

Appendix B

Progress on Recommendation No. 2

Some limited progress was made toward the establishment of a tight power pool between Chugach Electric Association, Inc. (Chugach) and the Municipality of Anchorage d/b/a Municipal Light & Power Department (ML&P). This effort was halted in the fall of 2018, pending the outcome of the proposed acquisition of ML&P's assets by Chugach. The opportunity to realize \$10 million in annual natural gas savings from more efficient generation dispatch between the two utilities was suspended. Voluntary commercial settlement arrangements could not be reached. Additional savings were not realized by incorporating Matanuska Electric Association, Inc. into the tight pool.

It is not clear if voluntary tight pooling agreements between Chugach and ML&P are possible if the two utilities remain separate entities. The proposed acquisition of ML&P's assets by Chugach has delayed progress toward system-wide security constrained merit order dispatch of the Railbelt's electrical generation units. Appendix B details all efforts made during the past four years to achieve security constrained merit order economic dispatch.

- **August 20, 2015 – Letter from Evan J. Griffith, General Manager, and Matanuska Electric Association:** “MEA agrees that non-discriminatory access as well as open and transparent pricing are essential principles for the Railbelt. However, we believe this already exists to a large extent in the current state of the Railbelt and have not seen an analysis that indicates this really is a problem. The only concerns have been raised by the IPPs who seem to believe integration and interconnection is just a matter of adding a connection to an existing line. MEA spent considerable time and resources working with our colleagues at Chugach and ML&P to properly interconnect our EGS power plant to the larger grid. Any power producer needs to accept the same costs and responsibility to ensure their generation does not cause harm to the larger system. While economic dispatch by an independent entity is worthy of investigation, more clarity around the role and guidelines for this entity as well as an in-depth analysis of the costs should be accomplished before we move ahead on unsubstantiated claims that it may bring economic benefit to the ratepayers...I have a few concerns with language in Recommendation 2 as true merit-order economic dispatch is not feasible without realizing the investment by utilities. To not recognize such represents a taking of the assets of private entities and is likely subject to legal challenge. Also, this letter does not effectively detail who will assess the organizational and governance structure needed for an independent, consolidated system operator nor the timeline... My second concern is how the RCA or legislature/administration would develop steps to institutionalize

system-wide merit-order dispatch. The subject matter experts on this reside in the utilities. Who in the state has the knowledge to undertake such?”

- **August 28, 2015 – *Attorneys for Homer Electric Association, Inc. filed a copy of a letter with the RCA:*** The letter had been sent to the general counsels for Chugach Electric Association, Inc., Anchorage Municipal Light and Power, Matanuska Electric Association, Inc. and Golden Valley Electric Association, Inc. In that letter, attorneys for HEA gave notice that they had been retained to “evaluate the merits or certain claims arising under Alaska's Restraint of Trade Act in connection with Chugach Electric Association, Inc. (“CEA”). Golden Valley Electric Association, Inc. (“GVEA”). Matanuska Electric Association, Inc. (“MEA”), and the Municipality of Anchorage d/b/a Municipal Light & Power (“ML&P”) (collectively. the “Coordinating Utilities”). These Coordinating Utilities have exerted their influence and control over the Bradley Lake Project Management Committee (“BPMC”) in a manner that is detrimental to the public's financial and competitive interests.....The Coordinating Utilities' anticompetitive practices restrain. If not prohibit, HEA from selling its surplus power into a discernible generalized market. As a result, the customers or electric utilities are deprived of the potential benefits of such sales and pay inflated rates.... We hereby put the Coordinating Utilities on notice that, based upon our review of the law and the facts as slated below, the actions of the Coordinating Utilities violate Alaska's Restraint of Trade Act and Alaska's Unfair Trade Practices and Consumer Protection Act. A prevailing plaintiff under either statute is entitled to recover treble damages plus costs and reasonable attorneys' fees for antitrust violations.”
- **September 10, 2015 – *Letter from Cory Borgeson, Chairman of the Bradley Lake Project Management Committee:*** Advised the Commission that the Bradley Lake Project Management Committee intended to direct mediated settlement in attempting to resolve disputes with Homer Electric Association, Inc.
- **September 30, 2015 – *Letter from Bradley Evans, CEO of Chugach Electric Association, Inc.:*** In summary, Chugach remains supportive and committed to the Commission's efforts and the voluntary restructuring of the Railbelt electric grid for both the formation of a Transco for economies of scale and the formation of a USO for economic dispatch. The efforts put forth by the Railbelt electric utilities, ATC and ARCTEC are instrumental in achieving these goals. Chugach recognizes and appreciates the Commission's continued efforts in this matter.
- **November 4, 2015 – *RCA Public Meeting:*** Commissioners discussed filings received after it submitted its recommendations to the Legislature. Commissioner Pickett stated that there appeared to be very keen legislative interest in the recommendations made by

the RCA. The commissioners went on to discuss the lack of progress resulting from the voluntary efforts of Railbelt utility cooperation which have been “going on for -- not just years, but decades, ” and stated they expected “to see something substantive” in mandated reports on transmission restructuring due December 31, 2015.

- **January 29, 2016- *Homer Electric Association Inc’s First Status Report on Voluntary Power Pooling*:** HEA reported “that the use of a so-called "loose pool" concept of inter-utility energy sales and purchases, in combination with power plant efficiency improvements, has resulted in HEA realizing a significant savings in the cost of fuel in 2015. HEA and Anchorage Municipal Light and Power (ML&P) worked together such that ML&P sold electrical energy to HEA at appropriate times and prices and in sufficient quantities obviating HEA's need to operate any of its less efficient Bernice Lake units (BCT) throughout 2015, saving HEA over \$350,000 in fuel costs.... In an effort to comply with the Commission's Recommendation No.2 in the absence of data from the model, HEA is filing with the Commission the data it has compiled to date that may have a bearing on the costs and benefits of consolidating Railbelt generation dispatch in a single entity. While the Railbelt's cost of power will be reduced by virtue of the newly constructed generating units, and perhaps additionally through coordinated optimization of their outputs, the Railbelt cannot save more energy costs than it incurs. A helpful starting point for determining realistic boundaries to potential savings would be a compilation of the 2014 total costs of fuel used to produce electrical energy on the Railbelt, filed with the RCA by the Railbelt utilities.”
- **January 29, 2016 - *Matanuska Electric Association’s First Report concerning cost, benefits and other outcomes of voluntary power pooling – RCA Recommendation No. 2*:** reported on the process it uses to orchestrate loose pool economic dispatch of power from EGS. MEA reported on MEA transactions stating a “significant” number of transactions occurred between MEA and other utilities. The loose pool arrangement relies on a significant amount of utility coordination and MEA has been pleased with the level of professionalism and collaboration at the dispatch and operational level to move both fuel and energy in the most efficient manner to complete economy energy and reserves transactions.
- **January 31, 2016 - *Status Report on Efforts to Implement Economic Dispatch-Regulatory Commission of Alaska Recommendation No 2*:** This joint filing was made by Anchorage Municipal Light and Power (MLP), Alaska Railbelt Cooperative Transmission and Electric Company (ARCTEC), Chugach Electric Association (CEA), the City of Seward (Seward) and Golden Valley Electric Association (GVEA), (together the Parties) file this first update on voluntary efforts to implement economic dispatch and establish a Railbelt Unified System Operator. In the progress to date section

of the 20 page filing, there are listed two accomplishments: 1) Modeling is now underway to identify the overall savings expected to be realized through the formation of a USO. It is expected that this product will be complete in the second quarter of 2016 and will inform much of the discussions moving forward, and 2) Generation and transmission outage schedules are being coordinated voluntarily through bi-weekly meetings that take into account fuel supply and delivery activities as well.

- **February 1, 2016- *Informational Filing on Efforts Toward Pooling and Joint dispatch between Anchorage Municipal Light and Power and Chugach Electric Association:*** Chugach Electric Association, Inc. ("Chugach") and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P", together with Chugach, the "Parties" or each individually, a "Party") are pleased to report that the Parties have been engaged in discussions to develop a mutually beneficial power pooling and joint dispatch arrangement ("Anchorage Pool"). Chugach and ML&P are submitting this filing for informational purposes to make the Regulatory Commission of Alaska ("Commission" or "RCA") aware of the Parties' ongoing discussion of such a pooling arrangement, including the significant progress the Parties have made towards designing a process for the mutually-beneficial scheduling and dispatch of their electric generation and transmission facilities to reliably and economically meet the load of their retail and wholesale customers.
- **March 23, 2016 – RCA Public Meeting:** The utilities answered Commissioner questions arising from their pooling reports filed in January.
- **April 29, 2016 – *Homer Electric Association Inc. 's Second Status Report on Voluntary Power Pooling Opportunities:*** HEA reported that it continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the first quarter of 2016. HEA also set forth its methodology in orchestrating loose pool economic dispatch.
- **April 29, 2016 – *Matanuska Electric Association Inc. 's First Quarter 2016 Report concerning cost, benefits and other outcomes of voluntary power pooling – RCA Recommendation No. 2:*** MEA filed a quarterly report stating it continued to conduct economy energy purchases and sales with other utilities for cost savings. MEA notes that transactions were not curtailed due to any constraints. MEA states that "The present power pooling activity relies on a significant amount of utility coordination and MEA has been pleased with the level of professionalism and collaboration at the dispatch and operational level to seamlessly move both fuel and energy in the most efficient manner to complete economy energy and reserves transactions. MEA is continuing to strengthen its

relationships with adjoining utilities and its gas supplier, to solidify the ongoing cooperation to the benefit of all. To this end, MEA and Chugach entered into a new "Gas Dispatch Agreement" on March 31, 2016, jointly continuing our relationship in this area." MEA goes on to state that "on March 31, 2016, MEA met with Chugach and ML&P to begin discussions on a Chugach/MEA/ML&P Power Pool. Those discussions were positive and MEA is optimistic an agreement can be reached as additional discussions continue."

- **May 2, 2016 - Informational Filing on Efforts Toward Pooling and Joint dispatch between Anchorage Municipal Light and Power and Chugach Electric Association:** The joint Chugach Electric Association, Inc. ("Chugach") and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), filing stated that Chugach and ML&P are still the process of developing the details of the joint dispatch and pooling arrangements, which will provide contractual and operational framework coordinated scheduling, dispatch and settlement transactions for the exchange of energy, capacity and ancillary services... meetings between the Parties are routinely held to refine protocols and to determine equitable cost and savings allocations. Chugach and ML&P also continue to actively participate in Docket I- 15-001, and both utilities view their joint pooling discussion and development work as a complement to these Railbelt-wide efforts. Chugach and ML&P anticipate filing a contract memorializing the joint dispatch and power pooling arrangement between them for the Commission's approval. At this time, however, the Parties are not in a position to request Commission approval of their intended arrangements.
- **May 3, 2016 - Status Report on Efforts to Implement Economic Dispatch and to Establish a Railbelt System Operator:** ARCTEC, on behalf of Chugach Electric Association, Matanuska Electric Association, Golden Valley Electric Association, the City of Seward, Alaska, Anchorage Municipal Light and Power and Alaska Railbelt Cooperative Transmission and Electric Company (the "Participants"), filed Draft Bylaws of the (yet to be formed) Alaska Railbelt Unified System Operator, Inc. with a the participants planning to continue efforts to implement a "loose pool," stating that generation coordination among the Participants continues to improve.
- **May 11, 2016 – RCA Public Meeting:** The Commission provided a review of the four filings it received between April and May as well as alert the utilities the Commission planned to evaluate all voluntary efforts at a Special Public Meeting in July.
- **July 13, 2016 - Order I-15-001(3) ORDER REQUESTING RESPONSES:** "To allow us to update the Alaska State Legislature and Governor Walker on developments in the Railbelt since our recommendations were transmitted to the Legislature one year ago and

to provide an up-to-date baseline for our upcoming discussions, we request that by August 10, 2016, the Railbelt electric utilities and other interested persons file updated reports and comments, on a joint or individual basis as appropriate, detailing the status and the future plans and timetables for • the initiation of centralized economic dispatch • power pooling.”

- **July 29, 2016 - *Homer Electric Association Inc.’s Third Status Report on Voluntary Power Pooling Opportunities*:** HEA reports that it “continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the second quarter of 2016.”
- **July 29, 2016 – *Matanuska Electric Association Inc.’s Second Quarter 2016 Report concerning cost, benefits and other outcomes of voluntary power pooling – RCA Recommendation No. 2*:** MEA filed a quarterly report stating it continued to conduct economy energy purchases and sales with other utilities for cost savings. MEA notes that transactions were not curtailed due to any constraints. MEA states that “The present power pooling activity relies on a significant amount of utility coordination and MEA has been pleased with the level of professionalism and collaboration at the dispatch and operational level to seamlessly move both fuel and energy in the most efficient manner to complete economy energy and reserves transactions. MEA is continuing to strengthen its relationships with adjoining utilities and its gas supplier, to solidify the ongoing cooperation to the benefit of all. MEA increased interaction with GVEA but had minimal involvement with Chugach and ML&P regarding a Chugach/MEA/ML&P Power Pool.
- **August 1, 2016- *Chugach Electric Association Inc.’s Informational Filing on Efforts Toward Power Pooling and Joint Dispatch*:** At the Commission's July 13, 2016 Public Meeting, representatives of Chugach and ML&P made a brief presentation regarding the status of negotiations to develop a dispatch protocol and settlement process in furtherance of the completion of a power pooling agreement between the two utilities. While that process is ongoing, it is important for the Commission to understand that it is well beyond the theoretical phase. Current discussions are focused on reaching agreement on the actual terms of dispatch protocol and settlement processes
- **August 10, 2016 – *Comments for I-15-001 by Louie Flora, Alaska Center for the Environment*:** The Alaska Center Supports the statement in RCA recommendation #2 from its June 30, 2015 letter to Senate President Kevin Meyer and House Speaker Mike Chenault which reads as follows: “System-wide merit order economic dispatch of the Railbelt's electrical generation units will bring the maximum benefit to ratepayers. The Commission should use all the regulatory and statutory authority it currently has to

strongly promote economic dispatch, and seek new statutory authority as needed to promote this goal.” Based on this statement, it appears that existing RCA statute may suffice to move the ball forward without additional statutory directive.”

- **August 10, 2016- *Joint Filing on Efforts Towards Power Pooling and Joint Dispatch between Anchorage Municipal Light & Power, Chugach Electric Association, Inc. in Response to Order No. 3 in I-15-001***: Chugach Electric Association, Inc. (“Chugach”) and the Municipality of Anchorage d/b/a Municipal Light & Power (“ML&P”), (Chugach together with ML&P, the “Parties” or each individually, a “Party”) are pleased to report that progress on these efforts is continuing to move forward. Chugach and ML&P are still the process of developing the details of the joint dispatch and pooling arrangements which will provide the contractual and operational framework, coordinated scheduling, dispatch and settlement transactions for the exchange of energy, capacity and ancillary services for the maximum benefit of bulk power services to each utility. The filing states that the parties are in agreement regarding protocol on how dispatch would work, settlement process including generation selection and are analyzing dispatch software.
- **August 10, 2016 - *Homer Electric Association Inc.’s Update on Report on the Opportunity to Form a Railbelt Transmission Company and Consideration of Centralized Economic Dispatch***: HEA reports that it “continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. HEA has been involved with the Promod modeling analysis group, which has been working on investigating possible benefits of Railbelt-wide economic dispatch as a part of the effort exploring the possible formation of a Railbelt transmission company. To date, analysis of the Promod model is not yet complete. Although ,HEA anticipates this process will be completed in the Q3/Q4 2016 timeframe. It is difficult to forecast how the timeline will evolve once the governing bodies have voted and at what extent all entities will elect to participate. With the complexity of this issue, a phased-in approach may be determined to be the best route as we move forward. HEA looks forward to further benefits as the loose power pool increases the utilities’ opportunities to optimize the operation of their power generation units and keep less efficient units offline. HEA believes the opportunities presented through this bilateral process bring considerable benefit to its members without the significant costs associated with an organization requiring a supporting infrastructure necessary to conduct economic dispatch on a continual basis.”
- **August 17, 2016 – RCA Special Public Meeting**: The Commission summarized the results of pooling efforts to date: The working group has collaborated to develop an economic dispatch model designed to conduct merit order dispatch subject to transmission and generating unit operating constraints. Then there was a central pool

which included ML&P, Chugach, and MEA forming a power pool to coordinate generation scheduling and the provision of reserves for the benefit of these three combined loads. And transactions between this pool and each of the other two utilities, and between these two utilities are restricted as in the self-schedule scenario. And then the scenario with central pool plus Golden valley, some of the similar type statements that you just heard. And then there's another scenario with a central pool plus HEA, ML&P, Chugach, MEA, and HEA forming a power pool to coordinate generation scheduling and provision of reserves for the benefit of everyone's combined load. And then there's a Railbelt pool where all the utilities form a single power pool to coordinate generation scheduling and the provision of benefits for their combined loads. And this presumes a Transco and ISO existing. So there's sort of a whole range of possibilities.

- **August 23, 2016 –RCA Public Meeting:** Chugach and ML&P presented updates on their power pooling efforts discussing dispatch protocol, settlement process and provided a settlement example. Chugach went on to state that it didn't believe there were barriers to the other railbelt utilities to join the pooling efforts as long as they agreed to the settlement process; that it envisioned MEA being able to join the pool shortly with GVEA and HEA to follow, not as pool member but through bi-lateral contracts to begin with. Software modeling was discussed. MEA presented its proposal to move forward which included points on loose power pooling as a transition to full economic dispatch and tight pooling and finally moving from a tight power pool to a Unified System Operator.
- **August 24, 2016 - *Homer Electric's Response to Commission Question Regarding its Existing Authority to Regulate Dispatch of Power*:** HEA answers that "The Commission's statutory and regulatory authority does not extend to mandating the creation of an independent system operator or similar entity and to regulating the rates and practices of such an entity.
- **September 9, 2016- *Matanuska Electric's Association, Inc.'s Response to Commissioner Questions of August 17, 2016*:** MEA states that is pleased with the voluntary, cooperative efforts of the Railbelt utilities over the past year that have garnered significant cost savings and a reliable data set for making joint decisions. The primary goal is to coordinate the suite of electrical generation on the Railbelt to increase reliability and decrease the amount spent on fuel, the largest component of rates. As was noted, the most significant component of rates and therefore the greatest corresponding potential for savings lies with fuel. The recent investment in more efficient, well-matched generation capacity in the Railbelt has created an optimal scenario to garner benefits from collaboration. Over the past year, MEA has been a consistent player in various loose power pool transactions that allow utilities to buy and sell power when it is more

economic than generating their own. This has resulted in proven fuel savings between participating utilities. These transactions not only include energy, but reserve sharing. Modeling indicates the majority of available savings can be realized with these transactions. In addition, the data highlights that a tight power pool to facilitate economic dispatch of generation units in the Anchorage/Mat-Su area, will not only formalize these transactions, but allow for additional efficiencies in the future.

- **October 28, 2016- *Matanuska Electric Association Inc.'s Third Quarter 2016 Report concerning cost, benefits and other outcomes of voluntary power pooling – RCA Recommendation No. 2:*** MEA states that it “continues to conduct economy energy power sales and purchase transactions with the other Railbelt utilities to the benefit of all for cost savings, which can then be passed on to MEA's members. Attached is the data reflecting all spinning reserve and economy energy transactions in which MEA participated through the third quarter of 2016...MEA is pleased to report it is now fully engaged in the formation of a tight power pool with Chugach Electric Association, Inc. (Chugach) and Municipality of Anchorage d/b/a Municipal Light & Power Department (ML&P). As has been represented to the Commission by Chugach and ML&P at the August 24, 2016 public meeting, expanding upon the efforts of Chugach and ML&P to include the efficient generation of MEA in a tight pool works well in pursuit of maximizing the value of economic joint electric and fuel dispatch. MEA's contributions have also been constructive with respect to the overall settlement process. We are now actively working to finalize a Power Pooling and Joint Dispatch Agreement, and are optimistic that such an agreement can be filed with the Commission prior to the end of 2016.”
- **October 31, 2016 *Homer Electric Association Inc.'s Fourth Status Report on Voluntary Power Pooling Opportunities:*** HEA states that it “continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the third quarter of 2016.”
- **November 1, 2016 - *Joint Filing on Efforts Towards Power Pooling and Joint Dispatch between Anchorage Municipal Light & Power, Chugach Electric Association, Inc. and Matanuska Electric Association, Inc. in Response to Order No.3 in I-15-001:*** Chugach Electric Association, Inc. ("Chugach") Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") report that they are revising the Power Pooling and Joint Dispatch Agreement (Agreement) to incorporate participation by MEA. It is anticipated that the Agreement will be filed with the Commission as an informational filing by December 30, 2016, with a complete submittal of the Agreement and any attendant related agreements in 2017. The participating Parties continue efforts to refine the Settlement Model to

incorporate MEA, and have created committees made up of subject matter experts. The committees are meeting weekly to develop dispatch and protocol procedures, to establish gas nomination protocols and procedures, and to identify necessary changes and improvements to supervisory control and data acquisition ("SCADA"), and to develop a production costing model necessary for joint dispatch. The participating Parties anticipate beginning a joint loose pool operation in December 2016, operating under established Commission-approved energy tariffs for non-firm service. The SCADA upgrades for the participating Parties is scheduled to be completed next year and will allow for a tight pool operation. The participating Parties have taken part in several meetings with Golden Valley Electric Association, Inc. and Homer Electric Association, Inc. to provide them with updates on the progress that has been made and the timing of including other potential parties into the agreement. We expect to have similar meetings with the City of Seward.

- **December 29, 2016 - *Joint Filing on Efforts Towards Power Pooling and Joint Dispatch among Anchorage Municipal Light & Power, Chugach Electric Association, Inc. and Matanuska Electric association. In Response to Order No. 3 in I-15-001:*** Chugach Electric Association, Inc. ("Chugach") Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") report that "Since the October 31, 2016 update, the Parties have made considerable progress and have a draft Agreement that is being reviewed by respective counsel for the Parties. In addition, in parallel with negotiating the Agreement, the Parties are continuing to refine the settlement model and are in the process of revising dispatch and protocol procedures, gas nomination protocols and procedures, and changes to supervisory control and data acquisition systems. Meetings have been held with Golden Valley Electric Association, Inc., Homer Electric Association, Inc. and the City of Seward, and each utility was provided earlier versions of the Agreement for their consideration. No comments on earlier drafts of the Agreement were provided. The Parties are attempting to have an executed Agreement soon and will provide a status update to the Commission no later than January 31, 2017."
- **January 30, 2017 - *Matanuska Electric Association Inc.'s Fourth Quarter 2016 Report concerning cost, benefits and other outcomes of voluntary power pooling – RCA Recommendation No. 2:*** MEA continues to conduct economy energy power sales and purchase transactions with the other Railbelt utilities to the benefit of all for cost savings, which can then be passed on to MEA's members. Attached is the data reflecting all spinning reserve and economy energy transactions in which MEA participated through the fourth quarter of 2016, which also contains year end totals as well.
- **July 1, 2017- *Joint Efforts Towards Power Pooling and Joint Dispatch among Anchorage Municipal Light & Power, Chugach Electric Association, Inc. and***

Matanuska Electric Association. And Joint Informational Filing of Amended and Restated Power Pooling and Joint Dispatch Agreement: Chugach Electric Association, Inc. ("Chugach") Matanuska Electric Association, Inc. (MEA), and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") report that on "2/1/2016 the parties filed a report regarding the development of a power pooling and joint dispatch arrangement that included projected qualitative and quantitative benefits. Status reports were filed May 2, and August 10, 2016. In October 2016, the parties informed that an agreement for power pooling and joint dispatch was being negotiated. The current filing includes a draft agreement that represents a framework. Though the parties did not request RCA approval of the contract, they stated the agreement laid out for the Commission the process in which the parties plan to participate in power pooling and joint dispatch."

- ***January 31, 2017 - Homer Electric Association Inc. 's Fifth Status Report on Voluntary Power Pooling Opportunities:*** HEA reports that it "continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the fourth quarter of 2016...HEA anticipates these transactions to decrease during the first and second quarter of 2017 as HEA's system will be "islanded" from the rest of the Railbelt grid due to transmission maintenance work."
- ***April 28, 2017 - Homer Electric Association Inc. 's Sixth Status Report on Voluntary Power Pooling Opportunities:*** HEA reports that as its "loose power pool economic dispatching data reflects, there are a limited number of transactions between HEA and other utilities, in terms of both reserves and energy sales during the first quarter of 2017. The Kenai to Anchorage 115 kV tie line was out of service due to Chugach Electric Association, Inc. (CEA) performing maintenance from March 1, 2017 through April 8, 2017. This left the Kenai Peninsula in "island" condition with no transmission path for power exchanges. During this time, HEA provided regulation and frequency control for CEA loads in Cooper Landing and Seward. CEA generation to Cooper Landing and Seward was provided by Bradley Lake Hydro. It is important to note, these transactions only represent HEA's activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA anticipates these transactions to increase during the second quarter of 2017, as HEA's system will be no longer be "islanded" from the rest of the Railbelt grid due to transmission maintenance work."
- ***July 31, 2017 - Homer Electric Association Inc. 's Seventh Status Report on Voluntary Power Pooling Opportunities:*** HEA reports that it "continues to make power sales and

purchase transactions with the other Railbelt utilities to the benefit of all in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the second quarter of 2017..... The loose power pool arrangement relies on a significant amount of utility coordination. To this end, HEA participates in the weekly tight/loose power pool meetings with the other Railbelt utilities and other occasional meetings to discuss various issues or processes. HEA continues to be pleased with the professionalism and collaboration at the dispatch and operational levels to complete economy energy transactions.....These transactions represent a major step towards realizing the benefits achieved through simple economic dispatch. HEA looks forward to further benefits as the loose power pool allows buying utilities to optimize the operation of their power generation units and keep less efficient units off line. The selling utility's economy energy revenues are used as a credit against its cost of power, thus quickly passing the benefits of these sales to its members in lower Cost of Power Adjustment (COPA) rates. These bi-lateral transactions result in both the purchasing utility's and the selling utility's customers paying a lower price for their power."

- **September 27, 2017- RCA Public Meeting:** ML&P led a joint presentation of a progress update for the power pooling and joint dispatch agreement which was ... developed to formalize a process to ensure the resources owned and under contract to the pooling parties are operated efficiently and to the benefit of the consumer. The agreement provides a contractual framework for coordination coordinated scheduling, dispatch, and settle selling transactions related to the exchange of energy, spin, and regulation within the Railbelt. Chugach and ML&P reported that they performed a test run of joint dispatch and pooling on July 19. They indicated their next steps would include transactions with the non-pooling parties. Chugach/ML&P stated they were in process of procuring software for joint dispatch scheduling and settlement. MEA stated that the cost savings from the July 19 test was "catalyst" for moving towards "optimal dispatch." TR 34.

Chris Rose of REAP provided public comments regarding progress on the Commission's 2015 recommendations to the Legislature; "This this is some language taken from the your letter to the State Legislature that you referenced earlier today, finding number 2. And, you know, I guess I'd focus on that second paragraph that says, "Non-discriminatory access, open and transparent transmission pricing, and economic dispatch by an independent entity are key principles that must guide the transformation of the electrical system In -- in the Railbelt." And we certainly do appreciate all the tremendous efforts that have been made that have been spoken about earlier today by the Railbelt utilities to form a tight power pool. There has been tremendous voluntary progress. I've had a lot of great conversations with people here in the room from all the utilities, and I know they're

working really hard. But they have not addressed these -- these things here that you folks talked about completely. We've got still issues with transmission pricing. We've got issues with the trans- -- access to the grid. You just heard one of the participants say that there is no power pool entity. That means that if you are an independent power producer, you don't know who to talk to. There is no entity to talk to. There's not an independent entity yet that has been formed." TR83-84

- **October 30, 2017 - *Homer Electric Association Inc.'s Eighth Status Report on Voluntary Power Pooling Opportunities:*** HEA "submits this report for the record, in advance of the October 30, 2017 deadline for the third quarterly report, specifically to comply with recommendation number two (2) of the Commission's letter. HEA continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the third quarter of 2017. In addition, HEA includes a table that summarizes transactions for 2017 year-to-date, for informational purposes. As this loose power pool economic dispatching data reflects, there are a limited number of transactions between HEA and other utilities, in terms of both reserves and energy sales during the third quarter of 2017. HEA conducted power exchanges with Chugach Electric Association, Inc. (CEA) in July to accommodate full load testing and to provide Volt-Ampere Reactive (VAR) support during commissioning of the Soldotna Static VAR Compensator (SVC). It is important to note, these transactions only represent HEAs activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA anticipates these transactions may increase during the remainder of 2017, as the Bradley Lake generator unit and tie line restrictions have been removed with the completion of the refurbishing of the SVCs at Daves Creek and Soldotna. These conditions inhibit HEAs ability to conduct both off-system sales and purchases of power. In addition, regularly scheduled maintenance is planned for the Nikiski unit during the fourth quarter. HEA is negotiating power purchases and Bradley Lake capacity purchases to fulfill its obligations, if the price is beneficial to its membership."
- **January 30, 2018 - *Homer Electric Association Inc.'s Ninth Status Report on Voluntary Power Pooling Opportunities:*** HEA reports that it "continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the fourth quarter of 2017. In addition, HEA includes a table that summarizes all transactions for 2017 for informational purposes. As this loose power pool economic dispatching data reflects, there are a limited number of transactions between HEA and other utilities in terms of both reserves and energy sales during the fourth quarter of 2017. Given HEA's proximity

to Bradley Lake, HENs main activity during the fourth quarter focused primarily on the purchase and sale of capacity. It is important to note, these transactions only represent HEA's activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA anticipates that the level of transactions may increase during 2018 due to postponement of the Kenai/Anchorage 115 kV tieline maintenance. However, the tie-line restrictions continue to be the bottleneck for transactions between HEA and Northern utilities. At the request of the Bradley Lake O&D Committee, CEA as the Bradley Lake Dispatcher has recently begun to distribute a daily Bradley Lake Railbelt schedule to provide a comprehensive schedule of all Bradley Lake users. This will enable better utilization of unused Bradley Lake Capacity.”

- **April 30, 2018 - *Homer Electric Association Inc.'s Tenth Status Report on Voluntary Power Pooling Opportunities*:** HEA reports that it “continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the first quarter of 2018. In addition, HEA includes a table that will summarize all transactions for 2018 for informational purposes. As this loose power pool economic dispatching data reflects, there are a limited number of transactions between HEA and other utilities in terms of both reserves and energy sales during the first quarter of 2018. Given HEA's proximity to Bradley Lake, HEA's main activity during the first quarter focused primarily on the purchase and sale of capacity. It is important to note, these transactions only represent HEA's activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA anticipates that the level of transactions may increase during 2018 due to postponement of the Kenai/Anchorage 115 kV tieline maintenance. However, the tie-line restrictions continue to be the bottleneck for transactions between HEA and Northern utilities. At the request of the Bradley Lake O&D Committee, CEA as the Bradley Lake Dispatcher has recently begun to distribute a daily Bradley Lake Railbelt schedule to provide a comprehensive schedule of all Bradley Lake users. This will enable better utilization of unused Bradley Lake Capacity.”
- **May 8, 2018 – RCA Public Meeting:** Commissioner Pickett reminded the utilities that “In that original report, we strongly suggested that it was in everybody's best interest to let all the voluntary efforts continue and the processes in these various areas go forth. And since that time, I've personally testified on a number of occasions before the legislative committees and have told them that this process is continuing. But I think, come the next session, there's going to need to be a follow-through, particularly in a couple of the elements, with specific outcomes that have been stated to this commission that were to be happening,” TR 6

Commissioner Scott went on to address the impacts of the proposed acquisition of ML&P by Chugach: "I'd like to make a couple of observations, please. The first is just an issue of terminology. If - if a USO means a unified system operator, and that just means unified dispatch, then what the tight pool was or would have been is a unified system operator for the parties that are in the tight pool. They're not really different. In fact, they're not remotely different in terms of the functions that they provide. I believe it was at the June 2018 public meeting, we had a certain amount of back and forth, what was at that time, pretty hopeful we were done. In terms of the commercial agreements, we were done. In terms of the software work, things had moved along. Light at the end of the tunnel. And in that discussion, it -- we talked about how the Anchorage area tight pool was a unified system operator for those three utilities, or would be, and provided a good platform or subsequently potentially expanding that to the rest of the Railbelt if it made sense, and that's an open question, whether it made sense, you know, it's -- it's a function of incremental investments on transmission and whether that makes sense, how much dispatch benefits you're going to get, reliability requirements, ... So it has been characterized that the acquisition, if proved, is the tightest of tight pools, and I guess what I would say is there's no distinction, actually, I mean, for the record, and as far as those two utilities' dispatch is concerned. Today each of the -- the separate vertically integrated utilities performs security constraint merit order dispatch. That's what they do, and they have production-cost modeling software that enables them to do that. That's the nature of what -- vertically integrated utility, that's -- that's what these guys do every day. The value in a tight pool, or in another governance structure to enable unified merit order dispatch, is you reduce some of the constraints. So rather than dispatching associated with the resources you own and control, supplemented by whatever trades you can make, you reduce constraints by basically ignoring the commercial boundaries. I think we need to have some kind of discussion of that fact, because while there may be additional benefits associated with the acquisition that have nothing to do with dispatch, there's no extra benefits associated with dispatch in terms of the benefits, and what concerns me greatly is that the progress towards including potentially MEA and that kind of arrangement may or may not occur, because, again, we have the issue of, well, you digest a new utility. There's a lot to figure out, including figuring out where my commercial advantages may lie, and so there's not necessarily a process for knitting that together in the future. It may not fully make sense for parties to give up future options that they feel that they have. I just think some of that factual background needs to be laid out to provide context, because these terms by themselves don't self-execute. They're not obvious what they mean by any stretch... so it's not saying that people are disingenuous, or not trying hard, or don't have good will, but this is not all in your process. I do not see us asymptotically trending towards any finish line with regard to merit order dispatch. TR46-48.

The Commission then set three future dates for public meetings at which the utilities were to report and demonstrate progress made with regard to three of the Commission's 2015 recommendations to Legislature: Transco, set for May 23; Power Pooling and Joint Dispatch, set for June 13, and Reliability Standards, set for June 27th.

- **June 13, 2018 - RCA Public Meeting:** Chugach, along with MEA and ML&P presented an update power pooling and economic dispatch efforts; “So the update today is to provide you what we've done since September 27th and what we're going to get done. I know it's been on your mind. It's been on our mind. The pooling agreement objective is the same objective we had last year. I'm going to review that briefly because it sets the tone and context for the presentation...we'll talk about the development period ...and what's taking so long to get this done. we'll talk about the pooling organization, the test days that we've had. we'll give you the schedule, which we're committing to completing.” TR11-12. The three utilities set forth that the purpose of the proposed twenty year pooling and dispatch agreement, was to move away from the current situation where each day the utilities communicate with each other in order to meet individual utility dispatch needs. The utilities ran two tests in 2017; one in July and another on November. Both tests runs encouraged the utilities to continue their efforts. The utilities planned to have a finalized settlement agreement and dispatch procedures in place by September of 2018, software selected and implemented by November of 2018. Commissioner Scott inquired about dispute resolution process citing to “three Alaska Supreme Court decisions entitled MEA versus Chugach,” asking where the parties were in crafting those processes. TR41-42. Chairman McAlpine went on to state, “having to deal with another group of utilities who don't seem to be able to resolve things among themselves. And when they do, it doesn't necessarily evolve to the customers' advantage. And I'm speaking specifically about the structure where the utilities have control over the governance, that -- if you'd comment on that.” Chugach explained that the pooling agreement is designed to improve the operation efficiency and it did not address broader governance issues. HEA explained it had been asked to participate, and supports the process but explained that the wheeling charges made the process unworkable for them. TR51.
- **July 31, 2018 - Homer Electric Association Inc.'s Eleventh Status Report on Voluntary Power Pooling Opportunities:** HEA reports that its “loose power pool economic dispatching data reflects, there are a limited number of transactions between HEA and other utilities in terms of both reserves and energy sales during the second quarter of 2018. Given HEA's proximity to Bradley Lake, HEA's main activity during the second quarter focused primarily on the purchase and sale of capacity. It is important to note, these transactions only represent HEA's activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA

anticipates that the level of transactions may increase during 2018 due to postponement of the Kenai/ Anchorage 115 kV tie-line maintenance. However, the tie-line restrictions continue to be the bottleneck for transactions between HEA and Northern utilities. Additional power sales between utilities will be coordinated to accommodate annual maintenance and power tunnel gate testing on the Bradley Lake unit....The loose power pool arrangement relies on a significant amount of utility coordination. To this end, HEA participates in the weekly tight/loose power pool meetings with the other Railbelt utilities and other occasional meetings to discuss various issues or processes. HEA continues to be pleased with the professionalism and collaboration at the dispatch and operational levels to complete economy energy transactions... These transactions represent a major step towards realizing the benefits achieved through simple economic dispatch. HEA looks forward to further benefits as the loose power pool allows buying utilities to optimize the operation of their power generation units and keep less efficient units off line. The selling utility's economy energy revenues are used as a credit against its cost of power, thus quickly passing the benefits of these sales to its members in lower Cost of Power Adjustment (COPA) rates. These bi-lateral transactions result in both the purchasing utility's and the selling utility's customers paying a lower price for their power."

- **September 12, 2018- Order I-15-001(8)/I-16-002(8) *Order Inviting Final Round of Presentations before Second Response to Legislature:*** In preparing to report to the Legislature, the Commission ordered "that any public utility or other interested person may individually or jointly with others make a public presentation on the issues identified in the body of this order at the public meetings scheduled at 9:00 a.m. on September 26, 2018, October 10, 2018, and October 24, 2018."
- **October 5, 2018 - *Update on Efforts Towards Power Pooling and Joint Dispatch among Chugach Electric Association, Inc., Anchorage Municipal Light & Power and Matanuska Electric Association, Inc.:*** Chugach Electric Association, Inc. ("Chugach") and the Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P") wish to provide the Commission with an update on continued efforts to bring joint dispatch and power pooling to the Railbelt. Chugach, ML&P and Matanuska Electric Association, Inc. ("MEA" and, together with Chugach and ML&P, the "Parties") report that "We have made significant progress refining the dispatch procedures and settlement process that will form the core of the power pooling relationship among the Parties, including development of a central scheduling service model and related audit procedures. We have tested the dispatch procedures twice and achieved joint security constrained economic dispatch on both test days, including achievement of an 87% capacity factor for all committed resources during the summer test and a 92% capacity factor for committed resources during the winter test day. As we have worked towards completion of an

agreement to submit for Commission approval, we have been mindful of Chugach's intention to acquire ML&P. This acquisition will necessarily alter foundational aspects of the power pooling concept, including generation and transmission ownership, rights to non-owned generation, and ownership and actual and imputed costs of natural gas resources. As the terms of the acquisition are in the process of being finalized, it is difficult to determine precisely how the acquisition will affect the decisions and agreements that need to be made to fully implement power pooling. Chugach expects to file a request for approval of the acquisition during the first quarter of 2019.”

- **October 10, 2018 – RCA Public Meeting:** Chugach and ML&P updated the Commission that as Chugach enters into the acquisition of ML&P, the utilities have paused the power pooling and joint dispatch efforts and reiterated points made in their October 5th letter. The utilities did state that they were continuing to participate in economy energy sales.
- **October 24, 2018 – RCA Public Meeting:** The Renewable Energy Alaska Project or REAP, provided comments; “REAP and others were [sic] disappointed that the function of economic dispatch for the entire Railbelt was not recommended by GDS. Instead, GDS proposed another study to look at the benefits and cost of economic dispatch. Perhaps GDS was, in part, relying on the fact that the three Anchorage-serving utilities had already promised the commission to develop a so-called tight power pool to economically dispatch electronics in the Anchorage area. However, two weeks ago we heard that the tight power pool is on pause...Each one of the utilities has a fiduciary duty to their own members and not the region. As a consequence, the region as a whole is suffering from expensive lawsuits, inefficiencies, and delay. With the state in a long recession, the Railbelt with a decreasing electrical demand, and a state economy that is still highly dependent on a world commodity whose price we cannot control, Alaska can ill afford the vulcanization and inefficiency that still exists on the Railbelt today.....REAP would like to ask the commission where this process is going.” REAP went on to state that... “the Commission has the right to be skeptical” and asked “when compulsory steps” would be taken. TR5-9
- **October 30, 2018 - *Homer Electric Association Inc.’s Twelfth Status Report on Voluntary Power Pooling Opportunities:*** HEA Reports that as its “loose power pool economic dispatching data reflects, there were a limited number of transactions between HEA and other utilities in terms of both energy exchanges and sales during the third quarter of 2018. It is important to note, these transactions only represent HEA's activity, which is a relatively minor part of the total transactions and coordination that occurs on a daily basis on the Railbelt. HEA anticipates that the level of transactions will increase

during the fourth quarter of 2018 due to the planned outage at the Nikiski Combined Cycle (NCC) plant and Bradley Lake levels reaching pending spill action points.”

- **November 6, 2018 – Order I-15-001(9)/I-16-002(9), Order Requiring Filings:** “At our public meeting held October 24, 2018, we also expressed interest in reviewing daily transactional data with regard to the economy energy sales and purchases that have taken place between the Railbelt electric utilities. This order provides additional detail regarding the granularity that we require for this data. Specifically, we request submission of Excel documents that include the following data for the periods covering April 1 through September 30 of 2017 and 2018: 1. Each day’s economy energy transactions (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price; 2. All spin transactions (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price. Each day’s transaction data should be recorded in spreadsheet rows, with the variables indicated in spreadsheet columns. Data should be disaggregated to the level of the transaction. For example, if on a given day a given buyer and seller have two different prices for transacted economy energy then each should be recorded in a different row; similarly, at a given price the transaction data associated with each buyer-seller pair will be its own spreadsheet row. In addition, in each utility’s filing they shall report: 3. Their daily native load; 4. Each generation resource dispatched; 5. The average heat rate for the day of each owned generation resource dispatched; and 6. The MWh generated from each owned and dispatched generation resource. As with the transaction data, each utility load and generation data should be recorded as column data on a daily basis. We request that each utility’s filing include the submitted data entered into an unlocked Excel spreadsheet with working formulas.”
- **November 18, 2019 - Municipal Light and Power’s Request for Extension of Timeline of Ordering Paragraph No. 3 Of Order No. I-15-001(9) / I-16-002, and Request for Expedition Consideration:** MLP requested an extension because it does not store the historical data as requested by the Commission and would need to create the excel spreadsheets in the RCA required format by inputting that data from disparate historical sources.
- **November 21, 2018 - Seward’s Notice Regarding Transactional Data:** The City of Seward responded it not purchased or sold any economy energy.
- **November 21, 2018 - Chugach Electric Association, Inc.’s Notice Of Filing In Compliance With Order I-15-001(9)/I-16-002(9):** Chugach’s notice that confidential data was filed on disc marked confidential pending motion for confidential treatment. All non-confidential data was filed on separate disc.

- November 21, 2018 – *Matanuska Electric Association’s Order I-15-001 (9)/I-16-002(9) Compliance Filing Re: Requested 2017 and 2018 Dispatch Data:*** MEA Response to RCA Order. MEA's daily data indicates a dynamic flow of financial transactions being undertaken on a regular basis for the benefit of the Rail belt electric ratepayers, consistent with our economy energy tariff. While these transactions do not constitute full economic dispatch as contemplated in the recent 'tight pool' discussions, they do reflect similar scheduling and dispatch processes and, for MEA, have produced comparable transactions and savings to what was previously modeled under full economic dispatch. MEA states that the data may not adequately reflect that it periodically dispatches few units at EGS in periods of low demand, nor does it reflect the joint activity of MEA, Chugach and Golden Valley to purchase and incorporate wind power. MEA states that security constraints have created limitations that had not been envisioned in past economic modeling.
- November 21, 2018 - *Response to Data Requests in RCA Docket Nos. I-15-001/I-16-002:*** Golden Valley Electric Association (GVEA) hereby provides the accompanying Excel file containing the information for data requests 1 through 3 as requested in Commission Order No. 9. The Excel file contains the following GVEA-specific data for the periods covering April 1 through September 30, 2017, and April 1 through September 30, 2018: 1. Each day’s economy energy transactions (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price; 2. All spin transactions (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price; and 3. Daily native load.
- November 21, 2018 - *I-15-001 In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System, Order I-15-001(9) and I-16-002 In the Matter of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order I- 16-002(9):*** Homer Electric Association Inc.’s submission of data regarding economy energy sales and purchases among themselves. In particular, data was requested for the periods from April 1 through September 30 of 2017 and 2018, for each day's economy energy transactions and all spin transactions, with the buyer, seller, quantity, and price information to be noted. Additional data was requested regarding daily native load, generation resources dispatched, MWh generated by each unit and the corresponding unit's average heat rate. In response to the Commission's request, Homer Electric Association, Inc. ("HEA") provides the following Excel spreadsheet, "I-15-00 I (9) Response," with the requested data. The first tab labeled "Generation Dispatch" provides daily data with HEA's native load, total MWh by generation unit, average hourly generation during operation and average daily heat rate. Additional tabs are provided for each individual month recording the daily breakdown of energy, spin and capacity sales and purchase by HEA with the other Railbelt utilities.

- November 26, 2018 - *GVEA's Confidential Response to Data Requests 4 through 6 in RCA Docket Nos. 1-15-001/116-002***: Golden Valley Electric Association (GVEA) hereby provides the accompanying Excel file containing the information for data requests 4 through 6 as requested in Commission Order No. 9. The Excel file contains the following GVEA-specific data for the periods covering April 1 through September 30, 2017, and April 1 through September 30, 2018: Each generation resource dispatched; The average heat rate for the day of each owned generation resource dispatched; and The MWh generated from each owned and dispatched generation resource.
- November 26, 2018 - *I-15-001 In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System, Order I-15-001(9) and I-16-002 In the Matter of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order I- 16-002(9)***: Homer Electric Association Inc.'s submission of data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWH for generations sources and summary of events affecting transmission for April to September of 2017 and 2018.
- December 21, 2018 – Order I-15-001(9)/I-16-002(9), - *Order Granting Petition for Confidential Treatment, Noting Partial Compliance with Filing Requirement, and Requiring Filing***: We grant the joint petition (Petition for Confidential Treatment) filed by five Railbelt electric utilities of unit-specific transactional data related to energy sales and purchases....Commission Staff's review of the filed information indicated that while most of the requested information was timely submitted by the Railbelt electric utilities, there were some omissions in the filing by Chugach...The Commission requires Chugach to file a revised compliance filing including Excel documents that include the omitted information by Monday, December 31, 2018.
- December 28, 2018 - *Compliance Filing for I-15-001(11) In the Matter of Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System / I-16-002 (11) In the Matter of the Evaluation of the Reliability and Security Standards and Practices of Alaska Electric Utilities***: In Order No. 11 dated December 21, 2018, the Commission noted that Chugach's response did not include economy energy sales or purchases for Homer Electric Association, Inc. (HEA) and for several Matanuska Electric Association, Inc. (MEA) transactions. In addition, it was stated that Chugach did not file the price for all spin transactions. In the Order, the Commission required Chugach to supplement its response with this additional information. Chugach respectfully submits this supplemental response to its November 21, 2018 compliance filing

- December 28, 2018 - Municipal Light and Power's Submission of Data in Compliance with Ordering Paragraph No. 3 of Order No. I-15-001(9) / I-16-002(9); Verification Regarding Confidential Electronic Documents:** In compliance with Ordering Paragraph No. 3 of Order No. I-15-001(9)/I-16-002(9) (Nov. 6, 2018) ("Order No 9"), the Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P") hereby submits Exhibits 1a, 1b, 1c, and 2. Exhibits 1a, 1b, and 1c are filed publicly and provide the information required by items 1, 2, and 3 on page 4 of Order No. 9.1 Exhibit 2 provides the information required by items 4, 5, and 6 on page 4 of Order No. 9 and is being filed under seal with the Commission.² The Commission previously approved confidential treatment of this information.³ ML&P is also submitting a compact disc containing the electronic Excel files used to generate Exhibits 1a, 1b, 1c, and 2.
- January 30, 2019 - Homer Electric Association Inc.'s Thirteenth Status Report on Voluntary Power Pooling Opportunities:** "Homer Electric Association, Inc. (HEA) submits this report for the record, in advance of the January 30, 2019 deadline for the fourth quarter of 2018 report, specifically to comply with recommendation number two (2) of the Commission's [June 30, 2015] letter [to the Legislature]."
- March 13, 2019 – RCA Public Meeting:** Commissioners discussed what might be included in the Commission's upcoming progress report to the Legislature. There was agreement on Commissioner Scott's summary: "that there are loose pool operations going on, in which on a daily basis, on an hourly basis, the Railbelt utilities are making trades among themselves to reduce cost for the ratepayer. There's no question that that's occurring every single day, and, indeed, it's not completely mechanical. I mean, you -- we are seeing -- the trades that occur are changing as the generation of resources have shifted, and -- and I think that's important to note as part of this, but the end point, which the Commission referred to in its 2015 findings, and which we had substantial voluntary progress in the tight pool efforts for a couple of years until last winter, remains elusive. TR19.
- March 27, 2019 – RCA Public Meeting:** RCA Staff presented analyses of data provided by the utilities. Comparisons were made one two sets of data for a specific time frame; one data set for 2017 and a second data set for 2018. From those data sets, Staff analyzed six metrics. What it found was that "basically the price of economy energy is going -- is decreasing." TR17. Commissioner Scott observed "that there has been an increase in cooperation and an increase in the ability of each of the separate utilities to wring out greater efficiencies through the economy energy marketand I think this suggests that voluntary cooperation has provided benefit for ratepayers. I think that's clear, that that trend is positive. TR22-23. The Commission decided to continue requiring the utilities to report data on a quarterly basis.

- April 10, 2019 - RCA Public Meeting:** Chairman Pickett reported on the status of the Commission's planned follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015. He stated that "The second finding dealt with what has been termed the security constrained merit order dispatch of the new generation units in the Railbelt -- well, really, all the generation units in the Railbelt -- and we found that, you know, the finding was essentially -- even though there had been a number of bilateral economy energy sales, it really doesn't rise to the level of the merit order dispatch for a period of time, there was an effort to push and create a tight power pool with a limited number of the utilities in the Railbelt, primarily in the corridor, two, and then possibly three. But by virtue of what was presented to this Commission at a public meeting last fall, we were told that effort is essentially dead for the time being -- time being, not really well-defined. And so from institutional reform, commercial agreements, to date, that has not happened. Does that mean that there aren't economy energy sales or bilateral transactions between utilities? No. Not at all. But that is not system -- that's more of a CPCN constraint utility managers making rational economic decisions within their own CPCN area. So that's going to be something, that as this goes forward to the Legislature, they'll have to make a determination, and the administration as to whether that is sufficient. TR 79-80
- April 24, 2019 - RCA Public Meeting:** Chairman Pickett reported on the status of the Commission's planned follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015. The status update described the format of the planned report and discussed the substance of the report. The meeting concluded prior to the conclusion of Chairman's discussion.
- April 30, 2019 – Order I-15-001(14)/I-16-002(14), Order Requiring Filing:** We require the quarterly filing of the data requested by Order I-15-001(9)/I-16-002(9)... At our public meeting held March 27, 2019, we voted to require the quarterly filing of the data requested in Order I-15-001(9), which we intend to analyze and publish results there from our web site on an on-going basis. More specifically, we require each Railbelt electric utility to quarterly file the following daily information: 1. Each economy energy transaction (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price; 2. All spin transactions (sales and purchases) indicating (a) buyer, (b) seller, (c) quantity, and (d) price; 3. Its daily native load; 4. Each generation resource dispatched; 5. The average heat rate for the day of each owned generation resource dispatched; 6. The MWh generated from each dispatched generation resource. 7. MWh for station service for each dispatched generation resource; 8. The maximum available capacity of each owned thermal generation resource on the day of dispatch; and 9. A short explanation of

any significant events that offered dispatch for more than 2 days, such as major maintenance of generation or transmission resources

- **April 30, 2019 - *Homer Electric Association Inc.'s Fourteenth Status Report on Voluntary Power Pooling Opportunities***: HEA continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the first quarter of 2019.
- **May 3, 2019 - RCA Public Meeting**: Chairman Pickett resumed his discussion regarding the proposed follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015.
- **May 8, 2019 - RCA Public Meeting**: Chairman Pickett reported on changes and streamlining of the proposed follow-up response to the Legislature regarding the steps taken to implement the RCA's recommendations made to the Legislature in 2015.
- **June 21, 2019 - *Joint Comments of Chugach Electric Association, Inc. And Matanuska Electric Association, Inc. Regarding U-15-001, In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System***: Chugach Electric Association ("Chugach") and Matanuska Electric Association, Inc. ("MEA") jointly submit this letter informing the Regulatory Commission of Alaska ("Commission") that a filing will be submitted to the Commission supporting the approval of the Railbelt Reliability Council ("RRC") along with other supplemental participants as a proposed means to solve the Transmission ("Commission") that a filing will be submitted to the Commission supporting the approval of the Railbelt Reliability Council ("RRC") along with other supplemental participants as a proposed means to solve the Transmission coordination and planning issues raised in the RCA's June 2015 letter to the legislature.
- **July 26, 2019 - *GVEA's Compliance Filing of Non-Confidential Data (Dockets I-15-00111-16-002; GVEA's Compliance Filing Confidential data for the second quarter of 2019 (April - June))***: GVEA's submission of second quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, and summary of events affecting transmission. Pursuant to Commission Order Nos. 1-15-001 (12)/1-16-002(12) and 1-15-001 (14)/1-16-002(14), the data that GVEA is submitting is confidential and is being filed under seal.
- **July 29, 2019 - *Compliance Filing to Order No. I-15-001(14) / I-16-002(14); Quarterly Report On Economy Energy, Spin Transactions, Operational Data, and Significant***

Events: Chugach’s submission of second quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWH for generations sources and summary of events affecting transmission.

- **July 30, 2019 - *Homer Electric Association Inc.’s Fifteenth Status Report on Voluntary Power Pooling Opportunities*:** HEA “submits this report for the record, in advance of the July 30, 2019 deadline for the second quarter of 2019 report, specifically to comply with recommendation number two (2) of the Commission's letter. HEA continues to make power sales and purchase transactions with the other Railbelt utilities to the benefit of all, in both cost savings and increased operational efficiency. Attachment A presents the data reflecting all economy energy transactions of HEA for the second quarter of 2019. For additional informational purposes, also attached is a table that summarizes all transactions for 2019, year-to-date.
- **July 30, 2019 - *Order I-15-001 (14)/I-16-002(14) Compliance Filing Re: Second Quarter 2019 Dispatch Data*:** Matanuska Electric Association Inc.’s submission of second quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWH for generations sources and summary of events affecting transmission.
- **July 30, 2019 - *Municipal Light and Power’s Notice Of Submission of Data in Compliance with Order No. I-15-001(14)/I-16-002(14); Confidential Filing of Information*:** Municipality of Anchorage d/b/a Municipal Light and Power (“ML&P”) hereby notifies the Regulatory Commission of Alaska (“Commission”) of its first quarterly submission of data in compliance with Order No. I-15-001(14) / I-16-002(14) (“Order No. 14”). Order No. 14, issued on April 26, 2019, requires ML&P to submit nine categories of information relating to Railbelt economy energy and spinning reserve transactions. That order requires items 4 through 8 to be submitted as confidential information. Submitted herewith are Exhibits 1, 2, 3, and 4 providing the information required by items 1, 2, 3, and 9 of Order No. 14. The data is also being submitted electronically in excel format. Exhibit 5 provides the confidential information required by items 4-8 of Order No. 14 and is being filed under seal with the Commission.
- **August 2, 2019 - *I-15-001 In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System, Order I-15-001(14) and I-16-002 In the Matter of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order I-16-002(14)*:** HEA un-redacted data for 2Q2019, for each day's economy energy transactions and all spin transactions, with the buyer, seller, quantity and price information to be noted. Additional data regarding daily native load,

generation resources dispatched, MWh generated by each unit, the corresponding unit's average heat rate and maximum available capacity was provided under seal.

- **August 5, 2019 - *I-15-001 In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System, Order I-15-001(14) and I-16-002 In the Matter of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order I-16-002(14)***: Homer Electric Association, Inc. ("HEA")'s supplement of an unredacted version of the Excel file filed on August 2.
- **August 19, 2019 - *Comments by Homer Electric Association, Inc., In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System***: Homer Electric Association, Inc. ("HEA") states that the May 29, 2019 MOU does not reflect the understanding of the parties and further states that it was not made aware that the parties were drafting the MOU let alone invited to participate in the drafting process. HEA further argues that the RRC and any proposed OAT as set out in the MOU cannot be utilized to dispatch Bradley Lake power
- **October 21, 2019 - *I-15-001 In the Matter of the Evaluation of the Operation and Regulation of the Alaska Railbelt Electric Transmission System, Order I-15-001(14) and I-16-002 In the Matter of the Reliability and Security Standards and Practices of Alaska Electric Utilities, Order I-16-002(14)***: Homer Electric Association, Inc. ("HEA")'s submission of third quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWH for generations sources and summary of events affecting transmission.
- **October 23, 2019 - *Municipal Light and Power's Request for Extension of Time to Submit Quarterly Data***: ML&P request for nine day extension to file quarterly data per Order I-15-001(14).
- **October 30, 2019 – *Compliance Filing to Order No. I-15-001(14) / I-16-002(14); Quarterly Report On Economy Energy, Spin Transactions, Operational Data, and Significant Events***: Chugach's submission of third quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWH for generations sources and summary of events affecting transmission.
- **October 30, 2019 - *GVEA's Compliance Filing of Non-Confidential Data (Dockets I-15-001/I-16-002)***: GVEA's submission of third quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, and summary of events affecting transmission

- **October 30, 2019 – Order I-15-001(14)/I-16-002(14) Compliance Filing Re: Third Quarter 2019 Dispatch Data:** MEA’s submission of third quarter 2019 data regarding economy energy and spinning reserve transactions, daily native load, average heat rates for generation sources, data re MWh for generations sources and summary of events affecting transmission
- **November 1, 2019 - GVEA's Compliance Filing of Confidential Data (Dockets I-15-001/I-16-002):** “Golden Valley Electric Association, Inc. (GVEA) submits, in Excel format, the following confidential data for the third quarter of 2019 (July -September): Each generation resource dispatched; The average heat rate for the day of each owned generation resource dispatched; The MWh generated from each owned and dispatched generation resource; MWh for station service for each dispatched generation resource; and The maximum available capacity of each owned thermal generation resource on the day of dispatch.”
- **November 7, 2019 - Municipal Light and Power’s Notice of Submission of Data in Compliance with Order No. I-15-001(14)/I-16-002(14); Confidential Filing of Information:** The Municipality of Anchorage d/b/a Municipal Light and Power (“ML&P”) hereby notifies the Regulatory Commission of Alaska (“Commission”) of its third quarter 2019 submission of data in compliance with Order No. I-15-001(14)/I-16-002(14) (“Order No. 14”). ... Submitted herewith are Exhibits 1, 2, 3, and 4 providing the information required by items 1, 2, 3, and 9 of Order No. 14. The data is also being submitted electronically in excel format. Exhibit 5 provides the confidential information required by items 4-8 of Order No. 14 and is being filed under seal with the Commission. That filing also includes a compact disc containing the electronic Excel file used to generate Exhibit 5.