



*Energizing Life in Our Communities*

*February 12, 2021*

**Comments of Public Utility No. 1 of Snohomish County regarding Bonneville Power Administration's February 2, 2021 EIM Implementation Workshop**

*Submitted via email to [techforum@bpa.gov](mailto:techforum@bpa.gov)*

Public Utility District No. 1 of Snohomish County (Snohomish) appreciates Bonneville Power Administration (BPA) staff's continued engagement with customers relating to BPA's potential entrance into the Western Energy Imbalance Market (EIM). In particular, Snohomish thanks BPA staff for their responsiveness to feedback at the October 28, 2020 workshop requesting more information on customer impacts and implementation requirements. Snohomish found the February 2, 2021 workshop (February Workshop) very informative and offers the following comments for consideration.

**Settlements and Billing**

While Snohomish has been cautiously supportive of BPA's efforts to join the EIM, the actual financial impacts to BPA and to customers remains uncertain. It will be through EIM settlement statements and billing where the impact of BPA's participation will be actually felt. It is critical that BPA provide sufficient detail for customers to understand the relationship between BPA's and customers' activity and the various charges and credits they will face. Moreover, we understand that settlement statements in particular will contain a large volume of data that will require significant administrative effort for customers to process and validate. To the extent reasonable, BPA should help minimize customers' burden by rolling up the detailed data in a manner that aligns with customers' current business practices and providing the information in a format that can be imported into data management systems.

Snohomish is encouraged by BPA's sharing of early prototypes and openness to feedback. We are optimistic that BPA and customers will be able to reach agreement on the content, structure,

and format of the bills and settlement statements. To that end, we have three initial suggestions to help meet the goals discussed above:

- **On the bill show subtotals for load, for interchange, for each non-participating resource, and for each intrachange element.** Grouping in this manner should facilitate customers' internal and/or external accounting practices. For example, customers with separate internal accounts for individual resources, customers that may need to pass on charges and credits for specific resources to third parties associated with contracted sales, or customers that may need to link intrachange charges and credits with associated contracted purchases or sales may all benefit from this grouping.
- **On the detailed settlement statement, put each table in a separate file or separate worksheet.** This will help keep the data organized and structured, particularly for those customers who choose to import the data into data management systems or other software.
- **Resettlement data should be shown with the same granularity as original settlements.** The sample detailed settlement statement did not include resettlements, but Snohomish assumes that BPA would provide any resettlements with the same level of granularity as the original settlements.

Snohomish encourages BPA staff to continue to share sample bills and detailed settlement statements with customers as they are refined at future workshops. We may also have additional suggestions as we work through our own internal implementation process.

### **EIM Training**

Snohomish thanks BPA staff for sharing its plans for customer training. With respect to settlements training, it appears that customers may not be able to download test settlement data until the formal training in the January/February 2022 timeframe, approximately one month prior to the planned EIM go-live date (see February Workshop Slide 20). We anticipate that some customers, including Snohomish, may desire to import the detailed settlement data into internal data management systems in order to facilitate billing validation, improve scheduling practices in the new paradigm, review EIM impacts for future policy and rate case discussions, etc. One

month is a very tight window for customers to integrate this data into internal IT systems and **we request that BPA make test data available for download earlier, even in draft form.**

More broadly speaking, the only customer training plan presented appears to be around settlements. **Snohomish requests clarification as to whether settlements is the only area of training that BPA staff is planning, or whether we should expect to hear about additional training opportunities in future workshops.**

We certainly appreciate the importance of settlements training, but Snohomish also wants to ensure we are prepared for go-live operationally. For example, we note on the CAISO section of the EIM Program Roadmap (February Workshop Slide 8), there are a series of market readiness programs (Day in the Life, Market Simulation, and Parallel Operations) in the months building towards EIM go-live. **We encourage BPA to work with customers to develop a framework for customers to participate in these readiness programs to help prepare customers for what to expect and minimize unforeseen issues on March 3, 2022.**

### **Future workshop priorities**

Snohomish appreciates BPA sharing the planned topics for future workshops and the opportunity to provide feedback. We are interested and plan to engage in nearly all of topics listed. Priority items for Snohomish include:

- **Discussion of BPA's plans around VER forecasting and scheduling.** This is an important area for Snohomish as we develop new scheduling procedures due to the changing EIM timelines. We would appreciate an opportunity to provide input in advance of BPA completing its VER forecasting changes, scheduled for June 30 according to the EIM Program Roadmap.
- **Training, including operational training opportunities,** as discussed above.
- **Continued engagement on settlements,** as discussed above.
- **Discussion of dispute resolution timing.** We understand that if customers identify any issues with settlements or billing, we would work through BPA. If the underlying problem is due to a CAISO error, BPA would then engage in CAISO's dispute resolution

process on behalf of the customer. Snohomish would like to better understand this timeline and make sure that BPA's planned settlement and billing cadence will preserve the option for dispute resolution if necessary.

- **BPA's plans for post go-live reporting.** We expect that customers will have an opportunity to help shape what will be included in this reporting, so more than one workshop session may be required on this topic.

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Snohomish thanks BPA staff for hosting this workshop series and looks forward to continued engagement on implementation as we all prepare for BPA's potential entrance into the EIM next spring. Please don't hesitate to reach out if you have any questions.