



November 10, 2020

Re: NIPPC Comments to EIM Implementation Kick-Off

Thank you for the opportunity to provide these comments.

Business Practice Timeline

The October 28 workshop focused on BPA's work plan to update its internal systems and processes in preparation for joining the Energy Imbalance Market. During the workshop, NIPPC requested a timeline for development of the business practices that will be needed to implement the customer facing elements of these updated systems and processes. NIPPC understands that any initial timeline will need to be updated over time. Nevertheless, NIPPC requests a time frame for the beginning and conclusion of the business practice implementation process. NIPPC also requests that BPA begin development of a detailed timeline specifying the specific business practices that must be drafted or revised for implementation of the EIM. Customers will need this information in order to manage their own resources in order to ensure that the business practice development process identifies as many of the potential BPA/customer interface issues as possible before BPA goes live with the EIM.

BPA should also consider customers' requirements to modify their own internal processes and systems. While some of these adjustments may be able to proceed in parallel with BPA as more information becomes available, NIPPC cautions BPA that its internal timeline for business practice and development should take customers' needs into account. Just as BPA can not begin development of its business practice processes until many the underlying tariff issues are resolved, many customers can not begin to modify their own billing review processes until BPA's business practices are finalized. Accordingly, NIPPC urges BPA to complete its business practice development timeline well before EIM "go live" so that customers have the opportunity to adjust their own internal processes. Potential issues include billing disputes, as well as the process for transmission donation.

Responsibility for Delays

NIPPC understands that the CAISO invoicing process is complicated; NIPPC also understands that the error and dispute resolution processes at the CAISO have strict timelines. NIPPC is concerned that a delay by BPA in processing CAISO charges may negate a customer's opportunity to report errors or dispute charges to CAISO. During the business practice development process, BPA should provide customers (especially non-Participating Resources) with a clear understanding of the process through which non-Participating Resources must use to clarify or dispute EIM charges. BPA should also clarify the extent to which it will hold customers harmless for its own errors or delays in forwarding EIM charges to customers.

Prototype Invoice

NIPPC encourages BPA to provide customers as soon as possible with a prototype invoice showing EIM charges with explanations of the source of each charge (i.e. direct assignment or allocation).