

June 2, 2021

***Via Electronic Submission***

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

**Re: May 19, 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”) May 19, 2021 Energy Imbalance Market (“EIM”) Implementation Workshop. AWEC acknowledges BPA’s ongoing engagement in the EIM Implementation discussions. It is necessary that both BPA and stakeholders recognize the importance of these discussions and the upcoming BPA decision on whether to enter the EIM as an EIM Entity. Should BPA decide to become an EIM Entity, the Agency should regularly reevaluate this decision to ensure that continued participation provides net positive benefits for BPA’s customers. These decisions hinge on variety of factors, notably, the financial benefit of participation in the EIM market.

Stakeholders have requested that BPA provide monthly post Go-Live reporting updates on the benefits realized through EIM participation. During the May 19<sup>th</sup> Workshop, BPA agreed 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.”<sup>1/</sup> AWEC concurs that an issue this important should not be limited to consideration at a single workshop, particularly since the comments of customers at the May 19<sup>th</sup> Workshop revealed that BPA and customers may have different ideas about what the reporting should look like. For example, BPA shared with stakeholders that it envisions providing quarterly updates on BPA’s market participation and experience that could include quarterly benefits for *all* EIM participants. Further, BPA might provide information on BPA’s EIM projects, how BPA groups are adapting to EIM participation, and how possible market changes or initiatives could impact EIM participation. However, at this time, BPA is *not* proposing to share its own specific, actual benefit levels on a monthly or quarterly basis. It is AWEC’s understanding that this critical information might only be shared during the biennial pre-rate case process as a part of its net secondary revenue calculations. This proposal is concerning and merits reconsideration by BPA.

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<sup>1/</sup> Bonneville Power Administration, Western EIM 2022 Implementation Workshop, at 41 (Mat 19, 2021).

Going forward, it is essential that BPA demonstrate to customers and stakeholders that EIM participation is providing verifiable benefits that outweigh the costs. It is further necessary that BPA track its performance in this market relative to EIM performance goals. Without this level of transparency, it is unclear whether BPA will be able to meet its EIM participation principles. Specifically, EIM participation principle 4: Bonneville's participation is consistent with a sound business rationale, and EIM participation principle 5: Bonneville's participation is consistent with the objectives of Bonneville's Strategic Plan. AWEC supports Public Power Council's comments on this topic and urges BPA to reconsider what is possible given stakeholder comments.

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