

October 21, 2020

Via Electronic Submission

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

Re: October 7, 2020 Supplemental TC-22/BP-22/EIM Phase III 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”) October 7, 2020 Supplemental TC-22/BP-22/EIM Phase III workshop presentation. Below, AWEC addresses Transmission General Rate Schedule Payments (“GRSP”) for EIM and Generation Inputs.

Transmission GRSP for EIM and Generation Inputs

EIM Rate Schedule Language

BPA Staff revised the existing EIM rate schedule language used by other entities in order to ensure the rate schedules will align with BPA’s unique position if the Agency ultimately joins the EIM. Specifically, BPA is proposing changes to Existing Schedules 4 and 9, and new Schedule provisions to implement EIM Cost allocation among BPAT Transmission customers.

For Generator Imbalance Service, Schedule 9E, BPA proposes to include with the definition of Instructed Imbalance Energy (“IIE”) the following proposed language for Intrachange Imbalance: 1) Calculation of Intrachange Imbalance – FMM-IIE; 2) Calculation of Intrachange Imbalance – RTD-IIE, and 3) Adjustment to IIE Settlement for Resources that Supply Energy for an Intrachange. The Intrachange Imbalance will be a voluntary option and requires both parties’ agreement for participation. The Intrachange Imbalance is designed to assign IIE credits and debits from resource to load.

BPA is proposing this “Intrachange Imbalance” as a special treatment for Non-Participating Resources serving load within the BPA balancing authority (when the load does not own the resource). AWEC’s understanding is that this may provide such loads with an incentive to schedule these resources to load more accurately by reassigning costs/credits for resource changes that occur after T-57. According to BPA Staff, additional details regarding this option

will be defined in future business practice development process. AWEC looks forward to these discussions to ensure that this option will be available for our members and their specific load-resource arrangements, should our members wish to elect to participate.

Generation Inputs Rate Schedule Language

BPA proposed changes to Variable Energy Resource Balancing Service (“VERBS”), Persistent Deviation (“PD”), and Intentional Deviation (“ID”). Although BPA proposes these changes in order to accommodate EIM participation, they will apply both when BPA is in and out of the EIM. BPA Staff proposes two components—Regulation and Non-Regulation—to the VERBS rate and the elimination of VER scheduling elections, thus using Forecast scheduling only.

According to BPA Staff, the changes to the ID language are designed to “[m]easure ID based on the hourly forecast and account for schedule changes made after T-57 [and] [e]xclude market dispatches from the measurement of Station Control Error.”^{1/} BPA Staff proposes to move PD “into its own rate schedule provision consistent with other penalty rates.”^{2/} According to BPA Staff, the proposed language changes are “designed to accommodate schedule changes after T-57 [and] [will] limit[] the application of PD to only the UIE portion of EI and GI.”^{3/} AWEC understands that the proposed GRSP updates conform with BPA’s recommended retention of the PD and ID elements of its existing rate structure with adjustments in order to align with the EIM. AWEC reiterates its prior comments that ID and PD are unnecessary in the EIM paradigm.

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

^{1/} Bonneville Power Administration, TC-22, BP-22 and EIM Phase III Customer Workshop at Slide 115 (Sep. 29, 2020).

^{2/} Id. at 118.

^{3/} Id.