



May 12, 2020

*Via Electronic Submission*

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

**Re: April 28, 2020 TC-22/BP-22/EIM Phase III Workshop**

Dear Administrator Mainzer:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback regarding Bonneville Power Administration’s (“BPA or “Agency”) April 28, 2020 TC-22/BP-22/EIM Phase III workshop. Below, AWEC addresses April 28, 2020 workshop topics including the most recent scheduling update and proposed workplan for the EIM process, EIM Charge Code Allocation, BP-20 Gen Inputs Settlement Closeout (Solar Study), Creditworthiness, and BPA’s proposed approach for reviewing Tariff language.

*Schedule Update and Proposed Workplan*

AWEC appreciates BPA’s willingness to maintain the existing collaborative approach to conducting the EIM/TC-22/BP-22 process, with some possible additional meetings needed in September. With the retention of this approach, AWEC believes stakeholders will provide better informed feedback as the region grapples with the implementation details of BPA’s possible entrance to the EIM.

Further, the opportunity to see a more detailed workplan that addresses EIM implementation details and includes discussion of topics previously addressed throughout the EIM/TC-22/BP-22 process will provide stakeholders with a complete picture of BPA’s goals moving forward. However, the workplan no longer seems to include work on 7(f) options or follow-up to AWEC’s request to explore contractual solutions under the grandfathered Green Exception. If 7(f) options and contractual solutions under the grandfathered Green Exception are no longer part of the current process, AWEC respectfully requests a discussion regarding next steps to resolve the 7(f) options and contractual solutions under the grandfathered Green Exception.

### EIM Charge Code Allocation

In the April 28<sup>th</sup> EIM Charge Code Allocation discussion BPA asserted that it is now proposing to move down the path of a partial sub-allocation of charge codes and will do so in a phased-in approach. AWEC supports these initial decisions and continues to believe that there may be merit in targeting an eventual FERC-approved sub-allocation model through phasing in charges over the next several rate periods.

As highlighted in the April 28<sup>th</sup> workshop discussion, there remain many details to resolve before stakeholders have a complete understanding of how the proposed BPA partial sub-allocation aligns with cost causation or avoids cost shifts. In particular, we echo comments made during the April 28<sup>th</sup> workshop and want to ensure that both the set of charge codes selected, and the rate design proposed, do not have unintended consequences. AWEC looks forward to additional discussion of rate design options to address these next level implementation details so that we may analytically assess impacts to our members. Without more details regarding rate design options we can only offer generalized, qualitative feedback.

### BP-20 Gen Inputs Settlement Closeout (Solar Study)

AWEC appreciates BPA staff time spent on exploring the costs and impacts to holding reserves in a non-flat shape. BPA's decision to no longer pursue this issue further at this time is understandable. However, we may request to revisit this issue in the future if circumstances materially change and a different outcome becomes feasible.

### Creditworthiness

Generally speaking, AWEC supports aligning BPA structures with the FERC pro forma approach to minimize unnecessary differences between BPA's and FERC-jurisdictional Transmission Providers' Tariffs.

### Review Tariff language approach

AWEC appreciates the opportunity to provide input and discuss BPA's proposed approach towards reviewing Tariff language for TC-22 workshops. BPA's proposed approach has two broad parts. First, BPA will provide applicable redlines that are based on PGE's EIM-related tariff language for sections discussed at specific workshops. Second, BPA will provide a comprehensive redline of the proposed Tariff at the conclusion of the workshop process. This proposed approach provides stakeholders with the opportunity to provide necessary input. However, there is a possibility that all interrelated topics may not be scheduled for discussion during a single workshop. As a result, the TC-22 workshops may present an incomplete picture of how possible solutions would be codified in the Tariff. Further, presenting highly related topics together will avoid having a partial display of Tariff edits.



**AWEC**

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*/s/ John Carr*

Executive Director

Alliance of Western Energy Consumers