

May 11, 2021

Via Electronic Submission

John Hairston
Administrator and Chief Executive Officer
Bonneville Power Administration
911 NE 11th Avenue
Portland, OR 97232

Re: April 27, 2021 Western EIM 2022 Implementation Workshop

Dear Administrator Hairston:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback regarding Bonneville Power Administration’s (“BPA” or “Agency”) April 27, 2021 Energy Imbalance Market (“EIM”) Implementation Workshop. AWEC acknowledges BPA’s continued engagement with stakeholders during Phase IV of the EIM Implementation process that will culminate in a decision by BPA regarding its participation in the EIM. This is clearly a momentous decision with many associated implementation elements to resolve, each of which will impact stakeholders to varying degrees. During the April 27th workshop, BPA Staff shared updates to its EIM Integrated Program Roadmap, customer impacts summaries, Variable Energy Resource forecasting, and Western EIM Governance. The topic of Post Go Live EIM Reporting was reserved for future discussion. AWEC will provide comments on this topic once the discussion of Post Go Live EIM Reporting has taken place.

In response to stakeholder comments, the Agency has adjusted the stakeholder response deadline regarding the Draft Phase V document. BPA proposes to provide stakeholders with an additional three days to respond. Notably, two of these days include the weekend. AWEC appreciates BPA’s efforts to find more time on the back end of EIM Implementation process so that stakeholders may effectively respond to the Draft Phase V document. However, AWEC suggests additional consideration be given to when the Agency begins the Phase V process.

Currently, the Phase V process is slated to begin serially upon conclusion of the BP-22/TC-22 proceedings in July. BPA should consider moving into business practice development and an expanded Phase V process earlier than currently proposed if at all possible. Engaging in the Phase V process earlier will provide BPA and the region with the necessary time to adequately discuss critical Phase V and business practice elements.

Additionally, during the April 27th workshop there was substantial discussion regarding what might happen when BPA is not in the EIM market, either in the period before “Go Live” or if there was a market separation event. This discussion was thought-provoking and



raises concerns. It appears there is a lack of clarity regarding when certain data requirements and rate applications will begin or end for non-federal resources. As such, AWEC requests that BPA schedule a discussion of these topics at a future workshop to ensure that AWEC members with non-participating, non-federal resources have a better understanding of expectations going forward.

/s/ John Carr
Executive Director
Alliance of Western Energy Consumers