges.

3.1.11 Tier 2 Remarketing for Individual Customers

3.1.11.1 Tier 2 Remarketing for Load Following Customers

Section 10 of the CHWM contract states that the customer may elect to have BPA remarket its Tier 2 rate purchase amount in the event its Above-RHWM load as forecast for an upcoming rate period year is less than the sum of its Tier 2 rate purchase amounts and new non-Federal resource amounts. Notice of such election must be provided by October 31 of a rate case year for Load Following customers. In the BP-14 rate period this provision is applicable to five Load Following customers for VR1-2014 amounts they subscribed to in 2011 that are now in excess of their FY 2015 Above-RHWM loads.

3.1.11.2 Tier 2 Remarketing for Slice/Block Customers

Section 10 of the CHWM contract states that the customer may elect to have BPA remarket its Tier 2 rate purchase amount in the event its Forecast Net Requirement for the first fiscal year of an upcoming rate period is less than the sum of its RHWM and Tier 2 rate purchase amounts. Notice of such election must be provided by August 31 of the applicable fiscal year. In the BP-14 rate period this provision could be applicable in FY 2014 to one Slice/Block customer for the Short-Term rate amount it subscribed to in 2009.

3.1.11.3 Calculating the Remarketed Tier 2 Proceeds for Load Following and Slice/Block Customers

Section 6.4 of the TRM states that if BPA remarkets a customer's Tier 2 purchase obligation pursuant to the CHWM contract, BPA will credit the proceeds from the remarketing (net of any remarketing costs) to such customer. The customer must continue to pay for the entire purchase at the appropriate Tier 2 rate. The remarketed Tier 2 proceeds are forecast for Load Following customers using (1) the remarketed amount of Tier 2 service (in megawatthour) plus real power losses and (2) the augmentation price for the applicable fiscal year. The augmentation price will be replaced with the actual price BPA pays for the power it purchases to meet its remaining Tier 2 need in FY 2015. After notice is provided by the Slice/Block customer, the remarketed Tier 2 proceeds will be computed for that customer using (1) the remarketed amount of Tier 2 service (in megawatthours) plus real power losses and (2) the flat annual equivalent market price forecast for the applicable fiscal year plus any additional costs incurred by BPA in purchasing power from other entities. The annual remarketing proceeds for each customer will be divided by 12 to compute a flat monthly credit that shall be applied to the customer's bill. Each applicable Load Following customer's forecast monthly remarketed Tier 2 proceeds amount is summarized in Documentation Table 3.14.

3.1.12 Load Growth Rate Customer Billing Adjustment

BPA will apply an adjustment to the bills of Load Growth customers with an Above-RHWM load amount greater than zero and less than 8,760 MWh, as calculated in the RHWM Process. As described in section 3.1.7.3, BPA purchased power in excess of FY 2015 Load Growth rate customer need. This excess power will be allocated to the other Tier 2 cost pools at the price BPA pays for purchases made to meet the remaining Tier 2 load obligation plus losses. Until those purchases are made, the price will be forecast at the augmentation price. The cost differential between the price paid for the power and the remarketing price, whether positive or negative, will be allocated to the Load Growth customers using their Above-RHWM load amount (if it was computed in the RHWM Process to be greater than zero and less than 8,760 MWh) as the basis of the cost allocator. A billing cost cap will limit the amount charged to a customer to no more than the second-highest proportion of the applicable customers' forecast Tier 1 bills devoted to this Load Growth rate customer adjustment. The cost differential is forecast to be $123,763 using the augmentation price as proxy for the power purchase cost associated with the ultimate purchases BPA will make for the remaining Tier 2 load obligation plus losses. Each applicable Load Growth customer's forecast billing adjustment is summarized in Documentation Table 3.15.

3.1.13 PFp Irrigation Rate Discount

The Irrigation Rate Discount is a discount to the PFp Tier 1 rates for eligible irrigation load served by a customer. The discount will appear as a credit on customer bills as an offset to the charge of eligible irrigation load at Tier 1 rates. This discount is available to eligible loads during May, June, July, August, and September during the BP-14 rate period. See GRSP II.K.

3.1.13.1 Irrigation Rate Discount Rate

The TRM establishes the method for calculating the IRD rate. The process begins with a fixed Irrigation Rate Mitigation Program (IRMP) percentage equal to 37.06 percent. See TRM, BP-12-A-03, section 10.3, and BP-12 PRS Documentation, BP-12-FS-BPA-01A, Tables 3.12 and 3.13.

The IRMP percentage is multiplied by the sum of the forecast revenue that irrigation loads will pay through the composite Customer Charge, the Non-Slice Customer Charge, and the Load Shaping Charge, adjusted for any applicable Low Density Discount, divided by the sum of the irrigation loads (expressed in megawatthours), to derive a dollars per megawatthour discount. The applicable Low Density Discount is calculated as the weighted average eligible Low Density Discount of irrigation customers weighted with eligible irrigation loads. See Documentation Table 3.16.

Forecast revenue for irrigation loads will be calculated using an IRD TOCA derived by dividing the sum of the irrigation loads (expressed in average megawatts) by the sum of all RHWMs. This IRD TOCA will be applied consistent with TRM section 5 for calculation of forecast irrigation revenues from the Composite Customer Charge, the Non-Slice Customer Charge, and the Load Shaping Charge. This discount will be seasonally available to qualifying loads during May, June, July, August, and September. See TRM, BP-12-A-03, at 93. The calculation is shown on Documentation Table 2.3.3.

3.1.13.2 Irrigation Rate Discount Bill Credit

The irrigation credit available to a customer with eligible irrigation load is equal to the monthly irrigation load set forth in Exhibit D of the customer's CHWM contract multiplied by the IRD rate. The amount of irrigation credit the customer would receive is limited to the lesser of a customer's Tier 1 energy purchase or its eligible irrigation load amounts in the customer's CHWM contract.

3.1.13.3 Irrigation Rate Discount True-Up

At the end of each irrigation season, customers with eligible irrigation load will send to BPA their measured May through September irrigation load amounts. If BPA determines that the measured irrigation load amounts are less than the eligible irrigation load amounts set forth in Exhibit D of the customer's CHWM contract, then the purchaser shall reimburse to BPA excess IRD credits. Excess IRD credits will be calculated as the IRD rate multiplied by the difference between the contract irrigation load and the measured irrigation load. See GRSP II K.3.

3.1.14 PFp Melded Rates (Non-Tiered Rate)

Melded PF Public rates are included in the PF rate schedule. The PFp Melded rates consist of 12 HLH Energy rates, 12 LLH Energy rates, and 12 Demand rates. The PFp Melded Energy rates are equal to the PFp Load Shaping rates less a single $/MWh value. The single $/MWh value adjusts the Load Shaping Rates so that the PFp Melded Energy rates, in conjunction with the demand revenue, do not collect more or less revenues than the Tier 1 and Tier 2 revenue requirement allocated to the PFp loads. This $/MWh value is the PFp Melded Equivalent Energy Scalar, which is also used in the Slice True-Up to determine the actual DSI revenue credit. This calculation is shown in Documentation Table 2.5.8.2. The applicable Demand rates are equal to the PFp Tier 1 Demand rates.

The PFp Melded Energy rates are also used to shape and set the level of the IP Energy rates, as described in section 3.3.1.

3.1.15 PFp Resource Support Services

BPA offered customers access to RSS and related services for their variable, non-dispatchable non-Federal resources, in accordance with the CHWM contract. The related services include Transmission Scheduling Service and Transmission Curtailment Management Service. In general, these services are designed to financially convert a variable, non-dispatchable resource into a flat annual block of power or the specified monthly/diurnal resource shape found in Exhibit A of the customer's CHWM contract. Resource Remarketing Service (RRS) is an additional related service that may be provided during the BP-14 rate period.

RSS is also applied to Federal resource acquisitions to make them financially equivalent to a flat block, if necessary. See TRM section 8. The cost of Klondike III, a wind plant, is assigned to Tier 1 Augmentation in the Composite cost pool. Tier 1 Augmentation is assumed to be in the shape of an annual flat block purchase for ratemaking purposes. See TRM section 3.5. Because Klondike III's generation is variable and non-dispatchable in nature, certain RSS rate design components apply to Klondike III, and the resulting costs are allocated to the Composite cost pool. These costs are described below.

For the BP-14 Initial Proposal, costs for RSS are not allocated to the Tier 2 cost pools because there are no variable, non-dispatchable resources assigned to the Tier 2 cost pools. Costs for TSS are allocated to the Tier 2 cost pools, as described in section 3.1.7.2. Costs for TCMS events associated with Tier 2 rate service are recovered through the Tier 2 Rate TCMS Adjustment, described in section 3.1.9.1.

3.1.15.1 RSS Rates

RSS rates are included in the PF and FPS rate schedules. The rates described here under the PFp section include Diurnal Flattening Service energy and capacity rates, Resource Shaping rates and adjustment, Secondary Crediting Service shortfall and secondary energy rates, and Secondary Crediting Service Administrative Fee rate. The rates described under the FPS section include Forced Outage Reserve Service energy and capacity rates, TSS rate, TCMS rate, and RRS. In total, about $3 million of forecast RSS and TSS-related revenue credits are applied annually to the Tier 1 cost pools. See Documentation Tables 3.1 and 3.5.

3.1.15.2 RSS Diurnal Flattening Service, Resource Shaping Charge, and Resource Shaping Charge Adjustment

3.1.15.2.1 Diurnal Flattening Service (DFS)

DFS is an optional service that financially converts the output of a variable, non-dispatchable resource into one that is equivalent to a flat amount of power within each diurnal period of a month. When DFS charges are coupled with the Resource Shaping Charges, the variable generating resource is financially converted to one that is equivalent to a flat annual block of power. BPA selected a flat annual block of power as the benchmark shape to which to compare new non-Federal resources and Tier 2 purchases. DFS will apply to the non-Federal resource the customer is applying to its load and any portion of the resource remarketed by BPA.

The RSS module of RAM calculates a unique set of rates and charges for each resource to which DFS is applied. Included in the Documentation are the final rates and charges calculated for the customers that have requested DFS for their resources. See Documentation Table 3.17. PF-14 rate schedule sections 5.1 and 5.2 describe the general rate application of the DFS-related charges. The GRSPs include the calculations for the DFS capacity charges, DFS energy charges, and Resource Shaping charges for the resources to which DFS is applied. See GRSP II.U.

Briefly, DFS charges include the following elements:

- A DFS capacity charge based on the PFp Tier 1 Demand rate applied to the difference between the calculated firm capacity of the resource and the planned average HLH generation of the resource. This charge reflects the costs of reserving an amount of capacity to smooth out the variable generation of a resource into a flat block of power.
- A DFS energy charge based on the potential cost of storing and releasing power using a resource capable of storing energy (pumped storage) to balance the hourly shape of the

resource to which DFS is applied. This charge reflects the costs of energy storage to smooth the hourly generation variation into a flat monthly/diurnal block of power.

When DFS is applied to a resource, other charges must be added to the DFS charges to complete the financial conversion to a flat annual block of power. These include the following elements:

- The Resource Shaping charge, based on the Resource Shaping rates (which are equal to the PFp Tier 1 Load Shaping rates) to financially convert the resource amounts that have been flattened on a monthly/diurnal basis into a flat annual block of power.
- A Resource Shaping Charge Adjustment, based on the Resource Shaping rates, to correct for generation forecast error.

3.1.15.2.2 DFS Capacity Charge

Unless stated otherwise, the resource amounts used in these calculations are either (1) generation amounts specified in the customer's CHWM contract Exhibit A (Exhibit A amounts) or (2) planned generation amounts based on hourly generation from the most recent historical year specified in the customer's CHWM contract Exhibit D (Exhibit D amounts).

DFS Capacity Rate. The rates used to calculate the DFS Capacity Charge are the monthly PFp Tier 1 Demand rates.

DFS Capacity Billing Determinant. The billing determinant is the difference between the resource's monthly average HLH Exhibit D amounts in one year and the calculated monthly firm capacity of the resource.

Monthly Firm Capacity. The RSS module of RAM calculates monthly firm capacity amounts for each resource. This calculation represents the lowest level of historical generation in a HLH period for each month after accounting for planned and forced outages. The firm capacity of a resource is calculated as the percentile equal to the forced outage rating calculated from the historical monthly HLH generation levels. In other words, a resource with a 5 percent forced outage rating would have a firm capacity amount equal to the 5th percentile of the hourly historical generation amounts for the HLH period of a month.

The billing determinant also includes a planned outage adjustment. If the historical hourly data reflects an outage that was planned, the model does a second calculation of the monthly firm capacity amount. This test runs the same calculation as above but calculates the value approximately equal to the forced outage percentile of an hourly sample that does not include the hours that were identified as a planned outage. If the number of planned outage hours is less than 25 percent of the HLH in the month, no further adjustments are made to the value calculated by the planned outage calculation of firm capacity. If the number of planned outage hours is equal to 25 percent of the HLH in the month but less than 75 percent of the hours in the month, the planned outage adjusted firm capacity value is reduced by multiplying it by one minus the percentage of planned hours in the month. If the number of planned outage hours in the month is equal to or greater than 75 percent of the HLH in the month, the firm capacity of the resource in that particular month is set to zero.

DFS Capacity Charge. For each resource, the DFS Capacity charge is the lesser of:

(1) the sum of (i) the monthly DFS Capacity rates multiplied by (ii) the monthly DFS billing determinants

or

(2) the annual average Exhibit D amount multiplied by the sum of the monthly PF Tier 1 Demand rates

The result is then divided by 12 to calculate a flat monthly charge that will be specified in Exhibit D of the customer's CHWM contract. Documentation Table 3.17 shows the individual DFS capacity charges that are calculated for the individual resources to which DFS is applied.

3.1.15.2.3 DFS Energy Charge

DFS Energy Rate. A unique DFS energy rate is developed for each resource to which DFS is applied. The purpose of this rate is to reflect the potential cost of storing and releasing energy to offset the hourly variability of the resource's Exhibit D amounts. The RSS module of RAM calculates the DFS energy rate for each resource. Generally, for each monthly/diurnal period in a year, the sum of planned generation in excess of average monthly/diurnal Exhibit D amounts is multiplied by 25 percent (to reflect the energy lost when using a pumped storage hydroelectric unit to perform the energy storage). The result is multiplied by the applicable monthly/diurnal Resource Shaping rate. The monthly/diurnal results are summed for the year and divided by the total planned energy from the Exhibit D amounts to calculate the DFS Energy rate.

DFS Energy Billing Determinant. The DFS energy billing determinant is the total actual generation for the particular resource during the billing month. The actual generation amounts will be either the resource meter readings or the resource transmission schedules if the resource requires an e-Tag. For wind resources within the BPA balancing authority area, transmission curtailments associated with Dispatcher Standing Order (DSO) 216 will be treated as lowered scheduled amounts when calculating the actual generation for such a resource.

DFS Energy Charge. The DFS energy charge is the product of multiplying the DFS energy rate by the DFS energy billing determinant for each month. Documentation Table 3.17 shows the DFS energy rates that are calculated for the individual resources to which DFS is applied. GRSP II.U.1.(a) includes the formula for calculating the DFS energy charges for the individual resources to which DFS is applied.

3.1.15.2.4 Resource Shaping Charge

Resource Shaping Rate. The monthly/diurnal Resource Shaping rates are equal to the PFp Tier 1 Load Shaping rates. The purpose of this rate is to reflect the value of buying and selling flat monthly/diurnal blocks of power in the market (with the Load Shaping rate as the proxy market price) to convert a diurnally flat resource within the month into one that, on a planned basis, is flat across the year.

Resource Shaping Billing Determinant. The Resource Shaping billing determinant for each resource is the difference between the planned monthly/diurnal generation from the Exhibit D amounts and the annual average generation from the Exhibit A amounts for the same year.

Resource Shaping Charge. For each resource, the Resource Shaping charge is the product of multiplying the Resource Shaping rate by the Resource Shaping billing determinant. The sum of the values is divided by 24 (or 12 if the service applies only in one fiscal year) to calculate a flat monthly charge. On a monthly basis this calculation can result in a charge or a credit.

The flat monthly Resource Shaping charge that results from this calculation will be reflected on the customer's monthly bill. Documentation Table 3.17 shows the Resource Shaping charges that are calculated for the individual resources to which DFS is applied. GRSP II.U.1.(c) includes the formula for calculating the Resource Shaping charges for the individual resources to which DFS is applied.

For Small, Non-Dispatchable Resources (as defined in the CHWM contract), the Resource Shaping charge will not apply. The actual generation amounts will be used in the calculation of the Actual Monthly/Diurnal Tier 1 Load when calculating the PFp Tier 1 Load Shaping charge and Demand charge billing determinants.

3.1.15.2.5 Resource Shaping Charge Adjustment

Resource Shaping Charge Adjustment Rate. The rates used to calculate the Resource Shaping Charge Adjustment are the monthly/diurnal Resource Shaping rates.

Resource Shaping Charge Adjustment Billing Determinant. For each resource, the billing determinant is the difference between the planned monthly/diurnal generation from CHWM contract Exhibit D amounts and the actual monthly/diurnal generation of the resource. The actual generation amounts will be either the resource meter readings or resource transmission schedules if the resource requires an e-Tag. The calculation of the Resource Shaping Charge Adjustment billing determinant will also include energy provided through Forced Outage Reserve Service (FORS), TCMS, planned outage replacement, economic dispatch, and Unauthorized Increases in the determination of actual generation. For wind resources within the BPA balancing authority area, transmission curtailments associated with DSO 216 will be treated as lowered scheduled amounts when calculating the actual generation for such a resource.

Resource Shaping Charge Adjustment. For each resource, the Resource Shaping Charge Adjustment is the product of multiplying the Resource Shaping rate by the Resource Shaping Charge Adjustment billing determinant for each monthly/diurnal period. The purpose of this charge is to capture the cost or value of the energy differences between the Exhibit D amounts and the actual generation of the resource. This adjustment completes the financial conversion to a flat annual block of power by making up for any energy cost differences between planned and actual generation amounts. On a monthly/diurnal basis this calculation can result in either a charge or a credit. GRSP II.U.1.(d) includes the formula for calculating the Resource Shaping Charge Adjustment for the individual resources to which DFS is applied.

3.1.15.2.6 DFS and Resource Shaping Charge Application to Tier 1 Augmentation

The TRM states that RSS pricing will be used to make certain Federal resource acquisitions financially equivalent to a flat block. TRM section 8. In addition, Tier 1 Augmentation is assumed to be in the shape of an annual flat block purchase for ratemaking purposes. TRM section 3.5. The costs of Klondike III, a wind resource, are allocated to Tier 1 Augmentation. The RSS module of RAM calculates a DFS capacity charge, DFS energy charge, and Resource Shaping charge for Klondike III. The billing determinant for the DFS energy charge is the planned generation amount based on the historical generation year data, in lieu of actual generation data. In addition, the RSS module calculates a TSS charge for Klondike III. The sum of the charges for Klondike III for each year is allocated to the Tier 1 Composite cost pool under the "Augmentation RSS and RSC Adder" line item. There is no Resource Shaping Charge Adjustment applied to Klondike III. Documentation Table 3.17 shows the summary DFS, Resource Shaping, and TSS charges that are calculated for Klondike III.

3.1.15.3 RSS Secondary Crediting Service (SCS)

SCS provides a credit to a Load Following customer that dedicates to its load the entire output of a hydroelectric Existing Resource for the energy produced by that resource that is in excess of the monthly/diurnal amounts specified in the CHWM contract Exhibit A or a charge for any energy shortfall by the resource from the monthly/diurnal Exhibit A amounts. If a customer does not take this service, it must apply the exact Exhibit A amounts to its load, unless the resource is a small, non-dispatchable resource.

Credits are provided to the customer when its resource generates more than the contract amount. This additional generation would increase BPA's revenues because of the increased secondary energy BPA can market or would lower BPA's costs because of reduced balancing purchases. Likewise, when generation is less than the contract amounts, the customer is charged, because BPA's secondary revenues would be lower or BPA's balancing costs would be higher. The unanticipated credit or cost

BPA would experience is passed through to the customer by the SCS using the posted Resource Shaping rate as the market rate. The PF-14 rate schedule includes a section on the rate application of the SCS-related charges. GRSP II.U.2 includes the formulas for calculating the SCS charges for the resources to which SCS is applied. Documentation Table 3.17 includes the individual SCS Administrative Charges for the individual non-Federal resources to which SCS is applied.

3.1.15.3.1 SCS Pricing Summary

The charges and credits for SCS are intended to reflect the cost or value of reshaping the customer's resource into its Exhibit A amounts.

The SCS charges include the following elements:

- A Secondary Energy credit or Shortfall Energy charge, priced at the Resource Shaping rate.
- An Administrative Charge similar to a reservation fee, based on the forced outage rating of the hydro resource, the PFp Tier 1 Demand rate, and the monthly HLH Exhibit A amounts.

3.1.15.3.2 SCS Shortfall Energy Charges and Secondary Energy Credits

SCS Energy Rate. The rates used to calculate the SCS Shortfall Charge and the Secondary Energy Credit are the monthly/diurnal Resource Shaping rates.

SCS Billing Determinant. For each resource, the billing determinant is the difference between the actual monthly/diurnal generation and the monthly/diurnal generation from Exhibit A amounts. The actual generation amounts will be either the resource meter readings or resource transmission schedules if the resource requires an e-Tag. For SCS Option 1 only (the power exchange between the customer and BPA), the actual generation amounts shall be net of transmission losses on the BPA transmission system. See GRSP III.A.15. The actual generation shall include energy amounts provided through TCMS.

SCS Shortfall Energy Charge/Secondary Energy Credit. For each resource, the charge or credit is the product of multiplying the SCS energy rate by the SCS energy billing determinant for each monthly/diurnal period. If the actual generation exceeds the Exhibit A amount, the customer will receive a credit. If the actual generation is less than the Exhibit A amount, the customer will receive a charge. GRSP II.U.2.(a) includes the formula for calculating the SCS Shortfall Energy Charges/Secondary Energy Credits for the individual resources to which SCS is applied.

3.1.15.3.3 SCS Administrative Charge

A customer's SCS Administrative Charge will be calculated in the form of a capacity reservation fee. This capacity reservation fee's structure mirrors the structure of the FORS capacity charge, described in section 3.5.1.

SCS Administrative Rate. The rates used to calculate the SCS Administrative Charge are the monthly PFp Tier 1 Demand rates.

SCS Administrative Charge Billing Determinant. For each resource, the billing determinant is the monthly HLH Exhibit A amount multiplied by the forced outage rating.

SCS Administrative Charge. For each resource, the SCS Administrative charge is the product of multiplying the SCS Administrative rate by the SCS Administrative billing determinant for each month. The sum of the values is divided by 12 to calculate a flat monthly charge. The flat monthly SCS Administrative charge that results will be specified in section 2.5.3.2 of Exhibit D of the CHWM contract. Documentation Table 3.17 shows the SCS Administrative charges that are calculated for the individual resources to which SCS is applied. GRSP II.U.2.(b) includes the formula for calculating the SCS Administrative Charge for the individual resources to which SCS is applied.

3.1.15.4 Additional PFp RSS Considerations

3.1.15.4.1 Forced Outage Rating

All generally recognized types of generating resources have a standard forced outage rating. This rating represents the average percentage of time that a generating resource is unavailable for load service due to unanticipated breakdown. BPA uses a minimum five percent forced outage rating for hydroelectric resources, seven percent for thermal resources, and ten percent for all other resources. Customers taking services that have charges including the use of a forced outage rating may request that BPA increase the forced outage rating for their resource, and those with a resource other than a hydroelectric resource may request that BPA decrease the forced outage rating to as low as seven percent.

3.1.15.4.2 Historical Generation Year Resource Amounts Adjusted for Schedules

Typically, the RSS module of RAM will use scheduled amounts for resources that require an e-Tag and meter amounts for “behind-the-meter resources.” However, for small resources or small shares of a resource, BPA may apply a meter amount instead of a schedule amount for purposes of pricing RSS if the meter amounts produce lower RSS rates and charges. This adjustment applies to both RSS provided under the PF rate schedule, discussed above, and the FPS rate schedule, described below.

3.1.15.4.3 Credits to the PFp Tier 1 Customer Cost Pools

Forecast revenue credits will be calculated from the RSS charges. All revenues except those from the Resource Shaping Charge will be credited to the appropriate PFp Tier 1 Customer Rate cost pools. The forecast revenue from the Resource Shaping Charge sales is a revenue credit to the Non-Slice cost pool. Additional information on these revenue credits is found in sections 3.1.2.1 and 3.1.2.2.

3.1.15.4.4 Non-Federal Resource with DFS Remarketing

Section 10 of the CHWM contract states that the customer may elect to remove a new non-Federal resource in the event its Above-RHWM load, as forecast for an upcoming rate period year, is less than the sum of its Tier 2 rate purchase amounts and New Resource amounts. Notice of such election must be provided by October 31 of a rate case year for Load Following customers. Section 10.5 of the CHWM contract states that BPA shall remarket the amounts of removed resources for which the customer purchases DFS in the same manner BPA remarkets Tier 2 rate purchase amounts. The customer will continue to pay for DFS on the entire resource amount that is applied to load and any portion of the resource remarketed by BPA. In the BP-14 rate period this provision is applicable to three Load Following customers for non-Federal resource amounts they previously dedicated to load and that are now in excess of their FY 2014 or FY 2015 Above-RHWM loads.

DFS Remarketing Rate. The DFS remarketing proceeds are forecast for Load Following customers using the augmentation price for the applicable fiscal year. To the extent applicable, the augmentation price will be replaced with the actual price BPA pays for the power it purchases to meet its remaining Tier 2 load obligation plus losses in the applicable fiscal year.

DFS Remarketing Billing Determinant. For each applicable non-Federal resource to which DFS applies, the billing determinant is (i) the Customer's total non-Federal resource, less (ii) the amount of the Customer's non-Federal resource needed to meet Above-RHWM load, as reflected in the customer's CHWM contract Exhibit A, when updated.

DFS Remarketing Credit. For each resource, the DFS remarketing credit will be the product of multiplying the DFS remarketing rate by the DFS remarketing billing determinant for each applicable year of the rate period. The annual value is divided by 12 to calculate a flat monthly credit. Documentation Table 3.18 shows the forecast monthly DFS Remarketing Credits that are calculated for the individual resources to which the DFS remarketing is applied.

3.2 Priority Firm Exchange Rate Design

The PFx rate applies to participants in the Residential Exchange Program for sales of exchange energy pursuant to a Residential Sale and Purchase Agreement (RPSA) or an REP Settlement Implementation Agreement (REPSIA). Under either an RPSA or REPSIA, the PFx rate is applied to BPA's sales of exchange energy, and the participating utility's ASC is applied to BPA's purchase of exchange energy, where the exchange energy is equal to the utility's eligible residential and small farm load. The difference between the amount BPA pays for exchange "purchases" and the amount BPA receives for exchange "sales" determines the amount of monetary REP benefits BPA pays the utility. The PFx rate also applies to any actual power sales to exchanging utilities under contractual "in-lieu" provisions.

The PFx rate is comprised of two components: two common Base PFx rates (one for COUs with CHWM contracts and another for all other participants), and utility-specific REP Surcharges. Neither component of the PFx rate is diurnally differentiated or contains an additional charge for demand. Each participant's ASC is a single mills/kWh rate applied to all kilowatthours. Likewise, the rate design for each participant's PFx rate is a single mills/kWh rate applied to all kilowatthours.

The two Base PFx rates are computed within RAM based on the average PF rate immediately prior to the determination of section 7(b)(2) rate protection. At this point in the ratemaking process, no 7(b)(2) rate protection has been determined, so the Base PFx rates bear no rate protection costs. The PFx rate applicable to IOUs (and any eligible COU without a CHWM contract) is computed by dividing all costs allocated to the PF rate pool by all PF rate pool loads and then adding a transmission charge for delivering the exchange power to the customer. The PFx rate applicable to COUs with CHWM contracts is calculated in the same manner, except that the costs allocated to Tier 2 cost pools are excluded from the numerator, and loads served at Tier 2 rates are excluded from the denominator.

Under the 2012 REP Settlement, the utility-specific 7(b)(3) surcharge to recover the cost of providing 7(b)(2) rate protection continues to be assessed, but the surcharge for IOUs also includes the allocation of the costs of Refund Amounts. See section 2.2.1.3. The amount of 7(b)(2) rate protection costs allocated to the PFx rates is allocated to each REP participant on a pro rata basis using REP benefits calculated using the Base PFx rates (Unconstrained Benefits) as the allocator. The cost of Refund Amounts is allocated to each IOU using IOU Unconstrained Benefits as the allocator. The total amount allocated to each REP participant is divided by the participant's exchange load to derive its utility-specific 7(b)(3) surcharge.

For each REP participant, the applicable Base PFx rate is added to its utility-specific 7(b)(3) surcharge to determine its utility-specific PFx rate. For each month of the rate period, the participant will submit to BPA its exchange load for the prior month. BPA will multiply this invoiced exchange load by the difference between the participant's ASC and its PFx rate to calculate the amount of REP benefits payable to the participant. See Documentation Table 2.4.11.

3.3 Industrial Firm Power (IP) Rate Design

3.3.1 IP Energy Rates

The IP rate design includes 24 monthly/diurnal Energy rates, two for each month, one each for HLH and LLH. Monthly and diurnal differentiation of IP energy rates is performed based on the HLH and LLH differentiation of the PFp Melded rate (see section 3.1.14).

IP energy rates are determined by adjusting the PFp Melded rates by the VOR credit for operating reserves provided by the DSI load, the typical industrial margin, and a REP surcharge. See Documentation Table 2.5.8.3.

3.3.1.1 IP Adjustment for Value of Reserves Provided

A VOR credit is included in the IP rate, as provided in section 7(c)(3) of the Northwest Power Act. See section 1.2.2. The FY 2014-2015 rate period DSI power sales forecast is 312 aMW for both years. See Power Loads and Resources Study section 2.4. Based on provisions of DSI contracts currently in place, these power sales are assumed to provide interruption reserve rights (operating reserves) to BPA, and therefore the IP rate includes a VOR credit.

The first step for valuing operating reserves provided by DSIs is to determine a marginal price for these reserves. Because the DSI-supplied reserves are used to meet BPA's reserve obligations, the cost of Operating Reserves – Supplemental is used to establish the marginal value.

The second step in valuing the DSI reserves is to determine the quantity of reserves provided. To calculate this quantity, the total load of aluminum DSIs is reduced to account for wheel-turning load that cannot be curtailed. The wheel-turning load for aluminum DSIs is forecast to be 6 aMW. The interruption reserves provided are 10 percent of the remaining aluminum DSI load. The VOR credit included in the IP-12 rate is 0.975 mills/kWh. See Documentation Table 2.4.1 for calculation of the value of DSI reserves.

3.3.1.2 IP Rate Typical Margin

Another component of the IP rate is the typical margin, as provided in section 7(c)(2) of the Northwest Power Act. See section 1.2.2. The typical margin is based generally on the overhead costs that COUs add to the cost of power in setting their retail industrial rates. The typical margin included in the IP-14 rate is 0.709 mills/kWh. The methods and calculations used to determine the typical margin are discussed in Appendix A.

3.3.1.3 REP Surcharge

The final component of the IP rate is the REP Surcharge. Section 7(b)(3) of the Northwest Power Act provides that the cost of 7(b)(2) rate protection afforded to preference customers be allocated to all other power sold, which includes power sold at the IP rate. See section 1.2.2. The cost of rate protection allocated to the IP rate is determined pursuant to the 2012 REP Settlement and is included in the IP-14 rate. The IP-14 REP Surcharge is 7.65 mills/kWh. See Documentation Table 2.4.14 for calculation of the REP Surcharge.

3.3.2 IP Demand Rates

The Demand rates for the IP rate schedule are equal to the PFp Demand rates, as described in section 3.1.6.3.

As with the PFp Demand charge, the IP Demand billing determinant is applied to only a portion of the DSI peak demand placed on BPA. The IP Demand billing determinant in each billing month will be equal to the DSI's highest HLH schedule, or metered amount, minus the average HLH schedule amount, or metered amount, less any applicable Industrial Demand Adjuster.

The Industrial Demand Adjuster is a monthly quantity of demand (expressed in kilowatts) that is subtracted from the hourly peak schedule amount when calculating the IP Demand billing determinant. Power Rate Schedules, BP-14-E-BPA-09, *e.g.*, Schedule IP-14, section 2.2.2.

3.4 New Resources (NR) Rate Design

3.4.1 NR Energy Rates

Monthly and diurnal differentiation of NR energy rates is calculated based on the HLH and LLH differentiation of the PFp Load Shaping rates. See Documentation Table 2.5.8.4.

The NR energy rates are determined by adjusting each PFp Load Shaping rate by an equal scalar until the NR energy rates recover the allocated NR revenue requirement minus the forecast Demand charge revenue. See Documentation Table 2.5.8.4.

After the scaling process is complete, an REP Surcharge is added to each of the monthly/diurnal energy rates. Section 7(b)(3) of the Northwest Power Act provides that the cost of 7(b)(2) rate protection afforded to preference customers be allocated to all other power sold, which includes power sold at the NR rate. See section 1.2.2. The cost of rate protection allocated to the NR rate is determined pursuant to the 2012 REP Settlement. The NR-14 REP Surcharge is 7.65 mills/kWh. See Documentation Table 2.4.14 for calculation of the REP Surcharge.

3.4.2 NR Demand Rates

The Demand rates for the NR rate schedule are equal to the PFp Demand rates, as described in section 3.1.6.3.

As with the PFp Demand charge, the NR Demand billing determinant is only a portion of the peak demand placed on BPA. The NR Demand billing determinant will be equal to the highest NR Hourly Load during HLH less the average hourly HLH energy purchased in that particular month at the NR energy rates.

3.4.3 NR Energy Shaping Service for NLSL

The NR Energy Shaping Service is offered to Load Following customers that need a service that shapes a dedicated resource serving an NLSL to the actual load of the NLSL. The service credits or debits the customer for difference between the dedicated resource amount during a monthly diurnal period and the measured NLSL load during that same monthly diurnal period. A True-Up is applied at the end of each fiscal year to ensure that any net positive power purchased from BPA at the NR Energy Shaping rates is paid for at the applicable NR energy rate.

3.4.3.1 NR Energy Shaping Rates

The NR rate schedule includes 24 Energy Shaping rates (two diurnal periods—HLH and LLH—for each of 12 months) applicable to the NR Energy Shaping Service. The Energy Shaping rates are set equal to the rate period average marginal cost of power for each monthly/diurnal period as determined in Power Risk and Market Price Study section 2.4. Also see Documentation Table 3.3.

3.4.3.2 NR Energy Shaping Billing Determinant

There are two energy billing determinants each month, one for the HLH and one for the LLH. Each monthly energy billing determinant is equal to the measured NLSL load during the monthly/diurnal period less the dedicated resource amount serving that load during that same monthly diurnal period. The billing determinant for any period can be negative.

3.4.3.3 NR Energy Shaping Service True-Up

The NR Energy Shaping Service True-Up is an adjustment to the NR Energy Shaping Service that will ensure that each customer pays the NR rate for BPA energy that the customer used to serve an NLSL. At the end of each fiscal year, BPA will calculate the NR Energy Shaping Service True-Up by netting the billing determinants for a fiscal year. If the amount is greater than zero, the amount is multiplied by the rate specified in GRSP II.G.

3.5 Firm Power Products and Services Rate Design, Resource Support Services, and Transmission Scheduling Service

Products and services available under the FPS rate schedule are described in BPA's BP-14 Power Rate Schedules, BP-14-E-BPA-09, section FPS-14. Sales under this rate schedule are discretionary; BPA is not obligated to sell any of these products, even if such sales will not displace PF, NR, or IP sales. Products priced under the FPS-14 rate schedule may be sold at market-based or negotiated rates, which may have a demand component, an energy component, or both. Applicable transmission rates will apply to the extent required to purchases of firm power under the FPS-14 rate.

The FPS rate schedule provides for seven products and services: (1) Firm Power and Capacity Without Energy; (2) Supplemental Control Area Services; (3) Shaping Services; (4) Reservations and Rights to Change Services; (5) Reassignment or Remarketing of Surplus Transmission Capacity; (6) Services for Non-Federal Resources; and (7) Unanticipated Load Service.

3.5.1 Firm Power and Capacity Without Energy

When available, BPA sells firm power, including secondary energy or firm capacity, for use within the Pacific Northwest and outside of the Pacific Northwest. Such power sales are made under the FPS rate schedule at rates and billing determinants specified by BPA or as mutually agreed by BPA and the customer. Sales of firm power may be subject to a REP Surcharge. The applicability of a REP Surcharge will be made by BPA at the time of the sale, as set forth in the 2012 REP Settlement Agreement.

3.5.2 Supplemental Control Area Services

BPA sells supplemental control area services, when available, for use within the Pacific Northwest and outside of the Pacific Northwest. Such services are sold under the FPS rate schedule at rates and billing determinants specified by BPA or as mutually agreed by BPA and the customer.

3.5.3 Shaping Services

BPA sells shaping services, when available, for use within the Pacific Northwest and outside of the Pacific Northwest. Such services are sold under the FPS rate schedule at rates and billing determinants specified by BPA or as mutually agreed by BPA and the customer.

3.5.4 Reservations and Rights to Change Services

BPA offers reservations of power and services, when available, and the rights to change sales and services for use within the Pacific Northwest and outside of the Pacific Northwest. Such services are sold under the FPS rate schedule at rates and billing determinants specified by BPA or as mutually agreed by BPA and the customer.

3.5.5 Reassignment or Remarketing of Surplus Transmission Capacity

Power Services reassigns or remarkets its surplus transmission capacity, when available, that has been purchased from a transmission provider, including Transmission Services, consistent with the terms of the transmission provider's Open Access Transmission Tariff. Power Services sells this surplus transmission capacity to parties within the Pacific Northwest and outside of the Pacific Northwest. Such services are sold under the FPS rate schedule at rates and billing determinants specified by BPA or as mutually agreed by BPA and the customer.

3.5.6 Services for Non-Federal Resources

BPA is offering Forced Outage Reserve Service (FORS) and Transmission Scheduling Service (TSS) at posted FPS rates. FORS is one of the Resource Support Services and is offered under the FPS rate schedule to customers with resources that meet specific requirements specified in the CHWM contract. FORS for customers without CHWM contracts would be offered, if available, under the Reservations and Rights to Change Services part of the FPS rate schedule. Further information is provided in section 3.5.6.1 below.

TSS is not a Resource Support Service but is related to the services that comprise RSS and is being offered under the FPS rate schedule. It is a required service for customers with resources that meet eligibility requirements specified in the CHWM contract. Further details on TSS and TCMS are provided in section 3.5.6.2 below.

TCMS is also not a Resource Support Service but is related to TSS and is being offered under the FPS rate schedule. It is a service for customers with resources that meet eligibility requirements specified in the CHWM contract.

In order to be prepared when and if customers request RRS, BPA is also including pricing for this service for the first time. RRS is a service that BPA may make available at its discretion to Load Following customers where BPA remarkets non-Federal resources on behalf of customers and provides them with a remarketing credit net of possible remarketing fees for doing so. Further details on RRS are provided in section 3.5.6.3 below.

The FPS rate schedule includes a section on the general rate application of the FORS-, TSS-, and RRS-related charges and credits. The GRSPs include the formulas for calculating the FORS Capacity and

Energy Charges, TSS and TCMS Charges, and RRS Credit for the resources to which FORS, TSS/TMCS, or RRS is applied.

3.5.6.1 Forced Outage Reserve Service

FORS is an optional service for BPA to provide an agreed-upon amount of capacity and energy to customers with a qualifying resource that experiences a forced outage. This service can be considered to be an insurance product in the event of an unforeseen outage at a generating resource. If a Load Following customer does not choose to take this service, it must supply replacement power if its resource experiences a forced outage. Unless stated otherwise, the resource amounts used in these calculations are those specified in the customer's CHWM contract Exhibit D (Exhibit D amounts) and are planned generation amounts based on hourly generation from the most-recent historical year.

3.5.6.1.1 FORS Pricing Summary

The charges for FORS are intended to reflect the cost of BPA (1) reserving capacity to back up a resource as insurance to cover a potential forced outage and (2) providing replacement energy should a forced outage occur.

The FORS Charges include the following elements:

- A FORS Capacity charge based on the PFp Tier 1 Demand rate, the calculated firm capacity of the resource for customers whose resource is also taking DFS, and the forced outage rating for the applicable resource.
- A FORS Energy charge based on a Mid-C index price under two conditions and the kilowatthours supplied during a forced outage event.

3.5.6.1.2 FORS Capacity Charge

FORS Capacity Rates. The rates used to calculate the FORS Capacity charge are based on the PFp Demand rates and are listed in GRSP II.U.3.(a)(1).

FORS Capacity Billing Determinant. For each resource, the Capacity billing determinant is the monthly firm capacity multiplied by the forced outage rating. The firm capacity is calculated by the RSS module of RAM in the manner described for the DFS Capacity billing determinant. See section 3.1.15.2.2. The forced outage rating for a resource taking FORS has the same considerations as described in section 3.1.15.4.1.

FORS Capacity Charge. For each resource, the FORS Capacity charge is the product of multiplying the FORS Capacity rate by the FORS Capacity billing determinant for each month. The sum of the monthly values is divided by 12 to calculate a flat monthly charge. The FORS Capacity charge will be specified in section 2.4.5.3 of Exhibit D of the CHWM contract. Documentation Table 3.17 shows the FORS Capacity charges that are calculated for each resource currently requesting FORS. The formula for calculating the FORS Capacity charge for each individual resource to which FORS is applied is shown in GRSP II.U.3.(a)(3).

3.5.6.1.3 FORS Energy Charge

The purpose of the energy charge is to pass through the cost of replacement energy that BPA provides during a customer's forced outage.

FORS Energy Rate. The rate for the energy provided during the first 24 hours of a forced outage will be the average of the hourly Powerdex Mid-C Price or its replacement during the hours of the forced outage. The rate for energy provided after the first 24 hours of a forced outage will be the diurnal Intercontinental Exchange (ICE) Mid-C Day Ahead Power Price Index or its replacement for the applicable diurnal period the energy is provided. If any of the Mid-C prices specified above is less than zero, the FORS energy rate calculation will be zero for such negative value.

FORS Energy Billing Determinant. The FORS energy billing determinant is the total actual replacement energy a resource requires to meet the planned generation amount specified in Exhibit D of the customer's CHWM contract, subject to the FORS energy limits specified therein.

FORS Energy Charge. For each resource, the FORS energy charge is the product of multiplying the FORS energy rate by the FORS energy billing determinant. GRSP II.U.3.(b) shows the formula for calculating the FORS energy charges for the individual resources to which FORS is applied.

3.5.6.2 Transmission Scheduling Service and Transmission Curtailment Management Service

TSS is a service provided by Power Services to undertake certain scheduling obligations on behalf of the customer. TCMS is a feature of TSS under which BPA provides either replacement transmission or replacement energy to customers that have qualifying resources that experience transmission events pursuant to the conditions specified in Exhibit F of the CHWM contract.

If a Load Following customer is served by transfer or is purchasing DFS or SCS services from BPA, it is required to have the TSS provisions added to its CHWM contract. Many customers meeting these criteria do not have a non-Federal resource with an e-Tag that must be scheduled to their load. Only customers that have a non-Federal resource that requires an e-Tag will be charged for TSS services. Pursuant to the Load Following CHWM contract, for a customer that is not required to take TSS given the criteria described above, TSS is an optional service if the customer wishes to have BPA produce the e-Tags for its resource(s). If a Load Following customer with a non-Federal resource is not required by its contract to take this service or elects not to take this service, it is required to supply replacement transmission or power when the resource's transmission path experiences an outage or curtailment. If it is unable to do so, it may face an Unauthorized Increase (UAI) charge.

3.5.6.2.1 TSS/TCMS Pricing Summary

The charge for TSS reflects the cost of scheduling a resource to its Point of Delivery (POD). The charge for TCMS reflects the cost of providing either replacement transmission or replacement energy when a transmission event occurs. A unique set of charges will be calculated for each resource to which TSS and TCMS are applied. The TSS and TCMS services are applicable to only certain resources a customer may have, as described in Exhibit F of the Load Following CHWM contract. Certain customers must have the TSS provisions included in their CHWM contracts even though they do not have non-Federal resources scheduled to load. These customers will not have a separate TSS charge on their bill. TSS may apply to a resource and TCMS may not, but TCMS will never apply to a resource to which TSS does not apply.

The TSS/TCMS charges include the following elements:

- A monthly TSS charge based on the dedicated resource megawatthour amounts found in Exhibit A of the Load Following CHWM contract for FY 2014 and FY 2015 for Specified and Unspecified Resource amounts for resources requiring an e-Tag. Although the contract states these values in megawatthours, BPA bills on kilowatthours, so the appropriate conversion is made.
- A TSS rate that is based on the Operations Scheduling costs for the two years of the rate period divided by the total megawatthours BPA has scheduled in the two most-recent historical years.
- An after-the-fact TCMS charge based on replacement power or transmission costs caused by a transmission event.

3.5.6.2.2 TSS Charge

TSS Rate. The RSS module of RAM calculates a TSS rate that is applied to the billing determinant described below. The rate is calculated by dividing the forecast operations scheduling cost for the rate period (including costs associated with power scheduling preschedule, real-time, and after-the-fact functions) by the total megawatthours of power BPA scheduled in FY 2011 and FY 2012. See Documentation Table 3.7.

TSS Billing Determinant. The TSS billing determinant is the total kilowatthours of planned generation the customer has dedicated to load during the rate period, as specified in Exhibit A of the CHWM contract.

TSS Charge. For each resource, the TSS Charge is the product of multiplying the TSS rate by the TSS billing determinant for each month of the rate period (or an individual fiscal year if this service applies in only one fiscal year). The sum of the monthly values is divided by 24 (or 12 if the service applies in only one fiscal year) to calculate a flat monthly charge.

The TSS charge is subject to a cap such that if the annual cost to the customer using the TSS rate exceeds $990/month, then the monthly charge is capped at $990/month. The cap is schedule transaction-based. It is the result of multiplying 30 (the average number of schedules in a month, *i.e.*, one per day) by the forecast operations scheduling cost for the rate period, divided by the total number of schedules Power Services produced in FY 2011 and FY 2012.

In the applicable fiscal year BPA will directly assign to applicable TSS customers the Open Access Technology International, Inc. (OATI) registration fee BPA forecasts to incur on their behalf. Table 3.19 of the Documentation lists the customers subject to the OATI registration fee.

Table 3.17 of the Documentation shows the individual TSS charges that are calculated for the individual resources to which only TSS is applied and individual resources to which TSS is applied in addition to other RSS products. GRSP II.U.4.(a)(3) shows the formula for calculating the TSS charge for the individual resources to which TSS is applied.

3.5.6.2.3 TCMS Charge

A TCMS rate is applied to recover replacement power or transmission costs based on actual transmission events that occur on the planned delivery path between a customer's resource and its load. These transmission events and resource eligibility requirements are defined by terms specified in Exhibit F of the customer's CHWM contract.

TCMS Charge if Replacement Power is Provided. The TCMS rate will be the Powerdex Mid-C hourly index price or its replacement for each hour the transmission event occurs. If a Mid-C price is less than zero, the TCMS energy rate for that hour will be zero. The TCMS billing determinant is the total actual kilowatthours in each hour of replacement power BPA supplies. For each eligible resource, the TCMS charge is the product of multiplying the TCMS rate by the TCMS billing determinant for each hour of the month.

TCMS Charge if Alternative Transmission is Provided. If Point-to-Point transmission is used for the alternate transmission path used to deliver the customer's eligible resource, for each resource the TCMS charge is the cost of the additional Point-to-Point transmission purchases plus any additional costs, including real power losses, associated with using the replacement transmission.

GRSP II.U.4.(b)(3) shows the formula for calculating the TCMS charges for the individual resources to which TCMS is applied.

For the BP-14 rate period, the TCMS charge does not include a non-firm Network or Point-to-Point Reservation Fee. BPA is reserving the right to include such a fee in future rate periods for customers wheeling their non-Federal resource to their loads on non-firm Network or non-firm Point-to-Point transmission.

Application of TCMS to the Tier 2 rates is described in section 3.1.9.1.

3.5.6.3 Resource Remarketing Service

Exhibit D of the CHWM contract for Load Following customers offers an optional service for customers that have purchased non-Federal resources in anticipation of future need. At the customer's request and with BPA's agreement, BPA will remarket the excess non-Federal resource amounts on the customer's behalf until the customer's need meets or exceeds that non-Federal resource amount. In order to qualify for this service the customer must also request DFS for the non-Federal resource. The DFS charges will be applicable to both the non-Federal resource amounts the customer dedicates to its load and any portion that BPA remarkets on the customer's behalf. BPA has not agreed to provide this service for any customers yet, but there may be interest in it during the BP-14 rate period.

3.5.6.3.1 RRS Credit

RRS Rate. For each non-Federal resource, if the planned resource generation in excess of the customer's Above-RHWM load can be used by BPA toward meeting a portion of the remaining Tier 2 Short-Term load obligation plus losses that BPA must serve, then the rate will be the price at which BPA purchases power to meet the remaining Short-Term load obligation plus losses. If the amount is not used to meet a portion of the remaining Short-Term load, then the rate will be the flat annual equivalent of the PF Load Shaping rates.

RRS Billing Determinant. The RRS billing determinant will be the annual average megawatt Resource Remarketed Amounts in the customer's CHWM contract Exhibit D (when updated).

RRS Credit. For each resource, the RRS Credit will be the product of multiplying the RRS rate by the RRS billing determinant for each applicable year of the rate period. The annual value is divided by 12 to calculate a flat monthly credit.

RRS Fee. The fee for providing RRS to Customers is determined on a case-by-case basis.

3.5.6.4 TSS Charge Application to Tier 1 Augmentation

TRM section 8 states that RSS pricing will be used to make Federal resource acquisitions financially equivalent to a flat block. In addition, Tier 1 Augmentation is assumed for ratemaking purposes to be in the shape of an annual flat block purchase. TRM section 3.5. The one resource whose costs are allocated to Tier 1 Augmentation is Klondike III, a scheduled resource that requires an e-Tag. The RAM RSS module calculates a TSS charge for this resource. The TSS charge is added to the RSS charges for each year of the rate period that are allocated to the Composite cost pool under the "Non-Slice Augmentation RSC Revenue Debit/(Credit)" line item.

3.5.6.5 Credits to the PFp Tier 1 Customer Rate Cost Pools

Forecast revenue credits are calculated from the RSS charges. All revenues, except those from the Resource Shaping Charge, are allocated as credits to the Composite Customer cost pool. The forecast revenue from the Resource Shaping Charge is allocated as a credit to the Non-Slice Customer cost pool. Additional information on these revenue credits is found in sections 3.1.2.1 and 3.1.2.2.

3.5.7 Unanticipated Load Service (ULS)

Under the FPS-14 rate schedule, the Resource Replacement (RR) rate will be applied to Unanticipated Load Service for circumstances that cause an increase in a customer's load placed on BPA and not anticipated in the rate case. Such circumstances could include but are not limited to delays in the on-line date of a customer's specified resource for Above-RHWM service, New Specified Resources that are 10 aMW or less and either experience permanent failure during the rate period or fail to come online, and Transfer customers that both (1) cannot secure Firm Network Transmission (NT) from source to sink for their Dedicated Non-Federal resource to their Above-RHWM load by the time power deliveries are to begin under the Regional Dialogue contract and (2) are expected to face high TCMS charges due to their reliance on Secondary Network Transmission while they pursue Firm Network Transmission. The provision of ULS will be at BPA's sole discretion.

The energy rate for the RR rate is equal to the Load Shaping rate or the projected market price calculated when a request for ULS is made, whichever is greater. See section 3.1.6.2 for a description of the Load Shaping rate. The ULS Demand rate is equal to the PFp Demand rate, described in section 3.1.6.3. The ULS under the FPS-14 rate schedule is specified in GRSP II.Z.4.

3.6 General Transfer Agreement Service Rate Design

Transfer Services are the transmission and distribution services BPA acquires from other transmission providers to transmit Federal power to BPA customers located within third-party-owned transmission systems. Transfer Service customers may be subject to one or two separate charges from BPA under the General Transfer Agreement Service (GTA-14) rate: (1) the General Transfer Agreement (GTA) Delivery Charge, and (2) the Transfer Service Operating Reserve Charge. In addition to these charges, Transfer Service customers are responsible for the cost of any distribution upgrades associated with their respective points of delivery, as provided in the Supplemental Direct Assignment Guidelines (GRSP I.E.).

3.6.1 GTA Delivery Charge

The GTA Delivery Charge, section I of the GTA-14 rate schedule, is a charge for low-voltage delivery service of Federal power provided under GTAs and other non-Federal transmission service agreements over a third-party transmission system. The GTA Delivery Charge applies to power customers that take delivery at voltages below 34.5 kV unless such costs have been directly assigned to the specific customer.

Since 2002, the GTA Delivery Charge has mirrored the Transmission Services Utility Delivery Charge. For the FY 2012-2013 rate period, the Transmission Services Utility Delivery rate was set at $1.119 per kilowatt per month; GTA-12 was consistent with that rate. The GTA Delivery Charge has also used the same billing determinant as the UDC, the Transmission Services' system peak.

For the FY 2014-2015 rate period, the GTA-14 Delivery Charge is calculated as a separate, stand-alone rate. As described in the following paragraph, the rate is $0.818 per kilowatt per month. The billing determinant for the GTA-14 Delivery Charge changes from Transmission Services' system peak to the customer system peak, which is the same billing determinant Power Services uses to calculate the customer's power bill.

3.6.1.1 GTA-14 Delivery Charge Revenue Requirement

The revenue requirement for the GTA-14 Delivery Charge is computed using FY 2011 transmission provider invoices for low-voltage distribution and delivery charges and contract exhibits. The one exception is NorthWestern Energy (NorthWestern), which does not charge separately for low-voltage delivery. To estimate a cost for NorthWestern, the average cost of all other transmission providers is applied to the loads delivered to Power Services' low-voltage customers served on NorthWestern's system. FY 2011 numbers are adjusted by applying an annual 0.97 percent escalation (for load growth) through FY 2014 and FY 2015. The average of the FY 2014 and FY 2015 numbers serves as the numerator in the GTA-14 Delivery Charge rate calculation.

3.6.1.2 GTA-14 Delivery Charge Billing Determinant

The FY 2011 Customer System Peak is determined by reviewing customer bills and extracting customer load data for the low voltage PODs at customer system peak. The values are escalated annually by 0.97 percent (for load growth) through FY 2014 and FY 2015. The average of the FY 2014 and FY 2015 numbers serves as the denominator in the GTA-14 Delivery Charge rate calculation.

The FY 2014-2015 average revenue requirement is divided by the FY 2014-2015 average customer system peak to calculate the rate, as shown below:

Distribution and Low Voltage Costs Average FY 2014-2015:	$2,053,356
BPA Customer System Peak Average FY 2014-2015:	2,511,138
GTA-14 Rate FY 2014-2015:	$0.818

3.6.2 Transfer Service Operating Reserve Charge

The Transfer Service Operating Reserve Charge is designed to address a potential change in Operating Reserve obligations. Currently, Power Services does not acquire Operating Reserves, Schedule 5 and 6 of the Open Access Transmission Tariff (OATT), for delivery of Federal power to customers served by transfer. Transfer Service customers already pay for these deliveries under the terms of their Network Transmission agreement with Transmission Services. This arrangement reflects the existing reliability requirement that Operating Reserves need be carried only by the balancing authority area in which the transmission customer’s resources operate.

The Western Electricity Coordinating Council (WECC) is proposing that the Commission change this requirement. If proposed operational change BAL-002-WECC-1 is approved by the Commission, a portion of the Operating Reserve obligation for the BPA balancing authority area associated with Transfer Service customers would shift to the balancing authority areas where the Transfer Service customers' loads are located. This proposed change is known as the "3 and 3" reliability standard. This change, if adopted, would shift a portion of the costs for Operating Reserves from Transfer Service customers to BPA.

In anticipation of this potential change, the Transfer Service Operating Reserve Charge for the FY 2014-2015 rate period is designed to mitigate the cost shift described above in the event the Commission adopts WECC's proposed change. The Transfer Service Operating Reserve Charge rate, if assessed, would be the same as the ACS-14 rate for Operating Reserves that Transmission Services charges to customers that have load in the BPA balancing authority area.

Due to the uncertainty around whether and when WECC's proposed changes may be adopted by the Commission and implemented by the various transmission providers, the implementation of the Transfer Service Operating Reserve Charge has been conditioned upon the satisfaction of three criteria: (1) BPA serves the power customer by Transfer Service; (2) the Transfer Service customer does not pay Transmission Services for Operating Reserves based on the "3 and 3" reliability standard for the customer's load; and (3) BPA is assessed Operating Reserve charges from a third-party transmission provider to transfer Federal power to the power customer's load. Power Services intends to assess the Transfer Service Operating Reserve Charge only if all three criteria have been satisfied.

The forecast revenue associated with the Transfer Service Operating Reserve Charge is zero, because implementation of the Transfer Service Operating Reserve Charge will generally result in no net revenue impact. It is anticipated that the increased revenue from Transfer Service customers will be offset by the increased ancillary service costs Power Services will pay to third-party transmission systems.

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4. REVENUE FORECAST

The revenue forecast calculates the expected revenue from power rates and other sources for the rate period, FY 2014-2015, as well as the current year, FY 2013. Two revenue forecasts are prepared. The first uses rates from the rate schedules currently in effect, and the second uses proposed rates. The revenue forecasts are used to test whether current rates and proposed rates will recover the power revenue requirement. If the revenue test shows that revenues at current rates will not generate sufficient revenue to recover the power revenue requirement, new rates are calculated, and revenues at proposed rates are generated. See Power Revenue Requirement Study, BP-14-E-BPA-02, sections 3.2 and 3.3. Both forecasts are based on the Power Loads and Resources Study, BP-14-E-BPA-03, forecast of firm loads for the current fiscal year and the rate period. Because the same load forecast is used for both revenue forecasts, the only revenues that change between current and proposed rates are Priority Firm (PF), Industrial Power (IP), and Generation Inputs revenues. All other revenues remain constant between the two forecasts.

In addition to forecasts of revenues, this chapter of the Study presents power purchase expenses that are directly related to balancing purchases needed to meet load under different water conditions. Power purchases are included in the forecast for FY 2013-2015 and discussed in section 4.5.

The revenue forecast includes revenue calculations for the current year, FY 2013, to estimate the amount of financial reserves available to BPA at the beginning of the rate period. See Power Revenue Requirement Study section 1.1.

The revenue forecast is divided into four main categories: (1) gross revenues, described in section 4.1; (2) miscellaneous revenues, described in section 4.2; (3) revenues from generation inputs for ancillary, control area, and other services, described in section 4.3; and (4) Treasury credits, described in section 4.4.

4.1 Revenue Forecast for Gross Sales

Gross Sales is the largest category of revenue for Power Services. There are eight sources of revenue in this category: firm power sales under the CHWM contracts, described in section 4.1.1; Industrial Firm Power sales to DSIs, described in section 4.1.2; pre-Subscription contract sales, described in section 4.1.3; short-term market sales, described in section 4.1.4; long-term contractual obligations, described in section 4.1.5; Canadian entitlement returns, described in section 4.1.6; Renewable Energy Certificates, described in section 4.1.7; and other sales, described in section 4.1.8.

4.1.1 Firm Power Sales under CHWM Contracts

For FY 2013, the revenues from Priority Firm power sales pursuant to CHWM contracts are calculated using the product of (1) forecast loads documented in Power Loads and Resource Study section 2.2 and accompanying Documentation Table 1.2.1 for energy, Table 1.2.2 for HLH, and Table 1.2.3 for LLH; and (2) BP-12 power rates found in 2012 Wholesale Power Rate Schedules, Section PF-12. Revenues from PF power sales pursuant to CHWM contracts for FY 2013 are listed in PRS Table 2, lines 3–9, and in Documentation Table 4.1, lines 3–9.

For FY 2014-2015, revenues from PF power sales pursuant to CHWM Contracts are computed using the product of (1) forecast loads assuming normal weather, documented in the Power Loads and Resources Study and accompanying Documentation; and (2) the appropriate PF rates derived by RAM2014. Inputs and results for the revenue forecast are managed and calculated pursuant to the CHWM Contracts using the Revenue Forecasting Application (RFA). Revenues are reported for Tier 1 Customer Composite charges (Slice and Non-Slice), Load Shaping, and Demand (including the Low Density Discount and Irrigation Rate Discount credits), and any additional Tier 2 or RSS charges.

4.1.1.1 Composite and Non-Slice Customer Charges

Revenues from each customer for the Composite and Non-Slice Customer charges are based on the customer's TOCA and the customer's contractually specified products. Revenues obtained from the Composite and Non-Slice Customer charges represent the majority of revenues from firm power sales under CHWM Contracts. An example calculation of the Composite and Non-Slice charge is available in Documentation Table 4.3. Composite and Non-Slice revenues for FY 2014-2015 are listed in Table 3, lines 3–4, and Documentation Table 4.2, lines 3–4.

4.1.1.2 Load Shaping Charge

The Load Shaping charge reflects the costs and benefits of shaping the Tier 1 System Capability to the monthly and diurnal shape of a customer's below-RHWM load. A charge to the customer results when the customer's shaped load is greater than its share of the Tier 1 System Output in any month for both HLH and LLH; the customer will receive a credit from BPA when the opposite occurs. The Load Shaping charge is described in section 3.1.6.2, and an example calculation of the Load Shaping charge is available in Documentation Table 4.4. Load Shaping revenues for FY 2014-2015 are listed in Table 3, line 6, and Documentation Table 4.2, line 6.

4.1.1.3 Demand Charge

The Demand charge is applicable to customers purchasing Load Following or Block with Shaping Capacity products; however, for FY 2014-2015, there are no customers purchasing Block with Shaping Capacity. The Demand charge is calculated using customer-specific information including actual Customer Tier 1 System Peak, average actual monthly Below-HWM load occurring in HLH, CDQs, and

Super Peak Credit (if applicable). Calculation of a customer's Demand charge is described in section 3.1.6.3, and an example calculation is available in Documentation Table 4.4. Demand revenues for FY 2014-2015 are listed in Table 3, line 7, and in Documentation Table 4.2, line 7.

4.1.1.4 Irrigation Rate Discount (IRD)

The IRD is a rate credit available to eligible customers and provides a fixed rate discount on Tier 1 rates. May through September eligible irrigation loads are identified in each customer's CHWM Contract. The discount does not apply to loads served at Tier 2 rates. A methodology for calculating an end-of-year true-up appears in GRSP II.K.3. Forecast credits for irrigation loads will be calculated using an IRD that is derived by multiplying the irrigation loads identified in the CHWM contracts by the IRD rate. The IRD is described in section 3.1.11, and an example calculation is available in Documentation Table 4.5. IRD credits for FY 2014-2015 are listed in Table 3, line 8, and Documentation Table 4.2, line 8.

4.1.1.5 Low Density Discount (LDD)

The LDD is provided for in section 7(d)(1) of the Northwest Power Act and offers a discount to avoid adverse impacts on retail rates of BPA's customers with low system densities. Discounts up to 7 percent are available for customers that meet criteria specified in GRSP II.M. As set forth in the TRM, LDD percentages are calculated to provide a discount on power purchased at Tier 1 rates that approximates the discount the customer would have received under non-tiered rates. An example calculation is available in Documentation Table 4.6. LDD credits for FY 2014-2015 are listed in Table 3, line 9, and in Documentation Table 4.2, line 9.

4.1.1.6 Tier 2 and Resource Support Services (RSS)

Tier 2 rates are based on a cost allocation that fully recovers the cost of BPA service to Above-RHWM load. Tier 2 Revenues are based on sales to customers that have elected to have BPA serve their Above-RHWM load. Revenues for FY 2014-2015 are listed in Table 3, line 10, and Documentation Table 4.2, line 10.

RSS allows a customer to apply the variable output of a resource to serve its Above-RHWM load without having to guarantee a specific scheduled shape of this resource. These services are available for all specified non-Federal resources that Load Following customers contractually dedicate to serve their total retail load and for specified new renewable resources that Slice/Block customers contractually dedicate to serve their total retail load. Revenues from these services are based on known services chosen by customers. Revenues for FY 2014-2015 are listed in Table 3, line 11, and Documentation Table 4.2, line 11.

4.1.2 Sales to Direct Service Industrial (DSI) Customers

BPA sells power to DSIs at the IP rate. Revenues from the IP rate are computed using the product of (1) forecast loads of 320 aMW for FY 2013 and 312 aMW for FY 2014-2015, documented in Power Loads and Resources Study section 2.3 and accompanying Documentation Table 1.2.1 for energy, Table 1.2.2 for HLH, and Table 1.2.3 for LLH; and (2) the appropriate IP rate from RAM2014. For FY 2013, the revenues for DSI customers are calculated using the IP-12 rate. Revenues for FY 2013-2015 are listed in PRS Table 3, line 13, and Documentation Table 4.2, line 13.

4.1.3 Pre-Subscription Sales

During FY 2013-2015, BPA is providing power to one customer under a pre-Subscription contract. The revenues from the pre-Subscription customer are derived by multiplying the individual customer loads by the appropriate FPS rate, both of which are set pursuant to the pre-Subscription contract. Revenues for FY 2013-2015 are listed in Table 3, line 14, and Documentation Table 4.2, line 14.

4.1.4 Short-Term Market Sales

The revenue forecast includes revenues from the sales of surplus energy, which can be a combination of secondary energy, energy that comes from streamflows in excess of 1937 water conditions, and firm energy, energy that results from firm resources in excess of that required to serve firm loads. For rate development purposes, the forecast of firm FCRPS output is based upon critical (1937) water conditions. Power Loads and Resources Study section 3.1.2.1.3. FCRPS output, while uncertain, is expected to be greater than under 1937 water conditions, and thus secondary energy sales and revenue result. The forecast of surplus energy sales considers varying loads and resource, such that under some conditions, firm energy is available for sale into the wholesale market. In addition, the wholesale market price effects of a number of factors are considered in determining the forecast for surplus sales revenue.

For FY 2013, the surplus energy revenue included in the revenue forecast consists of current year actuals plus the average of the surplus energy revenues in forecast months computed during RiskMod simulations of 40 games for each of 80 historical water years, for a total of 3,200 games. For FY 2014-2015, the surplus energy revenue is the median of the surplus energy revenues across those 3,200 games. This power is assumed sold under the FPS rate schedule.

The revenue forecast for short-term market sales is computed using RiskMod to calculate monthly HLH and LLH energy surpluses for each of the 3,200 games, applying corresponding market prices developed for each game. See the Power Risk and Market Price Study, BP-14-E-BPA-04, section 2.6.3, and Risk Documentation Table 21. Revenues for FY 2013–2015 are shown in PRS Table 3, line 15, and Documentation Table 4.2, line 15.

4.1.5 Long-Term Contractual Obligations

Long-term obligation contracts include the WNP-3 Exchange Settlements, a wind energy exchange, capacity and energy exchanges, and a seasonal power exchange. For FY 2013-2015, revenue from these contractual obligations is calculated pursuant to the individual contracts and then summed and added to the forecast as a group. Note that capacity and energy exchanges, as well as the seasonal power exchange, do not generate revenue. Revenue for FY 2013-2015 is listed in Table 3, line 16, and Documentation Table 4.2, line 16.

4.1.6 Canadian Entitlement Return

The Canadian Entitlement Return is an obligation for BPA to deliver power to Canada at the border pursuant to Contract No. 99EO-40003. No revenues are generated from the delivery of this power, but energy amounts are listed in the revenue forecast to represent this system obligation. The average megawatt deliveries for FY 2013-2015 are listed in Table 3, line 17, and Documentation Table 4.2, line 17.

4.1.7 Renewable Energy Certificates (RECs)

RECs are the environmental attributes corresponding to one megawatthour of generation from a renewable energy resource. BPA sells a portion of the RECs it receives as part of its energy purchases from six wind projects. Under the previous Subscription contracts, 43 preference customers had rights to purchase RECs through FY 2016, of which about half exercised those rights to purchase RECs that total an annual average of 12.5 aMW for FY 2014-2015. The price for these RECs is set outside of the rate proceeding pursuant to the terms of the contracts. In May 2011 BPA established the REC prices as $8.00 for FY 2013, $10.25 for FY 2014, and $15.00 for FY 2015. After BPA satisfies these contract obligations, the RECs remaining in BPA's inventory for FY 2014-2015 will be distributed on a pro-rata basis to all CHWM customers based on customers' RHWMs. These RECs are distributed at no additional charge to the customers and do not generate any revenue for Power Services. Revenues for RECs in FY 2014-2015 are listed in Study Table 3, line 18, and Documentation Table 4.2, line 18.

4.1.8 Other Sales

Other sales include miscellaneous revenues from transfer customers and forecast revenues from the Slice True-Up and Load Shaping True-Up, which are applicable only for FY 2013. Other sales revenue for FY 2013-2015 is listed in Table 3, line 19, and Documentation Table 4.2, lines 19–22.

4.2 Revenue Forecast for Miscellaneous Revenues

Miscellaneous Revenues include revenues from Energy Efficiency, downstream benefits, U.S. Bureau of Reclamation (Reclamation) power for irrigation, and the Upper Baker project. Energy Efficiency revenues are received by BPA as reimbursements for costs relating to implementation of various energy efficiency projects. For FY 2013-2015, revenues from Energy Efficiency are calculated by estimating project expenses. While these revenues are wholly offset by the associated expenses, which are recorded on the expense ledger, the expenses are included in the revenue requirement; therefore, the revenues are included in this forecast.

Downstream Benefits are revenues BPA receives from utilities that benefit from the coordinated planning and operation of U.S. Army Corps of Engineers (Corps) and Reclamation upstream storage reservoirs as part of the Pacific Northwest Coordination Agreement. For FY 2013-2015, revenues from downstream benefits are calculated by applying a forecast of the operations and maintenance costs adjusted for inflation to the energy amounts from the most recent study conducted by the Northwest Power Pool (NWPP). The NWPP conducts a study each year on behalf of the utilities to calculate the energy amounts used in determining the downstream benefits.

Reclamation power for irrigation includes power that has been reserved from the FCRPS for use at Reclamation projects. For revenue forecasting purposes, power that has been reserved to Reclamation irrigation projects is classified as either "Reserved Power" or "Irrigation Pumping Power." Revenue from Reserved Power for FY 2013, 2014, and 2015 is forecast in equal monthly amounts based on an annual amount that is aggregated for Reclamation projects. The annual aggregated amounts are forecast based on historical information provided by Reclamation. Revenue from Irrigation Pumping Power for FY 2013, 2014, and 2015 is calculated using the forecast irrigation pumping load times the price set in individual contracts.

Finally, revenues from the Upper Baker project are included. Puget Sound Energy keeps 58,000 acre-feet of flood control at this reservoir, which requires it to be held at a lower level during the winter than it would be without flood control, creating head losses. On behalf of the Corps, BPA compensates Puget by delivering non-firm energy and capacity during the flood control season of November through March. In turn, BPA offsets the value of energy and capacity delivered to Puget from the yearly Treasury payment, and the deduction is listed as a revenue receipt from the Corps.

Miscellaneous revenues for FY 2013-2015 are listed in Table 3, line 21, and Documentation Table 4.2, lines 24–29.

4.3 Revenue Forecast for Generation Inputs for Ancillary, Control Area, and Other Services and Other Inter-Business Line Allocations

Power Services receives revenue from Transmission Services for providing generation inputs for ancillary and control area services. This revenue forecast includes generation inputs for Regulating Reserve, Variable Energy Resource Balancing Service (VERBS) Reserve, Dispatchable Energy Resource Balancing Service (DERBS) Reserve, and Operating Reserves. Power Services receives revenue from Transmission Services for providing generation inputs for other services, including Synchronous Condensing, Generation Dropping, Energy Imbalance, and Generation Imbalance. Other inter-business line allocations revenues include Redispatch, Segmentation of Corps and Reclamation network and delivery facilities costs, and station service. All these generation inputs are explained in the Generation Inputs Study, BP-14-E-BPA-05. Revenues are listed in Study Table 3, line 22, and Documentation Table 4.2, lines 30-52.

4.4 Revenue from Treasury Credits

Revenues are also forecast from two kinds of Treasury credits, or deductions made from BPA's annual Treasury payment. These credits represent a partial reimbursement by the Treasury for expenses incurred by BPA throughout the year.

4.4.1 Section 4(h)(10)(C) Credits

Section 4(h)(10)(C) of the Northwest Power Act states that the amounts BPA spends for protecting, enhancing, and mitigating fish and wildlife in the region shall be allocated among the FCRPS hydro projects based on the various project purposes. BPA pays the entirety of the costs relating to the obligations of section 4(h)(10)(C) and is reimbursed by the U.S. Treasury for 22.3 percent of the replacement power purchases BPA is expected to make due to fish mitigation, as well as an equal percentage of program and capital expenses related to the fish and wildlife programs. The 22.3 percent represents the non-power portion of the total FCRPS costs that is the responsibility of taxpayers rather than BPA ratepayers. This credit is treated as Power Services revenue.

Program and capital expenses relating to the fish and wildlife programs are discussed in the Power Revenue Requirement Study. The methodology for estimating the replacement power purchases resulting from changes in hydro system operations to benefit fish and wildlife is described in section

3.3.1 of the Power Loads and Resources Study. The cost of the increased purchases is estimated using RiskMod and the market price forecast and is included in the Power Risk and Market Price Study section 2.6.1 and Risk Documentation Table 16. Revenue from 4(h)(10)(C) credits is listed in PRS Table 3, line 23, and Documentation Table 4.2, line 53.

4.4.2 Colville Settlement Credits

The Colville Settlement Act Credits are discussed in section 1.2.3 of the Power Revenue Requirement Study. The Colville Settlement Agreement obligates BPA to make annual payments to the Colville Tribes. BPA receives annual credits from the U.S. Treasury against payments due the U.S. Treasury to defray a portion of the costs of making payments to the Colville Tribes. The Treasury credit for the Colville Settlement in FY 2014 and FY 2015 is set by legislation at $4.6 million per year. Public Law No. 103-436; 108 Stat. 4577, as amended. The credit is listed in PRS Table 3, line 24, and Documentation Table 4.2, line 54.

4.5 Power Purchase Expense Forecast

Power Services forecasts three types of power purchase expenses: Augmentation Purchases, Balancing Purchases, and Other Power Purchases. Although most expenses, including some power purchase expenses, such as long-term generating resources, are forecast in the Power Revenue Requirement Study, the power purchase expenses described here are directly related to load, resource, and price assumptions used in the rate case. Therefore, they are included in the Power Services revenue forecast.

4.5.1 Augmentation Purchase Expense

For planning purposes, the forecast of firm FCRPS output is based upon critical (1937) water conditions. See Power Loads and Resources Study section 3.1.2.1.3. The forecast annual firm FCRPS output under critical water plus the output of other Federal resources may not be adequate to meet annual average firm loads. Therefore, system augmentation is added to Federal resources to balance firm annual resources with firm annual loads. The Power Loads and Resources Study projects the need to acquire system augmentation of 95 aMW in FY 2014 and 404 aMW in FY 2015 to meet firm loads. Augmentation is documented in Power Load and Resources Study section 4.2.

The forecast expense for the augmentation is based on projected prices using the AURORAxmp model assuming critical water conditions. See Power Risk and Market Price Study Documentation Table 16. Augmentation purchase amounts for FY 2013-2015 are listed in PRS Table 3, line 26, and Documentation, Table 4.2, line 56.

4.5.2 Balancing Power Purchases

Balancing power purchases are calculated by RiskMod, which finds any monthly HLH and LLH energy deficits by simulations of 40 games in each of the 80 water years, for a total of 3,200 games, and applying the corresponding market prices developed for each game. Similar to the treatment of short-term market sales, the median value for balancing purchases over the 3,200 games is reported for FY 2013 for forecast months and added to actual purchases in past months, and the median value is reported for FY 2014-2015. Total balancing purchase expense for FY 2013-2015 is listed in PRS Table 3, line 27, and Documentation Table 4.2, line 57. A full description is available in the Power Risk and Market Price Study section 2.6.3 and Power Risk and Market Price Study Documentation Table 22.

4.5.3 Other Power Purchases

The majority of other power purchases are committed winter hedging purchases BPA has made to cover forecast HLH energy deficits during winter months. In those months and water years in which firm loads exceed resources, these winter hedging purchases reduce balancing purchases. Conversely, in those months and water years where resources are sufficient to serve firm loads, these winter hedging purchases increase the amount of surplus sales. RiskMod accounts for the energy relating to winter hedging purchases in the balancing purchases category. However, the amount of expense is included separately.

The cost of Tier 2 power is also included in other power purchases, as are other miscellaneous contracts. Total other power purchase expense for FY 2013-2015 is listed in Table 3, line 28, and Documentation Table 4.2, line 58.

4.6 Summary Table of Power Revenues

A detailed table of power revenues is available in Study Tables 2 and 3 and in Documentation Tables 4.1 and 4.2.

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5. RATE SCHEDULES

The power rate schedules establish the applicability of each rate schedule to products that BPA offers, the rates for the products, the billing determinants to which the rates are applied, and references to sections of the General Rate Schedule Provisions (GRSPs) that apply to each rate schedule. The Power rate schedules described in this section are presented in their entirety in BP-14-E-BPA-09.

5.1 Priority Firm Power Rate, PF-14

The PF-14 rate schedule is available for the contract purchase of Firm Requirements Power pursuant to section 5(b) of the Northwest Power Act. Utilities participating in the Residential Exchange Program under section 5(c) of the Northwest Power Act may purchase PF Power pursuant to a Residential Purchase and Sale Agreement or Residential Exchange Program Settlement Implementation Agreement.

5.1.1 Firm Requirements Power under a CHWM Contract

Rates for firm requirements purchases under a CHWM contract include Tier 1 rates, Tier 2 rates, Resource Support Services rates, and the Unanticipated Load rate. The Tier 1 rates are comprised of the three Customer charge rates (Composite, Non-Slice, Slice), Demand rates, and Load Shaping rates. Tier 2 rates include the Short-Term, Load Growth, and Vintage 2014 rates. Resource Support Services rates are provided for Diurnal Flattening Service, Resource Shaping, and Secondary Crediting Service. Unanticipated Load rates are applicable to requests for firm requirements service to unanticipated load.

5.1.2 Firm Requirements Power under a Contract other than a CHWM Contract (the Melded Rate Option)

Rates for firm requirements purchases under other than a CHWM contract include the PF Melded rate and the Unanticipated Load rate. The PF Melded rate includes energy and demand rates.

5.1.3 PF Exchange Rate

The PF Exchange rates apply to sales under a Residential Purchase and Sale Agreement or Residential Exchange Program Settlement Implementation Agreement. A utility-specific PF Exchange rate is calculated for each utility purchasing Residential Exchange Program power.

5.2 New Resources Firm Power Rate, NR-14

The NR-14 rate is applicable to sales to investor-owned utilities under Northwest Power Act section 5(b) requirements contracts. The NR-14 rate is also applicable to sales to any public body, cooperative, or Federal agency to the extent such power is used to serve any new large single load, as defined by the Northwest Power Act. The NR-14 rate includes energy, load shaping, and demand rates. The NR-14 rate schedule also includes the Unanticipated Load rate.

5.3 Industrial Firm Power Rate, IP-14

The IP-14 rate schedule is available for firm power sales to DSIs, as defined by the Northwest Power Act, pursuant to section 5(d). The IP-14 rate includes energy and demand rates. DSIs purchasing power pursuant to the IP-14 rate schedule are required to provide the Minimum DSI Operating Reserve – Supplemental.

5.4 Firm Power Products and Services Rate, FPS-14

The FPS-14 rate schedule is available for the purchase of Firm Power, Capacity Without Energy, Supplemental Control Area Services, Shaping Services, Reservation and Rights to Change Services, Reassignment or Remarketing of Surplus Transmission Capacity, Transmission Scheduling Service/Transmission Curtailment Management Service, Forced Outage Reserve Service, Resource Remarketing Service, and Unanticipated Load Service under the Resource Replacement rate. Rates and billing determinants for the products and services sold under the FPS rate schedule are either specified by BPA or mutually agreed by BPA and the customer.

5.5 General Transfer Service Agreement Rate, GTA-14

The GTA-14 rate schedule includes the GTA Delivery Charge and the Transfer Service Operating Reserve Charge applicable to customers served by low-voltage facilities under a general transfer agreement.

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6. GENERAL RATE SCHEDULE PROVISIONS

The GRSPs describe the adjustments, charges, and special rate provisions applicable to the various rate schedules. The GRSPs also define the power products and services BPA offers and define other applicable terms. This section includes brief descriptions of provisions that are not described elsewhere in the Study. The GRSPs described in this section are presented in their entirety in BP-14-E-BPA-09.

6.1 Supplemental Direct Assignment Guidelines

The Supplemental Direct Assignment Guidelines address how BPA will recover the costs for facility expansions and upgrades on third-party transmission systems for transfer service customers. The Supplemental Direct Assignment Guidelines, in conjunction with the Transmission Services Guidelines for Direct Assignment Facilities, as described in the Transmission Services Business Practices, are used to determine whether and in what way specific facility or expansion costs should be assigned to particular transfer service customers. See GRSP I.E.

6.2 Conservation Surcharge

Section 7(h) of the Northwest Power Act states that BPA may apply to rates a surcharge recommended by the Northwest Power and Conservation Council pursuant to section 4(f)(2) of the Northwest Power Act. BPA does not currently anticipate applying such a surcharge in the FY 2014-2015 rate period. See GRSP II.A.

6.3 Cost Contributions

Section 7(j) of the Northwest Power Act states that BPA's rate schedules must indicate the approximate cost contribution of different resource categories to BPA's rates for the sale of energy and capacity. The rate schedule also must indicate the cost of resources BPA acquires to meet load growth and the relation of such cost to BPA's average resource cost. See GRSP II.B.

6.4 Cost Recovery Adjustment Clause (CRAC)

The CRAC is a mechanism that results in an upward rate adjustment to respond to the financial risks BPA faces before BPA has another chance to set rates in a section 7(i) rate proceeding. If stated conditions are met, the CRAC will trigger, and a rate increase will go into effect beginning on October 1 of the applicable year. See GRSP II.C and Power Risk and Market Price Study section 3.2.3.

6.5 Dividend Distribution Clause (DDC)

The DDC is a mechanism that results in a downward rate adjustment to return accumulated net revenues to customers when BPA's cash reserves exceed a pre-defined level. If stated conditions are met, the DDC will trigger, and a rate decrease will go into effect beginning on October 1 of the applicable year. See GRSP II.E and Power Risk and Market Price Study section 3.2.5.

6.6 DSI Reserves Adjustment

In the event that BPA agrees to acquire an additional reserve product from a DSI, this adjustment (1) establishes the mechanism through which BPA compensates the DSI; and (2) places a cap on the unit price of any reserve product to be purchased to ensure that the reserve acquisition is cost effective. See GRSP II.F.

6.7 Flexible New Resource Firm Power Rate Option

The Flexible NR rate option, offered at BPA's discretion, allows NR-14 rates and billing determinants to be modified to accommodate a customer's request to change the way power is charged under the NR-14 rate schedule. The GRSP describes the factors that will be considered in such modifications. See GRSP II.H.

6.8 Flexible Priority Firm Power Rate Option

The Flexible PF rate option, offered at BPA's discretion, allows PF-14 rates and billing determinants to be modified to accommodate a customer's request to change the way power is charged under the PF-14 rate schedule. The GRSP describes the factors that will be considered in such modifications. See GRSP II.I.

6.9 The NFB Mechanisms

There are two NFB mechanisms, which allow BPA to recover additional revenue if financial impacts from a specified set of circumstances in the fish and wildlife arena cause a reduction in Power Services' forecast net revenue. The first mechanism, the NFB Adjustment, could result in an increase in the maximum revenue recoverable under a CRAC. The second mechanism, the Emergency NFB Surcharge, could result in a rate increase within the fiscal year. See GRSP II.N and Power Risk and Market Price Study section 4.2.

6.10 Priority Firm Power (PF) Shaping Option

If requested, BPA will, to the maximum extent practicable while ensuring timely BPA cost recovery, accommodate individual customer requests to reshape charges within each year of the rate period to mitigate adverse cash flow effects on the customer. Such reshaping of charges must recover the same number of dollars on a net present value basis within the fiscal year as would have been recovered without the reshaping. The reshaping of the payments will be agreed upon between BPA and the customer prior to the start of the rate period. See GRSP II.P.

6.11 Remarketing

Remarketing covers the remarketing of committed Tier 2 purchases in excess of need and for specified resources to which DFS applies that are temporarily in excess of need. The excess is created when commitments to purchase are made prior to establishing need in the RHWM Process. See GRSP II.R.

6.12 REP 7(b)(3) Surcharge Adjustment

The Residential Exchange Program 7(b)(3) surcharge is a utility-specific addition to one of the Base PF Exchange rates that recovers each REP participant's allocated share of rate protection provided pursuant to section 7(b)(2) of the Northwest Power Act. Each REP participant's initial 7(b)(3) surcharge is determined in a section 7(i) rate proceeding based on a Base PF Exchange rate and the Average System Cost (ASC) and forecast exchange loads of all utilities assumed in ratemaking to participate in the Residential Exchange Program. Each REP participant's initial 7(b)(3) surcharge is displayed in section 6.1 of the PF-14 rate schedule. Each 7(b)(3) surcharge is subject to change during the rate period if any participant's ASC changes during the rate period due to the addition or removal of a resource from a participant's resource portfolio or the planned addition of a new large single load in the service territory of the participant. The procedures for modifying the 7(b)(3) surcharges of all REP participants are codified in GRSP II.T.

6.13 TOCA Adjustment

For each customer purchasing Firm Requirements Power under a CHWM contract, a TOCA for each year of the rate period is calculated in the BP-14 7(i) process. A customer's TOCA for a fiscal year may be adjusted to account for a significant change in the customer's total load, as detailed in GRSP II.Y, for a mid-year change to a customer's annual net requirement, or for a change in a customer's Provisional CHWM.

6.14 Unanticipated Load Service

Unanticipated Load Service (ULS) applies to any request for Firm Requirements Power received after February 1, 2013, that results in an unanticipated increase in a customer's load placed on BPA during the FY 2014-2015 rate period. Contractual obligations that result from a request for service under section 9(i) of the Northwest Power Act also will be considered ULS. ULS also may apply to a customer that adds load through retail access, including load that was once served by the customer and returns from under retail access. See GRSP II.Z.

6.15 Unauthorized Increase Charges

The Unauthorized Increase (UAI) charge is a penalty charge to customers taking more power from BPA than they are contractually entitled to take. The UAI demand charge is 1.25 times the applicable monthly demand rate. The UAI energy charge is the greater of 150 mills/kWh or 2.0 times the highest hourly Powerdex Mid-C Index price for firm power for the month. See GRSP II.AA.

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7. SLICE TRUE-UP

7.1 Slice True-Up Adjustment

Slice customers are subject to an annual Slice True-Up Adjustment for expenses, revenue credits, and adjustments allocated to the Composite cost pool and to the Slice cost pool. The annual Slice True-Up Adjustment will be calculated for each fiscal year as soon as BPA's audited actual financial data are available (usually in November). See TRM section 2.7.

7.2 Composite Cost Pool True-Up

The Composite Cost Pool True-Up refers to the calculation of the annual Slice True-Up Adjustment for the Composite cost pool for each fiscal year. For each Slice customer, the annual Slice True-Up Adjustment Charge for the Composite cost pool will be calculated by:

(1) subtracting:

 (i) the forecast annual expenses, revenue credits, and adjustments allocated to the Composite Cost Pool for the applicable fiscal year of the rate period from

 (ii) the actual expenses, revenue credits, and adjustments in the applicable fiscal year of the rate period that are allocable to the Composite cost pool;

(2) dividing the difference determined in (1) above by the sum of the actual Composite cost pool TOCAs for that fiscal year (TOCAs are determined in accordance with TRM section 5.1.1 based on the Annual Net Requirement for Slice customers and computed consistent with the Load Shaping True-Up methodology set forth in TRM section 5.2.4.1 for Load Following customers); and

(3) multiplying the quotient determined in (2) above by each Slice customer's Slice Percentage for the applicable fiscal year.

As part of the Composite Cost Pool True-Up, the Firm Surplus and Secondary Adjustment from Unused RHWM will be revised to reflect the adjusted TOCAs for each fiscal year as described in section 1.2 and the resulting revenue difference between a sale at the posted Composite Customer rate and at the rate case-determined value of Unused RHWM. For each Slice customer, the dollar amount calculated from the above formula, which may be positive or negative, constitutes its Slice True-Up Adjustment Charge for the Composite cost pool. GRSP II.W contains a description of the Composite Cost Pool True-Up and the calculation of the Actual Firm Surplus and Secondary Adjustment from Unused RHWM. Table G of the GRSPs, the Composite Cost Pool True-Up Table, contains the forecast expenses, revenue credits, and adjustments that are the basis for the Composite Cost Pool True-Up calculation when compared to actual expenses, revenue credits, and adjustments.

The following sections discuss the treatment of certain expenses, revenue credits, and adjustments included in the Composite Cost Pool True-Up.

7.2.1 System Augmentation Expenses

System augmentation expenses are included in the FY 2014-2015 Composite cost pool. Part of these augmentation expenses is a cost for service to non-Slice customers' Above-RHWM load that is served at Load Shaping rates. For a description of these system augmentation expenses, see section 3.1.3.3.

System augmentation expenses will not be subject to the Composite Cost Pool True-Up. However, implicit in the Composite Cost Pool True-Up of the firm surplus and secondary adjustment for Unused RHWM, and implicit in the Composite Cost Pool True-Up for the DSI revenue credit, are adjustments that reflect the effects of additional power purchases (or lack thereof) or additional power sales to the market. See sections 3.1.3.2 and 7.2.4 for descriptions of the treatment of the firm surplus and secondary adjustment for unused RHWM and the DSI revenue credit for Composite Cost Pool True-Up purposes.

BPA's purchases of output from the Klondike III resource is a Tier 1 augmentation expense, and the Composite cost pool includes the cost of Resource Support Services and Resource Shaping Charges to shape the generation output of Klondike III into a flat annual block of power. Because the RSS and RSC charges financially convert the variable output of Klondike III to a firm annual block of power, the augmentation expense and RSS and RSC costs associated with generation output from the Klondike III resource will not be subject to the Composite Cost Pool True-Up.

7.2.2 Balancing Augmentation Adjustment

The Balancing Augmentation Adjustment can result in a positive or negative credit to the Composite cost pool. See section 3.1.3.3 for a description of the Balancing Augmentation Adjustment, the circumstances that would result in a credit, and the circumstances that would result in a negative credit. The Balancing Augmentation Adjustment will not be subject to the Composite Cost Pool True-Up.

7.2.3 Firm Surplus and Secondary Adjustment from Unused RHWM

The Firm Surplus and Secondary Adjustment from Unused RHWM will be subject to the Composite Cost Pool True-Up. The methodology specified in GRSP II.W.1.a is used to calculate the actual firm surplus and secondary adjustment from Unused RHWM for purposes of the Composite Cost Pool True-Up. The actual Firm Surplus and Secondary Adjustment from Unused RHWM will be calculated by starting with the rate case forecast for the firm surplus and secondary adjustment and adding dollar amounts to reflect the change in the sum of actual TOCAs from the sum of forecast TOCAs. The calculation of the actual firm surplus and secondary adjustment reflects the fact that when the sum of actual TOCAs is greater than the sum of forecast TOCAs, additional power is sold to customers at the Composite Customer rate, and it is assumed that additional costs are incurred in the form of forgone market sales or increased power purchases.

The calculation of the actual firm surplus and secondary adjustment reflects the fact that when the sum of actual TOCAs is less than the sum of forecast TOCAs, less power is sold to customers at the Composite Customer rate, and it is assumed that more power is sold in the market or fewer power purchase costs are incurred.

7.2.4 DSI Revenue Credit

The forecast costs associated with service to the DSIs are included in the Composite cost pool. See TRM section 3.2.1.3. DSI revenues received by BPA are included in the Composite cost pool as credits. The DSI revenue credit is subject to the Composite Cost Pool True-Up.

For purposes of the Composite Cost Pool True-Up, an actual DSI revenue credit will be calculated. For details on how the actual DSI revenue credit will be calculated, see GRSP II.W.1.(b).

The calculation of the actual DSI revenue credit starts with the forecast DSI revenue credit, which then is adjusted to calculate the actual DSI revenue credit. When the actual DSI sales are greater than the rate case forecast DSI sales, it is assumed that additional power is sold to the DSIs at the IP rate, and additional costs are incurred in the form of forgone market sales or increased power purchases. The adjustment to the forecast DSI revenue credit reflects the revenues from the additional power sold to the DSIs and the additional costs that are incurred.

When the actual DSI sales are less than the rate case forecast DSI sales, it is assumed that less power is sold to DSIs at the IP rate and more power is sold in the market, or it is assumed that such power may be used to meet BPA obligations so that fewer power purchase costs are incurred. The adjustment to the forecast DSI revenue credit will reflect these effects. The adjustment will also include any DSI take-or-pay revenues recorded by BPA, if applicable.

7.2.5 Unspent Green Energy Premium Revenues

For the Initial Proposal, there is no unspent GEP revenue that is forecast to remain at the end of FY 2013, and thus a contra-expense is not included in the Composite Cost Pool True-Up. If conditions change and BPA expects there will be unspent GEP revenue at the end of FY 2013, then the Final Proposal will include a forecast amount of that balance, and a contra-expense will be included in the Composite Cost Pool True-Up similar to the contra-expense described in the BP-12 rate proceeding. BP-12 Power Rates Study, BP-12-FS-BPA-01, section 7.3.5.

7.2.6 Interest Earned on the Bonneville Fund

TRM section 2.5 states that future circumstances may occur that make it reasonable and fair to make additional adjustments to the size of the base amount of financial reserves attributed to the Power function as of October 1, 2001. The base amount ($495.6 million) is the amount on which an interest credit is calculated for ratemaking purposes for crediting to the Composite cost pool.

BPA has made several adjustments to the reserve amount for this rate case. Table 4 displays these circumstances and the related adjustments to the size of the base amount of reserves ($495.6 million). The revised reserve amount is $570.26 million.

The amounts contained in Table 4 have not been shared with or collected from Slice customers through a prior Slice True-Up, so these amounts will be adjustments to the size of the base amount of financial reserves. The payments or funds that BPA receives are reflected as negative amounts in Table 4 and will increase the size of the base amount of financial reserves. If BPA makes payments for settlements or judgments, those payments will be reflected as positive amounts in Table 4 and will decrease the size of the base amount of financial reserves.

To the extent that BPA receives payments or makes payments during the FY 2014-2015 rate period and the payments can be categorized into one of the types of receipts or payments described in the TRM, and those receipts or payments have not been proportionally allocated to Slice customers through their Slice True-Up Adjustment Charges during the rate period, then BPA will make an adjustment to the size of the base amount of financial reserves.

The interest credit on the financial reserves amount will be subject to the Composite Cost Pool True-Up. The actual interest credit calculated on the base amount of financial reserves can change from forecast interest credit due to changes in interest credit calculation factors from forecast factors. See Revenue Requirement Study Documentation, BP-14-E-BPA-02A, section 5, for a description of how the interest credit calculation factors can change.

7.2.7 Bad Debt Expenses

Bad debt expenses could be allocated between the Composite cost pool and the Non-Slice cost pool. TRM Table 2A. There is no forecast bad debt expense for the FY 2014-2015 period for ratesetting purposes. If a bad debt expense is identified and accounted for in BPA's actual audited financial reports for a given fiscal year, there would be a determination of whether the expense would be included in the actual expenses and revenue credits that are allocable to the Composite cost pool in the applicable fiscal year of the rate period. If so, then the expense may be included for purposes of the Composite Cost Pool True-Up, and the bad debt expense would be allocated according to the principle of cost causation. TRM section 2.1.

Any bad debt expense associated with a sale to any customer that purchased Federal power exclusively at the FPS-12 and FPS-14 rates would be excluded for Composite Cost Pool True-Up purposes. Bad debt expenses associated with sales of power at only these FPS rates are related solely to BPA's sales of surplus power after the inception of the Slice product and not to sales of requirements power. The expenses and revenues from such sales are included in the Non-Slice cost pool. See TRM section 2.2.3.

Any bad debt expense associated with a sale to a customer that purchases power at only the PF or IP rate will be included for purposes of the Composite Cost Pool True-Up. The allocation to the Composite cost pool of any bad debt expense associated with a sale to a customer that purchases power at both the PF rate and the FPS rate, or a sale to a customer that purchases power at both the IP rate and the FPS rate, will be entirely contingent on the facts and circumstances of the particular instance of a full or partial non-payment of a power bill. BPA will not determine a particular cost treatment in the absence of specific information on the transaction. There have been no bad debt allocations at issue since BPA's decision to include any bad debt expenses arising from mixed transactions in the Slice True-Up Adjustment Charge calculation. BPA will defer any determination of allocation to the Composite cost pool until an instance of bad debt expenses arises.

Revenue recoveries of bad debt expenses will be included for Composite Cost Pool True-Up purposes if Slice customers paid for the bad debt expense through their Slice True-Up Adjustment Charge.

7.2.8 Settlement or Judgment Amounts

BPA payments or receipts of money related to settlements and judgments will be allocated on a case-by-case basis to either the Composite cost pool or the Non-Slice cost pool. If an amount (payment or receipt) is accounted for in BPA's actual audited financial reports for any given fiscal year (which is after rates are set), there will be a determination of whether it will be included or excluded for Composite Cost Pool True-Up purposes. Such a determination will be made based on the principle of cost causation. See TRM section 2.1.

7.2.9 Transmission Costs for Designated BPA System Obligations

Transmission and Ancillary Services expenses are allocated between the Composite cost pool and the Non-Slice cost pool. See TRM Table 2A.

The Transmission and Ancillary Services expenses associated with Designated BPA System Obligations are allocated to the Composite cost pool. Such Transmission and Ancillary Services expenses will not be subject to the Composite Cost Pool True-Up.

Transmission reservations are set aside for non-discretionary obligations (*i.e.*, Designated BPA System Obligations). Since Power Services does not know the actual amounts of transmission usage until the preschedule period for such obligations, the transmission reservations for those obligations are purchased based on the maximum need for the year. Therefore, it is appropriate to include the forecast cost of the reservations for Designated BPA System Obligations in the Composite Cost Pool, and such costs will not be subject to the Composite Cost Pool True-Up.

Any revenues from the resale of transmission that appear to be the result of BPA sales of unused transmission inventory associated with set-aside transmission will be excluded for Composite Cost Pool True-Up purposes. Such revenues will be excluded from the Composite Cost Pool True-Up to be consistent with the principle of no Composite Cost Pool True-Up of transmission expenses for Designated BPA System Obligations. Since the cost of additional transmission purchased (or of using non-Slice transmission inventory) to serve Designated BPA System Obligations in excess of what was forecast in the rate case will not be included in the Composite Cost Pool True-Up, such principle requires that revenues from sales of surplus transmission inventory also be excluded from the Composite Cost Pool True-Up.

7.2.10 Transmission Loss Adjustment

A transmission loss adjustment is included in the Composite cost pool. Without such an adjustment, Slice customers would pay not only for real power losses (through loss return schedules to BPA) on the transmission of their Slice purchase, but also a proportionate share of losses on the transmission of non-Slice products. See section 3.1.3.1 for an explanation of the calculation of this credit.

The transmission loss adjustment will not be subject to the Composite Cost Pool True-Up.

7.2.11 Resource Support Services Revenue Credit

A credit for RSS revenue will be included in the Composite cost pool. The credit is for revenues earned by uses of capacity to support resources that receive RSS. See section 3.1.2.1. This revenue credit is not subject to the Composite Cost Pool True-Up.

7.2.12 Tier 2 Rate Adjustments

Tier 2 rate adjustments are ratesetting adjustments to the Composite cost pool to reflect a share of expenses that are incurred by Power Services allocable to all power sold. See section 3.1.4. There are three types of rate adjustments: the Tier 2 overhead cost adder, the Tier 2 risk adder, and the Tier 2 transmission scheduling service cost adder.

The Tier 2 overhead cost adder is an adjustment for administrative costs incurred by Power Services. See section 3.1.7.1. The Tier 2 overhead cost adder will be included in the Composite cost pool. This adjustment will be estimated for ratesetting purposes and is not subject to the Composite Cost Pool True-Up.

The Tier 2 risk adder is an adjustment for any risks associated with costs of resources that Power Services acquires for service to Tier 2 load. This adjustment is zero for the FY 2014-2015 rate period because no risk mitigation treatment is necessary. See section 3.1.7.4. This adjustment will not be subject to the Composite Cost Pool True-Up.

The Tier 2 Transmission Scheduling Service cost adder is an adjustment for administrative costs incurred by Power Services. For a description of this adjustment, see section 3.1.7.2. The forecast of this adjustment is included in the RSS revenue credit. This adjustment will not be subject to the Composite Cost Pool True-Up.

7.2.13 Residential Exchange Program Expense

Forecast REP benefits are included in the Composite cost pool for ratesetting purposes. The forecast of REP expense on the Composite Cost Pool True-Up Table is equal to the forecast of REP benefits expected to be paid to REP participants. The forecast REP expense is subject to the Composite Cost Pool True-Up.

7.2.14 Non-Treaty Storage Agreement (NTSA) Annual Financial Settlements

NTSA is an agreement between BPA and B.C. Hydro that allows water transactions to be financially settled between BPA and B.C. Hydro. The NTSA provides two mechanisms to settle the transaction benefits, which BPA designates as a system obligation: energy deliveries during the year or a financial settlement based on the August 31 balance at the end of the year. Financial settlements in a fiscal year and the financial accrual amount recorded for the month of September in a fiscal year are charged or credited to power purchases, and Slice customers pay their share of the charge or receive their share of the credit through the Composite Cost Pool True-Up Table.

7.2.15 Acquisition Costs of *inc* Balancing Reserve Capacity

If possible, BPA may make acquisition of *inc* balancing reserve capacity when the FCRPS system is unable to provide the 900 megawatt planned amount of *inc* balancing reserve capacity. If such purchases are made, these costs are type 2 acquisition costs. See Generation Inputs Study, BP-14-E-BPA-05, section 3.5.1. The portions of these acquisition costs that are allocated to non-AGC (automatic generation control) hydro resources and Federal thermal resources are recovered from Power Services. Therefore, these acquisition costs will affect power customers through power services financial reserves and the Slice True-Up. These costs are not forecast in the Initial Proposal because BPA does not know how much the cost will be. When costs are known, Slice customers will pay their share of the costs through the Composite Cost Pool True-Up Table. See Generation Inputs Study, BP-14-E-BPA-05, section 3.5.2.

7.3 Slice Cost Pool True-Up

The Slice Cost Pool True-Up refers to the calculation of the annual Slice True-Up Adjustment for the Slice Cost Pool, which is described in TRM section 2.72. The Slice cost pool is shown in GRSP II.W, Table H. Slice expenses and credits are forecast to be zero in FY 2014-2015. If there are any actual Slice expenses and credits incurred during the rate period, such expenses and credits will be subject to the Slice Cost Pool True-Up.

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8. AVERAGE SYSTEM COSTS

8.1 Overview of Average System Cost and the Residential Exchange Program

The REP is described in section 2.1.2. One of the components of the REP is the participating utilities' Average System Costs (ASC), which are determined in a separate ASC Review Process that BPA conducts pursuant to the substantive and procedural requirements of the 2008 ASC Methodology (ASCM). *See* 2008 ASCM, 18 C.F.R. § 301, *et seq*. The 2008 ASCM is an administrative rule that governs BPA's calculation of ASCs. The Federal Energy Regulatory Commission granted final approval to the 2008 ASCM on September 4, 2009.

As introduced in section 1.2.2., BPA is implementing the 2012 REP Settlement in this proposal. The Settlement establishes a fixed stream of REP benefits that are payable to the IOUs for the period beginning in FY 2012 and ending in FY 2028. Individual IOU REP benefit determinations under the Settlement will continue as under the traditional REP. BPA will compare the IOUs' respective ASCs with their PF Exchange rates and, if the difference is positive, multiply the difference by the IOUs' exchange loads. Thus, IOUs' ASCs and exchange loads for FY 2014-2015 are needed to determine the REP benefits provided to individual IOU participants consistent with the Settlement. Similarly, for the two COUs participating in the REP, BPA will compare their respective ASCs with their PF Exchange rates and, if the difference is positive, multiply the difference by their exchange loads. The COU REP benefits are in addition to the fixed stream of IOU REP benefits under the Settlement.

8.2 Overview of ASC Determinations

An ASC is calculated by dividing a utility's allowable resource costs (Contract System Cost) by the utility's allowable load (Contract System Load). The quotient is the utility's ASC ($/MWh). Contract System Cost is the sum of the utility's allowable generation- and transmission-related costs and overheads. Contract System Load is the sum of the total retail sales of a utility, as measured at the meter, plus distribution losses, less any NLSLs, if applicable.

The ASCs used in the BP-14 Initial Proposal were determined in Draft ASC Reports published on November 14, 2012. These Draft ASC Reports reflect the utilities' ASCs for the BP-14 rate period. Draft ASC Reports were issued for eight utilities: Avista Utilities, Idaho Power Company, NorthWestern Energy, PacifiCorp, Portland General Electric, Puget Sound Energy, Clark County PUD, and Snohomish County PUD.

Under the 2008 ASCM, the actual ASC for each utility may change if the utility adds a new resource, retires an existing resource, or adds an NLSL. The revised ASC takes effect in the month after a new resource comes on line, an existing resource is retired, or a new NLSL begins taking service.

Under the 2012 REP Settlement, participating IOUs agreed to refrain from filing for ASC revisions based upon new resources coming on line or being retired during the Exchange Period (the Exchange Period is identical to the rate period). Under the REP Settlement, the ASCs that are effective on the first day of the rate period would persist throughout the Exchange Period. Therefore, "day-one" ASCs have been developed for use in establishing rates under the REP Settlement.

Three utilities have new resources that are scheduled to begin operation prior to the start of the Exchange Period. The day-one ASCs used for the BP-14 Initial Proposal assume that these new resources are operating prior to the start of the Exchange Period. If they fail to do so, then the actual ASCs and individual utility benefits will differ from the BP-14 values. If there is a change to any ASC used in setting rates, all utility-specific 7(b)(3) surcharges for all REP participants will be recomputed using GRSP II.T. The day-one ASCs are shown in Documentation Table 2.1.3.

8.3 BP-14 Residential and Small Farm Exchange Loads

REP exchange loads are defined as a utility's qualifying residential and small farm consumer loads as determined in accordance with the utility's Residential Purchase and Sales Agreement or Residential Exchange Program Settlement Implementation Agreement.

Residential Load is determined in the BP-14 ratemaking process pursuant to the terms of the Settlement and published in GRSP II.S. Under the 2012 REP Settlement, participating IOUs agreed to use a two-year historical average for determining the exchange load used to calculate REP benefits, referred to as Residential Load. For the BP-14 rate period, the historical years are CY 2011 and CY 2012. For the Initial Proposal, actual CY 2011 and CY 2012 Residential and Small Farm loads are used to calculate the monthly Residential Loads for January through September. Monthly Residential Loads for October, November, and December are the same Residential Loads BPA is using for the FY 2012-2013 rate period. These loads will be updated to the actual CY 2011 and CY 2012 loads for the Final Proposal.

For the COUs, the FY 2014-2015 exchange load forecasts are based on the exchange load information provided by the COUs in the ASC Review Processes. Each COU's exchange load forecast is adjusted for the COU's Tier 1 percentage, as required by the TRM. The Tier 1 percentage is defined as BPA's forecast percentage of the COU's load that is expected to be served by purchases of power at Tier 1 rates from BPA and from the COU's Existing Resources for CHWM. COU REP benefits will be paid on actual residential and small farm sales as adjusted by the Tier 1 percentage for each COU, as submitted after the conclusion of each month during the rate period.

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Power Rates Study Tables

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Table 1: Rate Period High Water Marks for FY 2014-2015

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
1)	Albion, City of	0.400
2)	Alder Mutual Light Company	0.55
3)	Ashland, City of	21.157
4)	Asotin County PUD	0.604
5)	Bandon, City of	7.671
6)	Benton County PUD	202.424
7)	Benton Rural Electric Association	67.011
8)	Big Bend Electric Cooperative, Inc.	61.449
9)	Blachly-Lane Electric Cooperative	17.69
10)	Blaine, City of	8.783
11)	Bonners Ferry, City of	5.342
12)	Burley, City of	14.123
13)	Canby Utility	20.394
14)	Cascade Locks, City of	2.61
15)	Central Electric Cooperative, Inc.	82.192
16)	Central Lincoln People’s Utility District	157.326
17)	Centralia, City of	24.473
18)	Cheney, City of	15.883
19)	Chewelah, City of	2.856

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
20)	Clallam County PUD No. 1	76.345
21)	Clark Public Utilities	319.822
22)	Clatskanie People’s Utility District	93.968
23)	Clearwater Power Company	24.263
24)	Columbia Basin Electric Cooperative, Inc.	12.169
25)	Columbia Power Cooperative Association	3.248
26)	Columbia River People’s Utility District	60.605
27)	Columbia Rural Electric Cooperative, Inc.	37.85
28)	Consolidated Irrigation District #19	0.229
29)	Consumers Power, Inc.	45.864
30)	Coos-Curry Electric Cooperative, Inc.	41.046
31)	Coulee Dam, Town of	2.033
32)	Cowlitz County PUD	551.489
33)	Declo, City of	0.36
34)	DOE National Energy Technology Laboratory	0.460
35)	DOE Richland	28.494
36)	Douglas Electric Cooperative, Inc.	19.087
37)	Drain, City of	2.453
38)	East End Mutual Electric Co., Ltd.	2.698
39)	Eatonville, Town of	3.382
40)	Ellensburg, City of	24.082

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
41)	Elmhurst Mutual Power & Light Company	32.372
42)	Emerald People's Utility District	52.664
43)	Energy Northwest	2.879
44)	Eugene Water and Electric Board	252.144
45)	Fairchild Air Force Base	7.324
46)	Fall River Rural Electric Cooperative, Inc.	33.268
47)	Farmers Electric Company	0.51
48)	Ferry County PUD No. 1	11.714
49)	Flathead Electric Cooperative, Inc.	167.518
50)	Forest Grove, City of	26.986
51)	Franklin County PUD No. 1	117.841
52)	Glacier Electric Cooperative, Inc.	21.406
53)	Grant County PUD No. 2 – Grand Coulee	5.213
54)	Grays Harbor County PUD No. 1	131.764
55)	Harney Electric Cooperative, Inc.	22.847
56)	Hermiston, City of	12.991
57)	Heyburn, City of	4.837
58)	Hood River Electric Cooperative	13.153
59)	Idaho County Light & Power Coop.	6.239
60)	Idaho Falls Power	79.888
61)	Inland Power & Light Company	108.191

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
62)	Jefferson County PUD No. 1	45.361
63)	Kittitas County PUD No. 1	9.743
64)	Klickitat County PUD	36.812
65)	Kootenai Electric Cooperative, Inc.	51.212
66)	Lakeview Light & Power	33.481
67)	Lane Electric Cooperative, Inc.	29.224
68)	Lewis County PUD No. 1	114.207
69)	Lincoln Electric Cooperative, Inc.	14.632
70)	Lost River Electric Cooperative, Inc.	9.566
71)	Lower Valley Energy	86.396
72)	Mason County PUD No. 1	9.024
73)	Mason County PUD No. 3	80.262
74)	McCleary, City of	4.191
75)	McMinnville Water and Light	104.659
76)	Midstate Electric Cooperative, Inc.	46.941
77)	Milton-Freewater, City of	10.585
78)	Milton, City of	7.468
79)	Minidoka, City of	0.119
80)	Mission Valley Power	38.11
81)	Missoula Electric Cooperative, Inc.	27.098
82)	Modern Electric Water Company	26.394

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
83)	Monmouth, City of	8.398
84)	Nespelem Valley Electric Cooperative, Inc.	5.906
85)	Northern Lights, Inc.	36.078
86)	Northern Wasco County PUD	65.035
87)	Ohop Mutual Light Company	10.201
88)	Okanogan County Electric Coop, Inc.	6.556
89)	Okanogan County PUD No. 1	49.152
90)	Orcas Power and Light Cooperative	24.837
91)	Oregon Trail Electric Consumers Cooperative, Inc.	81.614
92)	Pacific County PUD No. 2	36.479
93)	Parkland Light and Water Company	14.127
94)	Pend Oreille County PUD No. 1	29.132
95)	Peninsula Light Company, Inc.	72.285
96)	Plummer, City of	3.962
97)	Port Angeles, City of	85.836
98)	Port of Seattle	17.35
99)	Raft River Rural Electric Cooperative, Inc.	38.224
100)	Ravalli County Electric Cooperative, Inc.	18.592
101)	Richland, City of	101.564
102)	Riverside Electric Company	2.382
103)	Rupert, City of	9.462

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
104)	Salem Electric	39.553
105)	Salmon River Electric Cooperative	31.52
106)	Seattle City Light	526.096
107)	Skamania County PUD No. 1	15.973
108)	Snohomish County PUD No. 1	802.401
109)	Soda Springs, City of	3.07
110)	South Side Electric, Inc.	6.793
111)	Springfield Utility Board	101.126
112)	Steilacoom, Town of	4.828
113)	Sumas, City of	3.658
114)	Surprise Valley Electric Corp.	16.5
115)	Tacoma Public Utilities	404.068
116)	Tanner Electric Cooperative	11.078
117)	Tillamook People's Utility District	56.263
118)	Troy, City of	2.046
119)	U.S. Dept of the Navy – Bremerton	30.587
120)	U.S. Dept of the Navy – Everett	1.534
121)	U.S. Dept. of the Navy – Bangor	20.506
122)	Umatilla Electric Cooperative	113.695
123)	Umpqua Indian Utility Cooperative	4.131
124)	United Electric Cooperative, Inc.	30.102

Table of RHWMs for FY 2014–FY 2015		
A	**B**	**C**
	Preference Customer	**RHWM aMW**
126)	Vera Water & Power	27.27
127)	Vigilante Electric Cooperative, Inc.	19.232
128)	Wahkiakum County PUD No. 1	5.026
129)	Wasco Electric Cooperative, Inc.	13.452
130)	Weiser, City of	6.355
131)	Wells Rural Electric Company	96.171
132)	West Oregon Electric Cooperative, Inc.	8.642
133)	Whatcom County PUD No. 1	26.945
134)	Yakama Power	9.963
	Total	7115.875

Table 2: Revenues at Current Rates

	B C D E	F	G	H	I	J	K
1	**Revenues at Current Rates**	**2013**	**2013**	**2014**	**2014**	**2015**	**2015**
2	**Category**	**$ (000's)**	**aMW**	**$ (000's)**	**aMW**	**$ (000's)**	**aMW**
3	Composite Revenue	$2,276,003	6,959	$2,307,680	7,010	$2,316,746	7,037
4	Non-Slice Revenue	($327,962)	-	($334,463)	-	($336,268)	-
5	Slice	$0	-	$0	-	$0	-
6	Load Shaping Revenue	($32,944)	-	($30,199)	-	($32,451)	-
7	Demand Revenue	$24,123	54	$7,097	17	$33,304	79
8	Irrigation Rate Discount	($2,934)	6	($13,944)	14	$10,658	20
9	Low Density Discount	$60,262	-	$59,590	-	$60,192	-
10	Tier 2	($19,305)	-	($19,305)	-	($19,305)	-
11	RSS (Non-Federal)	$317	-	$309	-	$317	-
12	PF customers (CHWM) sub-total	$1,977,561	7,018	$1,976,765	7,042	$2,033,193	7,137
13	DSIs sub-total	$101,772	320	$99,244	312	$99,244	312
14	FPS sub-total	$2,738	9	$2,997	8	$3,074	9
15	Short-term market sales sub-total	$371,769	1,861	$329,284	1,697	$341,136	1,684
16	Long Term Contractual Obligations sub-total	$33,793	62	$29,865	59	$29,865	74
17	Canadian Entitlement Return	$0	505	$0	500	$0	475
18	Renewable Energy Certificates sub-total	$1,070	16	$1,061	14	$1,107	11
19	Other Sales sub-total	($4,689)	-	$2,215	-	$2,230	-
20	**Gross Sales**	**$2,484,015**	**9,791**	**$2,441,432**	**9,632**	**$2,509,849**	**9,702**
21	**Miscellaneous Revenues**	**$27,181**	**178**	**$32,597**	**178**	**$32,621**	**178**
22	**Generation Inputs / Inter-business line**	**$138,442**	**9**	**$127,305**	**9**	**$133,234**	**9**
23	4(h)(10)(c)	$81,399	-	$95,302	-	$92,383	-
24	Colville and Spokane Settlements	$4,600	-	$4,600	-	$4,600	-
25	**Treasury Credits**	**$85,999**	-	**$99,902**	-	**$96,983**	-
26	**Augmentation Power Purchase total**	**$0**	**-**	**$27,611**	**95**	**$123,273**	**404**
27	**Balancing Power Purchase sub-total**	**$50,409**	**199**	**$31,941**	**170**	**$27,492**	**144**
28	**Other Power Purchase total**	**$66,251**	**139**	**$42,140**	**69**	**$33,304**	**-**
29	**Power Purchases**	**$116,660**	**338**	**$101,693**	**334**	**$184,068**	**548**

Table 3: Revenues at Proposed Rates

	B	C	D	E	F	G	H	I	J	K
1	**Revenues at Proposed Rates**				**2013**		**2014**		**2015**	
2	**Category**				**$ (000's)**	**aMW**	**$ (000's)**	**aMW**	**$ (000's)**	**aMW**
3			Composite Revenue		$2,276,003	6,959	$2,325,015	7,010	$2,334,149	7,037
4			Non-Slice Revenue		($327,962)	-	($261,487)	-	($262,899)	-
5			Slice		$0	-	$0	-	$0	-
6			Load Shaping Revenue		($32,944)	-	($36,119)	-	($37,257)	-
7			Demand Revenue		$24,123	54	$5,414	17	$27,391	79
8			Irrigation Rate Discount		($2,934)	6	$5,888	14	$26,150	20
9			Low Density Discount		$60,262	-	$60,932	-	$61,568	-
10			Tier 2		($19,305)	-	($19,794)	-	($19,794)	-
11			RSS (Non-Federal)		$317	-	$352	-	$612	-
12		PF customers (CHWM) sub-total			$1,977,561	7,018	$2,080,201	7,042	$2,129,920	7,137
13		DSIs sub-total			$101,772	320	$106,537	312	$106,537	312
14		FPS sub-total			$2,738	9	$2,997	8	$3,074	9
15		Short-term market sales sub-total			$371,769	1,861	$329,284	1,697	$341,136	1,684
16		Long Term Contractual Obligations sub-total			$33,793	62	$29,865	59	$29,865	74
17		Canadian Entitlement Return			$0	505	$0	500	$0	475
18		Renewable Energy Certificates sub-total			$1,070	16	$1,061	14	$1,107	11
19		Other Sales sub-total			($4,689)	-	$2,215	-	$2,230	-
20	**Gross Sales**				**$2,484,015**	**9,791**	**$2,552,160**	**9,632**	**$2,613,870**	**9,702**
21	**Miscellaneous Revenues**				**$27,181**	**178**	**$27,674**	**178**	**$27,923**	**178**
22	**Generation Inputs / Inter-business line**				**$138,442**	**9**	**$123,007**	**9**	**$128,444**	**9**
23		4(h)(10)(c)			$81,399	-	$95,302	-	$92,383	-
24		Colville and Spokane Settlements			$4,600	-	$4,600	-	$4,600	-
25	**Treasury Credits**				**$85,999**	-	**$99,902**	-	**$96,983**	-
26		**Augmentation Power Purchase sub-total**			**$0**	**-**	**$27,611**	**95**	**$123,273**	**404**
27		**Balancing Power Purchase sub-total**			**$50,409**	**199**	**$31,941**	**170**	**$27,492**	**144**
28		**Other Power Purchase sub-total**			**$66,251**	**139**	**$40,250**	**69**	**$26,442**	**-**
29	**Power Purchases**				**$116,660**	**338**	**$99,803**	**334**	**$177,206**	**548**

Table 4: Adjustments to Financial Reserves Base Amount

	A	B	C	D	E	F
1	**Unit**	**Account**	**Stat Amt**	**Ref**	**Line Descr**	**Reason for adjustment**
2	POWER	999044	$ (673,094.63)	AR00114197	Receipt from DOJ	1
3	POWER	999044	$ (104,552.35)	AR00117261	Receipt from FERC	1
4	POWER	999044	$ (53,497.33)	AR00119524	Receipt from DOJ	1
5	POWER	999044	$ (2,789.38)	AR00122086	Receipt from DOJ	1
6	POWER	999044	$ (5.04)	AR00129431	Stock dividend	2
7	POWER	999044	$ (6,667.74)	AR00127956	Receipt from FERC	1
8	POWER	999044	$ (1,528.11)	AR00128358	Receipt from DOJ	1
9	POWER	999044	$ (1,080.25)	AR00143938	Receipt from DOJ	1
10	POWER	999044	$ (2,700.63)	AR00152218	Receipt from DOJ	1
11	POWER	999044	$ (43,791.87)	AR00153347	Receipt from FERC	1
12	POWER	999044	$ (5.04)	AR00144929	Stock dividend	2
13	POWER	999044	$ (5.04)	AR00147994	Stock dividend	2
14	POWER	999044	$ (5.04)	AR00151401	Stock dividend	2
15	POWER	999044	$ (5.04)	AR00156308	Stock dividend	2
16	POWER	999044	$ (5.04)	AR00158673	Stock dividend	2
17	POWER	999044	$ (73,765,314.86)		CAL ISO/PX Receipt	1
18						
19		Total:	**$ (74,655,047.39)**			

21 **Reasons for adjustments**

22 1) BPA’s receipt of payments for settlements or judgments pertaining to power marketing transactions that occurred before FY 2002,

23 2) BPA’s receipt of funds as collections of outstanding receivables relating to revenues that occurred before FY 2002,

24 3) BPA's payment for settlements or judgments pertaining to power marketing transactions that occurred before FY 2002.

26 **Base amount of financial reserves = $ 495,600,000**

28 **Adjustment to the base amount of financial reserves = $495,600,000 + $74,655,047**

30 **Resulting amount of financial reserves = $ 570,255,047**

32 Adjustment amounts, if negative, are added to the base amount of financial reserves, thereby increasing the size of the base amount.

33 Adjustment amounts, if positive, are subtracted from the base amount of financial reserves, thereby decreasing the size of the base amount.

Appendix A

7(c)(2) Industrial Margin Study

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Appendix A

7(c)(2) Industrial Margin Study

1. INTRODUCTION

The purpose of this Appendix is to describe BPA's calculation of the "typical margin" included by the Administrator's public body and cooperative customers in their retail industrial rates. The resulting margin is added to the PF-14 energy rates, which become the energy rates used in the IP-14 rate for BPA's direct-service industry (DSI) customers.

Section 7(c)(1)(B) of the Northwest Power Act provides that rates applicable to BPA's DSI customers shall be set "at a level which the Administrator determines to be equitable in relation to the retail rates charged by the public body and cooperative customers to their industrial consumers in the region." Section 7(c)(2) provides that this determination shall be based on "the Administrator's applicable wholesale rates to such public body and cooperative customers and the typical margins included by such public body and cooperative customers in their retail industrial rates." This section further provides that the Administrator shall take into account:

(1) the comparative size and character of the loads served;

(2) the relative costs of electric capacity, energy, transmission, and related delivery facilities provided and other service provisions; and

(3) direct and indirect overhead costs, all as related to the delivery of power to industrial customers.

2. METHODOLOGY

2.1 "Administrator's Applicable Wholesale Rates to Public Body and Cooperative Customers"

The Administrator's applicable wholesale rates to public body and cooperative customers are the PF-14 demand and energy rates before any 7(b)(2) or floor rate adjustments are applied.

2.2 "Typical Margin"

The typical margin is based generally on the overhead costs that consumer-owned utilities add to the cost of power in setting their retail industrial rates; see section 2.3 below.

2.3 Margin Determination Factors

7(c)(2)(A) – Comparative Size and Character of the Loads Served. The data base used for the study includes utilities that serve at least one industrial consumer with a peak demand of at least 3.5 MW.

7(c)(2)(B) – Relative Costs of Electric Capacity, Energy, Transmission, and Related Delivery Facilities Provided and Other Service Provisions. The utility margins in this study are based to the extent possible on utility cost of service analyses and incorporate costs allocated to the industrial consumer class. The utilities segregate these costs into various cost categories, and only those categories considered to be appropriate margin costs are included in the industrial margin calculation.

In the past, BPA has accounted for "other service provisions" through a character of service adjustment for service to the first quartile of DSI load, which was interruptible as defined in the

DSIs' power sales contract. Because the DSI contracts no longer include these provisions, this adjustment is not included in this study.

7(c)(2)(C) – Direct and Indirect Overhead Costs. Cost of service studies and other spreadsheets prepared by the public body and cooperative customers provide information to calculate the per-unit overhead costs associated with service to large industrial consumers.

3. APPLICATION OF THE METHODOLOGY

The derivation of the margin involves three steps. First, an individual margin is determined for each utility in the study. Second, each margin is weighted according to energy sales to derive an overall weighted average margin. Third, the BPA DSI delivery facilities charge is added to replace the distribution costs that otherwise may be included in the margin.

3.1 Data Base

The data was collected in 2011 from qualifying utilities by the Public Power Council (PPC) under the terms of a confidentiality agreement. Under the terms of that agreement, the names of the individual utilities and their industrial consumers were deleted from the data base, and the names were not publicly disclosed. Furthermore, all parties wishing to evaluate the utility margin data at the PPC offices were required to sign confidentiality agreements. All utility data reported has been identified by a randomly assigned number. The data base consists of cost information from 33 utilities that have at least one industrial consumer with a peak load of at least 3.5 MW. Attachment A displays each participating utility's individual data.

3.2 Utility Margins

The individual utility margins are based on costs allocated by the utilities to their industrial consumers. The categories of costs include production, transmission, distribution, taxes, and other overhead costs. Derivation of the margin involves three steps. First, an individual margin is determined for each utility in the study. Second, each margin is weighted according to energy sales to derive an overall weighted average margin. Third, the BPA DSI delivery facilities charge is added to replace the distribution costs that otherwise may be included in the margin.

3.3 Summary of Results

The final results of each step in the industrial margin calculation for each utility are shown on the Summary Table in Attachment A. These results were used in the BP-12 rate case. The weighted industrial margin based on this margin study for the BP-12 rate case was 0.685 mills/kWh.

4. THE INDUSTRIAL MARGIN FOR THE BP-14 RATE CASE

BPA did not conduct a new industrial margin survey for the BP-14 rate case. Because such a brief period had passed since the last margin survey (about 18 months), and a concern that PPC might find it burdensome to undertake a significant involvement in another margin survey in early 2012, BPA contacted PPC (representing public power) and Alcoa (a DSI customer) about the possibility of reaching an agreement to waive conducting the industrial margin survey in the BP-14 rate case. This led to a Memorandum of Understanding among PPC, Alcoa, and BPA to waive the industrial margin survey in this rate case. See Attachment B.

The BP-14 industrial margin is calculated by adding an inflation factor to the BP-12 rate case industrial margin, using two years' increase in the GDP Implicit Price Deflator. Accordingly, the BP-12 industrial margin, 0.685 mills/kWh, is multiplied by 1.035. The BP-14 industrial margin is 0.709 mills/kWh.

Attachment A

2012 Industrial Margin Study

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Summary - 2012 Margin Study Results

Utility Code Number	Test Period Energy (KWh)	Total Cost	Production	Transmission	Distribution	Other	Taxes	Weighted Margin
1	51,410,428					$ 5.67		0.017
2	1,581,923,558					$ 0.04		0.004
3	95,688,000	$ 47.66	$ 36.62	$ -	$ 9.38	$ 0.45	$ 1.21	0.002
5	42,823,202	$ 57.46	$ 36.78	$ 0.85	$ 18.61	$ 0.42	$ 0.80	0.001
6	29,114,880	$ 43.02	$ 34.50	$ 2.36	$ 2.87	$ 0.72	$ 2.57	0.001
7	40,694,000					$ -		0.000
8	405,668,000					$ -		0.000
9	361,407,000	$ 4.78	$ 3.84	$ 0.01	$ 0.72	$ 0.07	$ 0.13	0.002
11	467,121,000	$ 45.11	$ 32.63	$ 5.45	$ 3.18	$ 0.81	$ 3.04	0.022
12	248,035,470	$ 36.22	$ 34.20	$ 0.25	$ 1.36	$ 0.00	$ 0.38	0.000
13	119,932,734	$ 38.94	$ 36.80	$ -	$ 0.04	$ 0.01	$ 2.09	0.000
14	61,910,899	$ 10.77	$ -	$ 0.47	$ 9.79	$ 0.51	$ -	0.002
15	966,012,620					$ 0.02		0.001
16	169,040,000					$ 0.47		0.005
17	352,800,436	$ 41.45	$ 30.46	$ 0.23	$ 10.69	$ 0.06	$ -	0.001
18	5,390,158,000	$ 49.42	$ 40.45	$ 0.90	$ 6.60	$ 0.88	$ 0.58	0.273
20	297,405,000					$ 0.15		0.003
21	340,000,000					$ 0.43		0.008
23	78,758,000	$ 43.69	$ 33.49	$ 0.12	$ 8.23	$ 1.11	$ 0.74	0.005
24	203,423,478	$ 62.26	$ 33.19	$ 4.05	$ 22.70	$ 0.10	$ 2.22	0.001
25	152,608,000	$ 40.67	$ 31.32	$ 0.77	$ 4.29	$ 3.40	$ 0.89	0.030
26	47,700,000	$ 46.82	$ 34.17	$ 0.85	$ 10.86	$ 0.32	$ 0.62	0.001
27	15,897,484					$ 0.32		0.000
28	3,022,602,000					$ 0.54		0.093
29	718,303,000					$ 0.35		0.015
30	808,561,000	$ 51.24	$ 47.77	$ 0.14	$ 0.30	$ 0.04	$ 2.99	0.002
31	223,878,000	$ 36.86	$ 29.79	$ -	$ 5.86	$ 0.71	$ 0.49	0.009
32	750,395,000	$ 54.12	$ 44.55	$ 2.13	$ 0.15	$ 4.19	$ 3.10	0.180
33	194,837,000	$ 46.71	$ 39.37	$ -	$ 4.53	$ 0.01	$ 2.81	0.000
34	21,884,198					$ 5.29		0.007
35	94,165,000	$ 26.69	$ 7.06	$ 0.66	$ 15.48	$ 0.03	$ 3.47	0.000
36	19,516,800					$ 0.03		0.000
37	38,909,777					$ 0.01		0.000
Total:	**17,412,583,964**							**0.685**

Utility Number: # 1

Two industrial customers; rates set through contract.

Customer 1: BPA rate plus $1.09/MWh; 2009 sales (kWh)	=		**31,485,920**
Margin	=		**$ 34,320**
Customer 2: BPA rate plus $21,430/mo; 2009 sales	=		**19,924,508**
Margin	=		**$ 257,160**
Total margin from Customers 1 & 2	=	**$ 291,480**	
Sales to Customers 1 & 2 (kWh)	=	**51,410,428**	

Utility Number: # 2

Large Industrial includes sales under Schedules 14, 15, & 16

	Ave # of customers	**Load (kWh)**	**Monthly basic charge**
Schedule 14	3	123,852,000	$ 200
Schedule 15	6	1,223,870,998	$ 500
Schedule 16	10	234,200,560	$ 200
		1,581,923,558	
		Total basic charges/year =	**$ 67,200**

Utility Number: # 3							
	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ 3,503,816	$ 3,503,816					$ 3,503,816
Transmission:	$ -						
Distribution:	$ 66,980			$ 66,980			$ 66,980
Customer Accounts:	$ 20,315				$ 20,315		$ 20,315
Customer Services:	$ 4,599				$ 4,599		$ 4,599
Admin & Genl:	$ 68,093			$ 49,632	$ 18,461		$ 68,093
Taxes:	$ 115,384					$ 115,384	$ 115,384
Depreciation:	$ 779,001			$ 779,001			$ 779,001
Interest:	$ 2,352			$ 2,352			$ 2,352
TOTAL	$ 4,560,540	$ 3,503,816		$ 897,965	$ 43,375	$ 115,384	$ 4,560,540

Utility Number: # 5

	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ 1,574,999	$ 1,574,999					$ 1,574,999
Transmission:	$ 14,196		$ 14,196				$ 14,196
Distribution:	$ 310,053			$ 310,053			$ 310,053
Customer Accounts:	$ 7,316				$ 7,316		$ 7,316
Meter Reading:	$ 194			$ 194.00			$ 194
Customer Service:	$ 3,456				$ 3,456		$ 3,456
Sales Exp:	$ 2,549				$ 2,549		$ 2,549
Admin & Genl (1):	$ 120,230		$ 5,056	$ 110,429	$ 4,744		$ 120,230
Depreciation:	$ 232,235		$ 10,168	$ 222,067			$ 232,235
Taxes:	$ 34,108					$ 34,108	$ 34,108
Interest:	$ 159,676		$ 6,991	$ 152,685			$ 159,676
Other:	$ 1,731		$ 76	$ 1,655			$ 1,731
TOTAL	$ 2,460,743	$ 1,574,999	$ 36,486	$ 797,084	$ 18,065	$ 34,108	$ 2,460,743

Utility Number: # 6

	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 1,035,622	$ 1,035,622					$ 1,035,622
Transmission:	$ 712		$ 712	$ -			$ 712
Distribution:	$ 59,107			$ 59,107			$ 59,107
Meter Reading:	$ 18			$ 18			$ 18
Customer Records & Collection:	$ 54			$ 54			$ 54
Misc Customer Service:	$ 87				$ 87		$ 87
A & G:	$ 41,855		$ 497	$ 41,297	$ 61		$ 41,855
Taxes:	$ 74,851					$ 74,851	$ 74,851
Inrerest:	$ 46,721		$ 555	$ 46,166			$ 46,721
Capital Projects:	$ 88,598		$ 67,619		$ 20,979		$ 88,598
Other Deduction (2):	$ (63,872)		$ (758)	$ (63,021)	$ (93)		$ (63,872)
BPA Conservation, Con Aug, other:	$ (31,231)	$ (31,231)					$ (31,231)
TOTAL	$ 1,252,522	$ 1,004,391	$ 68,625	$ 83,621	$ 21,034	$ 74,851	$ 1,252,522

Utility Number: # 7
One industrial customer with a monthly peak of at least 3.5 MW; 2009 load = 40,694 MWh
Monthly Base Charge = $0.00
Demand Charge = $5.75/kW
Energy Charge = $0.0316/kWh

Utility Number: # 8
One industrial customer with a monthly peak of at least 3.5 MW; 2009 load = 405,668 MWh
Monthly Base Charge = $0.00
Industrial rates set by city ordinance

Utility Number: # 9							
	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Power Costs:	$ 1,387,888	$ 1,387,888					$ 1,387,888
Transmission:	$ 1,320		$ 1,320				$ 1,320
Distribution:	$ 71,299			$ 71,299			$ 71,299
Customer Accounts:	$ 263				$ 263		$ 263
Public Relations & Info:	$ 11,873				$ 11,873		$ 11,873
Energy Services:	$ 3,159				$ 3,159		$ 3,159
Admin & Genl:	$ 63,036		$ 946	$ 51,079	$ 11,011		$ 63,036
Depreciation:	$ 75,872		$ 1,379	$ 74,493			$ 75,872
Taxes:	$ 48,396					$ 48,396	$ 48,396
Interest:	$ 65,238		$ 1,186	$ 64,052			$ 65,238
TOTAL	$ 1,728,344	$ 1,387,888	$ 4,831	$ 260,923	$ 26,306	$ 48,396	$ 1,728,344

Utility Number: # 11							
	Two Industrial Customers	Production	Transmission	Distribution	Other	Taxes	Sum
Power:	$ 15,244,327	$ 15,244,327					$ 15,244,327
Transmission:	$ 2,544,405		$ 2,544,405				$ 2,544,405
Distribution:	$ 1,481,945			$ 1,481,945			$ 1,481,945
Meter Reading + Cust Records:	$ 5,366			$ 5,366			$ 5,366
Customer Education:	$ 77,324				$ 77,324		$ 77,324
Low Income Assist.:	$ 156,540				$ 156,540		$ 156,540
Electirc Marketing:	$ 142,594				$ 142,594		$ 142,594
Taxes:	$ 1,419,465					$ 1,419,465	$ 1,419,465
TOTAL	$ 21,071,966	$ 15,244,327	$ 2,544,405	$ 1,487,311	$ 376,458	$ 1,419,465	$ 21,071,966

Utility Number: # 12	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Generation:	$ 644,417	$ 644,417					$ 644,417
Purchased Power:	$ 8,379,469	$ 8,379,469					$ 8,379,469
Transmission:	$ 77,781		$ 77,781				$ 77,781
Distribution:	$ 412,110			$ 412,110			$ 412,110
Meter Reading + Customer Records:	$ 9,303			$ 9,303			$ 9,303
Customer Service:	$ 3,113				$ 3,113		$ 3,113
Admin & Genl:	$ 496,109	$ 278,795	$ 33,651	$ 182,317	$ 1,347		$ 496,109
Taxes:	$ 95,106					$ 95,106	$ 95,106
Interest:	$ 341,788	$ 192,595	$ 23,246	$ 125,947			$ 341,788
Capital Projects:	$ 455,818	$ 256,850	$ 31,002	$ 167,966			$ 455,818
Other Revenue:	$ (1,931,751)	$ (1,270,440)	$ (103,488)	$ (560,694)	$ (4,142)		$ (1,938,764)
TOTAL	$ 8,983,263	$ 8,481,687	$ 62,191	$ 336,948	$ 318	$ 95,106	$ 8,976,250

ATTACHMENT A

Utility Number: # 13							
	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 3,813,592	$ 3,813,592					$ 3,813,592
Transmission							
Distribution							
Conservation	$ 600,000	$ 600,000					$ 600,000
Meters & Services	$ 4,742			$ 4,742			$ 4,742
Accounting	$ 536				$ 536		$ 536
Customer Related	$ 789				$ 789		$ 789
Revenue Related	$ 250,374					$ 250,374	$ 250,374
TOTAL	$ 4,670,033	$ 4,413,592		$ 4,742	$ 1,325	$ 250,374	$ 4,670,033

Utility Number # 14

	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ -						
Transmission:	$ 29,120		$ 29,120				$ 29,120
Distribution:	$ 560,614			$ 560,614			$ 560,614
Metering & Billing:	$ 45,398			$ 45,398			$ 45,398
Customer Services:	$ 31,565				$ 31,565		$ 31,565
TOTAL	$ 666,697		$ 29,120	$ 606,012	$ 31,565		$ 666,697

Utility Number: # 15

7 customers in High Voltage General rate class; load = 966,012,620 kWh

Customer Charge per meter per month = **$ 210**

Total customer charges per year = **$ 17,640**

Utility Number: # 16

1 large industrial customer with peak of at least 3.5 aMW

Total Insustrial sales in 2009 = 169,040 MWh

Fixed charge (equivalent to customer charge of $6,557/month; annual cost =	$	78,684

Utility Number: # 17

	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 10,747,941	$ 10,747,941					$ 10,747,941
Transmission:	$ 15,940		$ 15,940				$ 15,940
Distribution:	$ 735,733			$ 735,733			$ 735,733
Customer Accnts:	$ 4,917				$ 4,917		$ 4,917
Customer Svcs:	$ 1,963				$ 1,963		$ 1,963
Interest on Debt (2):	$ 398,427		$ 8,449	$ 389,978			$ 398,427
Depreciation (2):	$ 551,528		$ 11,696	$ 539,832			$ 551,528
Additional revenue req.:	$ 2,165,398		$ 45,621	$ 2,105,704	$ 14,073		$ 2,165,398
TOTAL	$ 14,621,847	$ 10,747,941	$ 81,706	$ 3,771,247	$ 20,953		$ 14,621,847

ATTACHMENT A

Utility Number: # 18	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Generation:	$ 45,179,704	$ 45,179,704					$ 45,179,704
Purchased Power:	$ 182,460,007	$ 182,460,007					$ 182,460,007
Conservation:	$ 26,968,662	$ 26,968,662					$ 26,968,662
Transmission:	$ 9,881,306		$ 9,881,306				$ 9,881,306
Distribution:	$ 72,213,558			$ 72,213,558			$ 72,213,558
Customer costs:	$ 4,980,734				$ 4,980,734		$ 4,980,734
Low income assistance:	$ 4,680,598				$ 4,680,598		$ 4,680,598
Franchise Adjustments:	$ 3,136,376					$ 3,136,376	$ 3,136,376
Revenue Credits:	$ (83,124,365)	$ (36,590,117)	$ (5,011,314)	$ (36,623,179)	$ (4,899,754)		$ (83,124,365)
TOTAL	$ 266,376,580	$ 218,018,256	$ 4,869,992	$ 35,590,379	$ 4,761,578	$ 3,136,376	$ 266,376,580

Utility Number: # 20

2 large industrial customers with peak of at least 3.5 aMW

Total Industrial sales in 2009 = 297,405 MWh

Margin charges = 0.0195 cents/kWh for first 19.1 aMW in a month, and 0.0098 cents for each kWh thereafter

167,316,000	kWh at 0.0195 cents
130,089,000	kWh at 0.0098 cents

Total margin charges for 2009 = **4,537,534** cents = **$ 45,375**

Utility Number: # 21

Industrial sales in 2010 = 340,000 MWh

Industrial customers in 2010 = 35

Customer cost per month in 2010 = **$349**

Total customer cost = **$146,639**

ATTACHMENT A

Utility Number: # 23							
	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 2,626,334	$ 2,626,334					$ 2,626,334
Transmission:							
Distribution:	$ 318,070			$ 318,070			$ 318,070
Customer Services & Accts:	$ 63,752			$ 9,575	$ 54,177		$ 63,752
A & G:	$ 155,355	$ 11,293		$ 130,111	$ 13,951		$ 155,355
Depreciation:	$ 141,272		$ 9,761	$ 112,513	$ 18,998		$ 141,272
Interest:	$ 77,847			$ 77,847			$ 77,847
Taxes:	$ 58,569					$ 58,569	$ 58,569
TOTAL	$3,441,199	$2,637,627	$9,761	$648,116	$87,126	$58,569	$3,441,199

Utility Number: # 24							
	(includes NLSL)	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ 6,752,558	$ 6,752,558					$ 6,752,558
Transmission:	$ 414,702		$ 414,702				$ 414,702
Distribution:	$ 2,326,532			$ 2,326,532			$ 2,326,532
Customer Related:	$ 19,242				$ 19,242		$ 19,242
A & G:	$ 448,614		$ 67,395	$ 378,092	$ 3,127		$ 448,614
Depr & Amort:	$ 939,205		$ 142,086	$ 797,119			$ 939,205
Taxes:	$ 451,195					$ 451,195	$ 451,195
Interest:	$ 1,347,794		$ 203,898	$ 1,143,896			$ 1,347,794
Capital Requirements:	$ 232,129		$ 35,117	$ 197,011			$ 232,129
Other Income:	$ (267,290)		$ (40,154)	$ (225,272)	$ (1,863)		$ (267,290)
TOTAL	$ 12,664,681	$ 6,752,558	$ 823,043	$ 4,617,379	$ 20,506	$ 451,195	$ 12,664,681

ATTACHMENT A

Utility Number: # 25							
	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 4,780,364	$ 4,780,364					$ 4,780,364
Transmission:	$ 69,374		$ 69,374				$ 69,374
Distribution:	$ 393,197			$ 393,197			$ 393,197
Customer Related:	$ 1,729				$ 1,729		$ 1,729
A & G:							
Prop ins/inj & damag:	$ 17,112			$ 17,112			$ 17,112
Cust acct/serv & info/sales rel:	$ 480,913				$ 480,913		$ 480,913
Depreciation:	$ 328,871	$ 18	$ 48,211	$ 244,836	$ 35,806		$ 328,871
Taxes:	$ 135,572					$ 135,572	$ 135,572
TOTAL	$ 6,207,132	$ 4,780,382	$ 117,585	$ 655,145	$ 518,448	$ 135,572	$ 6,207,132

ATTACHMENT A

Utility Number: # 26	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Purchased Power:	$ 1,629,832	$ 1,629,832					$ 1,629,832
Transmission:	$ 12,295		$ 12,295				$ 12,295
Distribution:	$ 150,666			$ 150,666			$ 150,666
Customer Related:							
Meter reading & cust. Records:	$ 6,440			$ 6,440			$ 6,440
Customer sales & service:	$ 7,343				$ 7,343		$ 7,343
Depreciation:	$ 129,443		$ 9,395	$ 120,048			$ 129,443
A & G + Other Expense:	$ 185,637		$ 12,914	$ 165,011	$ 7,712		$ 185,637
Taxes:	$ 29,545					$ 29,545	$ 29,545
Interest:	$ 74,929		$ 5,438	$ 69,491			$ 74,929
Other Expenses:	$ 7,009		$ 506	$ 6,200	$ 302		$ 7,008
TOTAL	$2,233,139	$1,629,832	$40,548	$517,856	$15,357	$29,545	$2,233,138

Utility Number: # 27

Utility # 27 has 1 large industrial customer; 2009 load = **15,897,484** kWh

Customer cost per month in 2010 = **$ 418.70**

Total customer cost = $ 5,024.40

Utility Number: # 28	
Utility # 28 has 3 large industrial customers; 2009 load = 3,022,602,000 kWh	
Margin charges set in contract with each customer; total margin charges in 2009 =	$1,619,690

Utility Number: # 29

1 large industrial customer; 2009 load = 718,303 MWh

Direct costs of contract administration for this customer (2 plants)	=	$	175,442
		$	79,376
		$	**254,818**

Utility Number: # 30

	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ 42,669,341	$ 42,669,341					$ 42,669,341
Transmission:	$ -		$ -				$ -
Distribution:	$ 322,009			$ 322,009			$ 322,009
Meter reading + customer records:	$ 2,429			$ 2,429			$ 2,429
Customer related:	$ 1,301				$ 1,301		$ 1,301
A & G:	$ 260,302			$ 259,262	$ 1,040		$ 260,302
Taxes:	$ 2,418,041					$ 2,418,041	$ 2,418,041
Interest:	$ 673,382			$ 673,382			$ 673,382
Capital Projects:	$ 290,096		$ 110,346	$ 145,596	$ 34,154		$ 290,096
Other Revenues:	$ (5,209,277)	$ (4,047,303)		$ (1,157,333)	$ (4,641)		$ (5,209,277)
TOTAL	$ 41,427,624	$ 38,622,038	$ 110,346	$ 245,345	$ 31,854	$ 2,418,041	$ 41,427,624

Utility Number: # 31

	Large Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production	$ 6,669,764	$ 6,669,764					$ 6,669,764
Transmission							
Fixed Oper Costs (Distn)	$ 406,590			$ 406,590			$ 406,590
on Oper Exp (Cust Svc & Acct)	$ 71,114				$ 71,114		$ 71,114
Admin & Bus Exp	$ 530,588			$ 442,017	$ 88,571		$ 530,588
Taxes	$ 110,812					$ 110,812	$ 110,812
LTGO Debt Servd & Cap	$ 462,840			$ 462,840			$ 462,840
TOTAL	$ 8,251,708	$ 6,669,764	$ -	$ 1,311,447	$ 159,685	$ 110,812	$ 8,251,708

Utility Number: # 32

	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Production:	$ 33,760,238	$ 33,760,238					$ 33,760,238
Transmission:	$ 145,001		$ 145,001				$ 145,001
Distribution:	$ 10,066			$ 10,066			$ 10,066
Customer Services & Accounts:	$ 2,171,387				$ 2,171,387		$ 2,171,387
A & G:	$ 989,157		$ 61,651	$ 4,280	$ 923,226		$ 989,157
Capital Projects:	$ 1,151,312		$ 1,076,576	$ 74,736			$ 1,151,312
Debt Service:	$ 333,697		$ 312,035	$ 21,662			$ 333,697
Direct Assignments:	$ 1,442,631		$ 89,915	$ 6,242	$ 1,346,474		$ 1,442,631
Other Revenue:	$ (1,721,861)	$ (329,663)	$ (86,749)	$ (6,022)	$ (1,299,426)		$ (1,721,860)
Taxes:	$ 2,329,920					$ 2,329,920	$ 2,329,920
TOTAL	$ 40,611,548	$ 33,430,575	$ 1,598,429	$ 110,963	$ 3,141,661	$ 2,329,920	$ 40,611,549

Utility Number: # 33	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Power:	$ 7,378,831	$ 7,378,831					$ 7,378,831
Conservation:	$ 134,032	$ 134,032					$ 134,032
Distribution:	$ 161,203			$ 161,203			$ 161,203
Customer Related:	$ 714				$ 714		$ 714
A & G:	$ 398,772	$ 180,599		$ 217,211	$ 962		$ 398,772
Broad Band:	$ 93,962	$ 42,554		$ 51,181	$ 227		$ 93,962
Interest:	$ 531,746			$ 531,746			$ 531,746
Cash Flow:	$ 495,596	$ 224,450		$ 269,950	$ 1,196		$ 495,596
Taxes:	$ 547,357					$ 547,357	$ 547,357
Other Revenue:	$ (640,934)	$ (290,272)		$ (349,116)	$ (1,546)		$ (640,934)
TOTAL	$ 9,101,279	$ 7,670,195	$ -	$ 882,175	$ 1,552	$ 547,357	$ 9,101,279

Utility Number: # 34

1 large industrial customer with peak of at least 3.5 aMW

2008 Industrial load = 21,884,198 kWh

Margin = $.00529/kWh

Total margin charges for 2008 = **$ 115,767**

Utility Number: # 35

	Total Utility	Industrial	Production	Transmission	Distribution	Other	Taxes	Sum
Power Production:	$ 2,477,820	$ 318,447	$ 318,447					$ 318,447
Transmission:	$ 428,864	$ 55,117		$ 55,117				$ 55,117
Distribution:	$ 4,226,132	$ 543,138			$ 543,138			$ 543,138
Metering Reading:	$ 571,769	$ 73,483			$ 73,483			$ 73,483
Credit & Billing:	$ 853,653	$ 109,711			$ 109,711			$ 109,711
Information & Advertising:	$ 52,530	$ 6,751				$ 6,751		$ 6,751
Administrative & General Expenses:	$ 4,598,604	$ 591,008	$ 170,068	$ 29,435	$ 387,900	$ 3,605		$ 591,008
Taxes:	$ 2,541,360	$ 326,613					$ 326,613	$ 326,613
Debt Service:	$ 7,940,000	$ 1,020,441	$ 295,443	$ 51,135	$ 673,863			$ 1,020,441
Capital Projects:	$ 6,280,000	$ 807,100	$ 233,675	$ 40,445	$ 532,980			$ 807,100
Total Transfers:	$ 841,720	$ 108,177	$ 31,320	$ 5,421	$ 71,436			$ 108,177
Energy Sales:	$ (9,248,760)	$ (1,188,642)	$ (342,042)	$ (59,201)	$ (780,148)	$ (7,251)		$ (1,188,642)
Other Revenues:	$ (2,006,586)	$ (257,885)	$ (41,976)	$ (60,458)	$ (155,087)	$ (363)		$ (257,884)
TOTAL	$ 19,557,106	$ 2,513,460	$ 664,935	$ 61,895	$ 1,457,276	$ 2,742	$ 326,613	$ 2,513,461

Utility Number: # 36

1 large industrial customer; 2008 load = 19,516,800 kWh

Monthly Customer Charge = **$51.37**

Total charges = **$ 616.44**

Utility Number: # 37	
1 large industrial customer; 2010 load = 38,909,777 kWh	
Customer charge =	**$208**

Attachment B
Memorandum of Understanding
Waiver of Industrial Margin Survey 2014 BPA Rate Case

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Memorandum of Understanding

between

PUBLIC POWER COUNCIL

and

ALCOA

and

BONNEVILLE POWER ADMINISTRATION (BPA)
POWER SERVICES

Subject: Wavier of Industrial Margin Survey in 2014 BPA Rate Case

The parties agree to the following:

- Because PPC, Alcoa and BPA believe it is unlikely that the costs of service of public utilities in the PNW in serving their customers have changed significantly since the industrial margin study conducted in BPA's 2012 rate case, an industrial margin survey will not be performed in the 2014 rate case.

- Neither PPC, Alcoa nor BPA will use the lack of a current industrial margin survey to impeach each other's testimony, by arguing that the other party should have performed a new industrial margin survey.

- Any methodology issues raised in the 2014 rate case regarding calculation of the industrial margin shall use data from the 2012 margin survey; these arguments shall not require performance of a new industrial margin survey.

_______________ for PPC   Date 6/11/2012

_______________ for Alcoa   Date 06-18-2012

_______________ for BPA   Date 6/6/2012

Bonneville Power Administration
DOE/BP-4436 • November 2012