

March 25, 2019

Via Email ([techforum@bpa.gov](mailto:techforum@bpa.gov))

U.S. Department of Energy  
Bonneville Power Administration

**Re: Comments of Avangrid Renewables, LLC Regarding the March EIM Stakeholder Meeting**

Avangrid Renewables, LLC (“Avangrid”) hereby submits these comments on issues raised in the Bonneville Power Administration (“BPA”) EIM Stakeholder Meeting held on March 13, 2019 (the “March Meeting”). BPA staff asked stakeholders to provide feedback about certain invoicing options by March 24, 2019.<sup>1</sup> Avangrid respectfully recommends that BPA adhere as much as possible to commonly held practices among other entities that are already participating in the EIM. We also ask that BPA provide as much transparency as possible regarding the agency’s research and findings as to what BPA has learned about other entities’ participation. Finally, we urge BPA to provide stakeholders access to its EIM Issues and Venues Matrix without waiting until it is complete to do so. Avangrid appreciates the opportunity to submit these comments and looks forward to working with BPA throughout its EIM implementation.

**1. Initial Leanings on Invoicing Options**

At the March Meeting, BPA asked for specific feedback on its invoicing options and highlighted certain pros and cons for invoicing its customers from either the T+12 or T+55 EIM settlement statement data the agency will receive from CAISO. Although BPA will not be making a decision in the near term about which data to use for its invoicing, the agency has asked customers to weigh in with their initial leanings to better inform that future decision. To that end, Avangrid recommends that BPA use the T+12 settlement data to be consistent with the invoicing timelines currently used by other EIM Entities.

Invoicing from the T+12 settlement gives customers more time to research invoices and submit disputes based on the CAISO timelines. As BPA’s presentation points out, invoicing from T+55 would involve a several month time lag where adjustments may be needed due to resettlements and/or dispute resolution.<sup>2</sup> While BPA may consider this a more efficient<sup>3</sup> way to

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<sup>1</sup> The March Meeting slide deck (the “March Presentation”) asked for comments by April 12<sup>th</sup>, but because the next meeting is scheduled for April 10<sup>th</sup> BPA staff verbally asked that comments be submitted by March 24<sup>th</sup>, which was a Sunday.

<sup>2</sup> The March Presentation at 30 (“Invoice cannot be issued until approximately 3 months after the close of the trade month.”).

<sup>3</sup> *Id.* at 29.

handle its invoicing, any such adjustments will still need to be tracked and ultimately provided to customers.

Invoicing from the T+12 settlement data also appears to be consistent with other EIM Entities. At the March Meeting, BPA indicated that all of the other entities participating in the EIM that BPA has consulted with were using the T+12 settlement data. This is noted because BPA appears to favor invoicing from the T+55 settlement data. Although BPA is arguably unique, it would be helpful to customers to be able to see how the choices BPA will be making for EIM implementation compare with other active EIM Entities and to understand where variances, if any, are emerging.

**2. BPA Should Develop a Separate Matrix Summarizing EIM Entity Participation and Implementation Models**

At the March Meeting, BPA acknowledged that it has been consulting with other EIM Entities to better understand its implementation options and best practices; BPA should be as transparent as possible with these findings to assist customers in their evaluation of what BPA may propose, especially in instances where there is variance from what other active EIM Entities have implemented. While BPA has used other EIM Entities implementations to anecdotally explain certain choices that BPA will need to make throughout the monthly stakeholder meetings, that information has not consistently been provided or documented and will become increasingly difficult to keep track of as the EIM process continues. Because many of these decisions will not be made until the BP-22 and TC-22 processes, Avangrid kindly asks that BPA create a separate matrix to summarize trends and identify outliers with respect to EIM participation models, i.e. Invoicing Timelines, etc. This will help stakeholders better understand and analyze the many choices the agency is addressing during the monthly meetings and should improve stakeholder engagement.

**3. BPA Should Provide its EIM Issues and Venues Matrix**

During each of the EIM Stakeholder Meetings to date, BPA has identified issues that the agency intends to resolve in separate processes or workshops. Several meetings ago, BPA committed to providing a “parking lot” list of these issues. At the March Meeting, BPA provided an example matrix, the EIM Issues and Venues Matrix, which will be included in its Letter to the Region this summer but did not provided its matrix to stakeholders because the agency was not able to identify when all of the issues would be addressed, i.e. during the BP-22 or TC-22 processes, via Business Practices, or otherwise. BPA should not wait to complete its EIM Issues and Venues Matrix before providing it to stakeholders. There is value in simply seeing the growing list of issues even if BPA is unsure about when or how they plan to address each item. As described above, this kind of information gets increasingly difficult to monitor as the EIM implementation process continues. The more transparency BPA can provide, including cumulatively, the better informed its stakeholders will be.

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Avangrid appreciates BPA’s review of these comments and consideration of the recommendations contained herein.