



**TC-22, BP-22 and EIM Phase III Customer Workshop**  
**Comments/Questions/Issues List**  
May, 12 2020

Renewable Northwest (RNW) appreciates the opportunity to provide these comments and questions related to BPA's April 28th presentation on its future implementation of the Energy Imbalance Market (EIM). RNW sees the potential for immense benefits to the region of an expanded EIM, especially with respect to the footprint diversity benefits of balancing load and renewable resource variability over a larger area. EIM participation should provide both financial and renewable integration benefits to the region and to BPA and its customers. Given the strong shift underway by Northwest states and their individual utilities to expand use of clean low cost renewable generation in order to effect carbon reduction, it is important that BPA's implementation of the EIM not result in a negative financial impact on existing or future wind and solar resources. But some of the materials BPA has presented at its EIM stakeholder meetings seem to suggest that the current EIM scheduling rules implementation could have negative financial impacts on renewable energy producers. We want to work with BPA and other stakeholders to ensure this is not the outcome of BPA's EIM implementation. Simply put, EIM implementation must support the Northwest's shift to low carbon resources. Renewable energy producers and advocates alike are relying on BPA to facilitate a transition to EIM operations that enhance our energy future.

Renewable Northwest is working to better understand the differences between the EIM scheduling requirements and BPA's existing scheduling protocols for VERs, and how BPA's implementation of the EIM will impact VERs. We want to understand the financial impacts, especially as they relate to integration services and balancing reserve costs. BPA has presented information that shows that the current VERs scheduling does not align with the scheduling requirements of the CAISO EIM.

We have the questions below following up on BPA's April 28th presentation and hope you may be able to address them in the May 12 Customer Led Workshop or future meetings. In addition, we have included other more general questions and comments on the EIM.

**Questions:**

- It would be helpful for BPA to provide more analysis of the financial impacts of changing the scheduling practices will have on renewables generators taking integration services in its BA.
- Slide 47: Will the EIM scheduling changes impact all VERs or only those currently using BPA's 30/60 and 30/15 scheduling? Do these impacts apply to all VERs in BPA's BA or only those participating in the EIM?
- Slide 48: How do the 5 minute updated dispatches for VERs intersect with the rest of the EIM scheduling?

- Slide 51: Can BPA walk us through the details of this graphic again so we can better understand it?
- Slide 52: This slide states the within hour variability is not moved out of BPA's BA. Is it possible VEs scheduling could remain the same if BPA is able to manage the within hour variability?
- Slide 53: Can BPA provide more details on how other EIM entities are managing the within hour variability of VEs while participating in the EIM? Have their protocols resulted in negative financial impacts to VEs? If not, how have they been able to avoid this?
- Slide 57: Can BPA provide more details on why only interchange rights holders should be allowed to donate transmission for the EIM? Will other entities need to acquire new transmission rights to participate in the EIM?
- Slide 35-37: Can BPA provide more information about how the method of allocating costs based on measured demand ensures that costs are allocated commensurate with benefits or based on cost causation?
- Renewable Northwest believes there can be positive benefits from allowing flexible loads to participate in the EIM. Has BPA considered this and what would be needed to in BPA's EIM implementation for these resources to participate?

**Allocation of costs:**

Given the complexity of moving to partial sub-allocation of EIM costs at the outset, and the fact that BPA will not have experience or data to model allocation of those costs ahead of time, there is the potential for costs to be allocated inappropriately. No sub-allocation would be a better place to start and then BPA can work to understand and model partial and possibly later full sub-allocation in a way that ensures cost causers and beneficiaries are paying their fair share.

Respectfully submitted on behalf of Renewable Northwest,

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