SHEI CONTEXT AND OBSERVATIONS

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When is SHEI typically congested, and what does that mean?

Implications for GMP customers

Initial observations on evaluation of solutions

Primarily when generation in the area is high

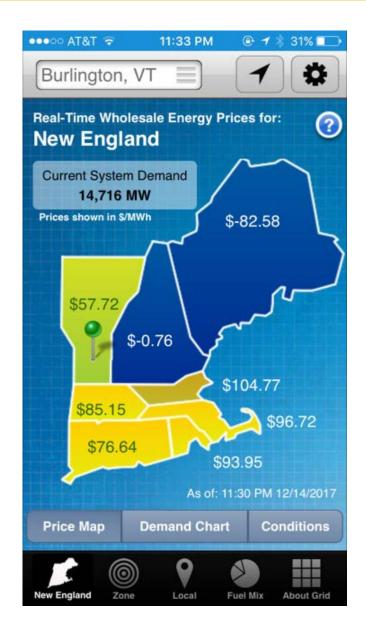
- Wind (Kingdom Community Wind, Sheffield) and hydro
- Deliveries over Highgate Converter
- This typically means winter & spring months
- And any time of year when major transmission system maintenance / outages occur
- During most hours of the year, SHEI is not congested
- Typically ~20% of the time on average, but big fluctuations (monthly, and Day Ahead vs. Real Time markets)
- Varies greatly by day/hour, and even within hours (real time)
- But typically at times when a lot of power is being produced >> significant customer value at stake

What Happens When "Congestion" Occurs?

Total amount of generation within SHEI area exceeds the interface limit

- ISO-NE monitors interface flows, if/when reductions are needed
- Some source(s) need to limit their output, so interface limit is not exceeded
- Framework governing dispatch of larger generators is known as "DNE" (Do Not Exceed)
- Intermittent generators (like Sheffield, KCW, Sheldon Springs) are included – starting late May, 2016
- Transmission constraints are now resolved based on offer prices of resources (and other factors)
- Market prices (LMP) can diverge much more strongly across interfaces
- A significant change for the regional market (not only VT/SHEI)

Congestion in ISO-NE: One Extreme Example



Increased Net Costs for GMP Customers

When SHEI is congested, three primary mechanisms:

- Reduced generation output (e.g., at KCW)
 - Lose value of energy, Renewable Energy Certificates, Production Tax Credit
 - Almost all power generated/delivered in SHEI is renewable
- Lower LMP payments to generation in SHEI
 - Affects all sources in the area, not just the one(s) being reduced
- Offsetting: lower cost to purchase load requirements
- Estimated net impact for GMP: several \$million of net cost increase, over 18 months
- Key: in the SHEI area, much more generation than load
- True for VT in total, but there are exceptions

Enough to justify meaningful effort on finding solutions

- To cost-effectively increase interface capacity >> reduce frequency & magnitude of interface congestion
- And to exercise caution re: addition of new generation in the area

Potential Solutions

A complex evaluation

- Electrical engineering; wholesale power markets
- Range of operating conditions
- VELCO/EIG study (Q4 2017) was a big step
- How much would potential solutions increase SHEI limits?
- Under different system conditions?
- Other important ingredients
 - Breadth/depth of lost generation and congestion to date
 - How representative was this recent history?
 - Some potential solutions not yet scoped/studied?

- Significant range of potential solutions
- Type, scale, complexity, permitting/time required
- Estimation of capital costs
- For some, also operating revenues/expenses
- Effectiveness of solutions in different system conditions
- How much would potential solutions increase SHEI limits?
- Under different system conditions?
- Ideally, an initial screening step
 - Solution feasibility, scale, benefit/cost, timing
 - Narrow the focus to a subset of options

Potential Solutions – Initial Themes

- Can a mix of small/mid-size options cost-effectively address today's SHEI congestion?
- Are there any solutions that should be deployed ASAP?
- Initial GMP evaluation: AVR at Sheldon Springs could be one
- Or, additional solutions that should be explored in parallel?
- Process for broad solution evaluation = TBD
- Technical/financial analysis suitable to small groups particularly with VELCO and VDUs
- But need to involve other parties/stakeholders
- Working group, with periodic briefing to PUC?

Key first step: how to cost-effectively de-congest the current system?

Current generation sources and loads

If additional generation is then added in SHEI, gains could be eroded

An ongoing dialogue will likely be needed re: proposed future generation in the area

- Likely impacts (MWh, \$\$) on existing sources (almost all renewable) in the area
- Benefits of the proposed generation to VT customers
- Future options to mitigate congestion, and who should pay