

October 15, 2023



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Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232 - Submitted via email: techforum@bpa.gov

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RE: Public Input on Establishing a Policy Direction on Potential Day Ahead Market Participation

The Public Utility District No. 1 of Franklin County (Franklin) appreciates the opportunity to provide public input to Bonneville Power Administration (BPA) in response to the Day-Ahead Market Participation Evaluation.

Franklin is hopeful that organized markets will provide BPA an opportunity to enhance their products but BPA's first and foremost obligation is the products that are critical for Franklin to provide service to our customers. Changes to these products and how BPA offers them to their customers could impact the cost and quality of services Franklin provides. BPA must also ensure that participation in an organized market preserves the value and statutory rights of its customers while participating in said markets.

Along with this decision BPA is also working on their Provider of Choice power contracts. Participation in a day-ahead market could dramatically impact these contracts specifically for Slice/Block customers, such as Franklin, and how load may be served differently than it is today. Franklin fully expects that BPA will conduct a complete investigation on how it's customers will be impacted from an operational, legal, financial, and contractual perspective. Only after which can BPA make a decision that benefits its customers.

While BPA may find benefit from joining an organized market there are several factors the market must operate within such as:

1. Maintain grid reliability.
2. Preserve the statutory rights of the preference customers.
3. Strong and effective independent governance structure which does not unduly discriminate in favor of or against specific market participants.

Franklin expects BPA to specifically evaluate which market achieves these objectives. Franklin does not support joining a market that doesn't provide equal benefits to all its customers and believes that joining the CAISO is the wrong decision based on their willingness to put California before any other market participant. August 2023 was a prime example of how CAISO would operate when energy is in high demand across the West.

Franklin will look to BPA to ensure that potential market participation would preserve the value of Franklin's right to service from the federal system and our customer's right to have a choice. Franklin does not support joining a market that doesn't provide benefits to all its customers.

Respectfully,



Scott Rhees
General Manager/CEO

C: Central Files

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