

June 2, 2020

RE: Comments on Bonneville's May 19, 2020 BP-22/TC-22/EIM Phase III Workshop

Powerex appreciates Bonneville staff's continued efforts to engage its stakeholders on important topics for the upcoming rate and tariff proceedings, and Powerex offers the following comments in response to the recent workshop topics.

Southern Intertie Studies

Bonneville has outlined two alternatives for consideration, given the unique complexities of Bonneville's Southern Intertie and difficulties that would be encountered for significant expansions of those facilities. In Alternative 1, Bonneville would study upgrades to the Southern Intertie in its discretion, and in Alternative 2, Bonneville would study upgrades at the request of the eligible customer. Under both alternatives Powerex understands that Transmission Service Requests (TSRs) on the interties will remain in queue in the Study state until ATC becomes available. As stated in its March 31, 2020 comments, Powerex does not oppose either alternative as both allow for TSRs to remain in the queue in a study state.

EIM Tariff Language

Powerex appreciates Bonneville's initial efforts to provide redlined revisions to the OATT for EIM participation. With many of the proposed provisions in the OATT still under review, Powerex encourages Bonneville to continue to provide initial draft language for stakeholder feedback and further examination as various provisions become available. Powerex will provide further comments as that tariff language becomes defined.

At the April 28, 2020 workshop, Bonneville presented two alternatives to allow for EIM participants to enter into service agreements. Alternative 1 suggested that Bonneville create a separate service agreement to facilitate this arrangement. Alternative 2 suggested revisions to the firm PTP service agreement template, Attachment A to Bonneville's tariff. Under Alternative 2, Bonneville suggested that the Attachment A be revised to accommodate an effective date of the service agreement for entities that become customers solely to participate in the EIM and who would not take (or pay) for transmission service.

Powerex supports Alternative 1, where Bonneville creates a separate service agreement. Powerex is concerned with Alternative 2 which uses Attachment A to facilitate this, given that various clauses in Attachment A are applicable to firm PTP customers and not to an entity that is only an EIM participant. Powerex requests that Bonneville provide additional clarification around why Attachment A is being considered to develop a contractual relationship with EIM participants or with entities that have Participating Resources instead of a separate service agreement. Powerex understands that other EIM entities have required the execution of a



service agreement to establish the necessary contractual relationship with EIM participants, but have not done so through firm point-to-point service agreements.¹

Powerex is generally supportive of the other suggested modifications to Attachment A, as outlined in Bonneville's presentation, to allow for electronic signatures and notifications, as well as minor amendments to fix any inconsistent numbering.

Sincerely,

Raj Hundal
Market Policy and Practices Manager

¹ See, e.g., *PacifiCorp*, Filing for Revisions to the OATT to Implement the Energy Imbalance Market at 65, Docket No. ER14-1578 (Mar. 25, 2014); *NV Energy*, Amendments to the NV Energy Open Access Transmission Tariff to Participate in the Energy Imbalance Market at 50, ER15-1196 (May 5, 2015); *Arizona Public Service Co.*, Amendments to Open Access Transmission Tariff to Participate in the Energy Imbalance Market at 33, Docket No. ER16-938 (Feb. 12, 2016).; *Puget Sound Energy, Inc.*, Amendments to the Puget Sound Energy, Inc. Open Access Transmission Tariff to Facilitate Energy into the Energy Imbalance Market at 19-20, Docket No. ER16- (Feb. 10, 2016) (requiring a non-firm PTP service agreement); *Portland General Electric Co.*, Amendments to the Portland General Electric Company Open Access Transmission Tariff to Facilitate Energy into the Energy Imbalance Market at 16, Docket No. ER16- (Mar. 1, 2017).