



Customer Group

Slice Customer Group Comments on Bonneville Power Administration's July 28, 29 & 30, 2020 TC-22, BP-22 and EIM Phase III Workshop

The Slice Customer Group appreciates the opportunity to provide comments on Bonneville Power Administration's (Bonneville) July 28, 29 & 30, 2020 TC-22, BP-22 and EIM Phase III Workshop. Below are a few comments on select topics.

1. Off-the-Top Non-Regulation Reserves: The Slice Customer Group supports *Off-the-Top Option 1* for BP-22 (see *TC-22, BP-22 and EIM Phase III Customer Workshop – July 29 & 30, 2020 Day 2 and 3* presentation; slides 92-96). Given the uncertainty associated with impacts of Bonneville participating in the EIM, we suggest an explicit evaluation of impacts and reconsideration of options as part of planning for BP-24. We look forward to continued discussion of the details associated with apportioning costs and benefits of EIM participation between deployment of balancing reserves and non-slice resources.
2. Energy Imbalance Penalty Bands: The Slice Customer Group supports *Alternative 3: Remove Existing EI/GI Deviation Bands* (see *TC-22, BP-22 and EIM Phase III Customer Workshop – July 28, 2020* presentation; slides 74-77). We believe that under the EIM construct, penalty bands are no longer necessary to incentivize the desired planning and scheduling behavior. Further, removal of the bands would mitigate the impact to customers of the potential implementation of an earlier scheduling deadline than exists today.
3. Persistent and Intentional Deviations: The Slice Customer Group does not support *Alternative 1: Status Quo: Keep the ID and PD penalties* (see *TC-22, BP-22 and EIM Phase III Customer Workshop – July 28, 2020* presentation; slides 78-86). We are open to Alternatives 2 and 3 to remove or modify the penalties. We recognize the details of the modification alternative are still being developed and we look forward to engaging in their development and evaluation.

The Slice Customer Group consists of:

Benton PUD; Clark Public Utilities; Clatskanie PUD; Cowlitz PUD; Emerald PUD; Eugene Water and Electric Board; Franklin PUD; Grays Harbor PUD; Idaho Falls; Lewis PUD; Pacific PUD; Snohomish PUD; Tacoma Power.