

July 8, 2020

Via Email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

**Comments of Idaho Power Company and PacifiCorp Regarding Bonneville Power Administration's TC-22, BP-22, and EIM Phase III Workshop (held June 23-24, 2020)**

Idaho Power Company ("Idaho Power") and PacifiCorp ("Joint Parties") appreciate the opportunity to comment on Bonneville Power Administration's ("BPA") June 23-24, 2020 workshops. As EIM Entities, the Joint Parties submit these comments on several of the topics discussed in the workshops regarding the Energy Imbalance Market ("EIM").

**I. BPA's Process for Interchange Rights Holder Donation of Transmission to the EIM**

In the June 23 presentation, BPA discussed the potential deadline for a customer who is donating transmission to the EIM to tag its donation.<sup>1</sup> It appears BPA is proposing that each customer who is donating transmission would separately tag the donated transmission, and each tag would separately get updated after-the-hour with the results of the market dispatch.

As EIM Entities adjacent to BPA, the Joint Parties urge BPA to proceed cautiously when considering a transmission donation process that allows Interchange Rights Holders to donate transmission using separate e-Tags on a single interchange path with an adjacent EIM Entity. Having multiple dynamic ETSR tags from BPA to an adjacent EIM Entity's point, which are updated after-the-fact, would be unmanageable due to the volume of tags. The Joint Parties suggest that BPA should aggregate all the transmission donations on each path into one import dynamic ETSR tag and one export tag. Managing multiple dynamic ETSR tags in each direction would be unnecessarily complicated.

**II. Base Schedule Submission Deadline**

In the June 23 presentation, BPA discussed the deadline for base schedule submissions.<sup>2</sup> BPA discussed that EIM Entities to-date have adopted, in their tariffs, a base schedule submission deadline of T-57. BPA also discussed the pros and cons of it adopting a different submission deadline of T-50.<sup>3</sup> Ultimately BPA asked whether there was a compelling reason to adopt T-50 instead of the status quo of T-57.<sup>4</sup>

The Joint Parties appreciate BPA's thoughtful examination of the pros and cons and strongly encourage BPA to adopt the status quo base schedule submission deadline (T-57). The status quo would not create operational seams issues with adjacent EIM Entities and, crucially, would ensure consistent settlement data across EIM Entities.

Conversely, and as BPA acknowledges, if BPA were to adopt a base schedule submission deadline of T-50, the difference in deadlines between BPA and adjacent EIM Entities would create significant operational and settlements seams issues. The base schedules between BPA and adjacent EIM Entities

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<sup>1</sup> BPA's June 23 Presentation at 91-97, <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/23June20%20-%20Main%20Tarrif-Rates-EIM%20Workshop.pdf>.

<sup>2</sup> *Id.* at 98-113.

<sup>3</sup> *Id.* at 109-112.

<sup>4</sup> *Id.* at 112.

would not match, which would result in the adjacent EIM Entities becoming unbalanced and needing to take other actions to balance by T-40.

Further, CAISO determines imbalances from the base schedules, so wheeling customers would have different imbalance calculations across entities based on the timing of when the base schedules are submitted. You may have one side of the wheel-through submitting the base schedule at T-57 versus the other side of the wheel-through submitting at T-50. For example, consider an e-Tag submitted at T-55 that wheeled across Idaho Power's system and BPA's, into PacifiCorp-West. Idaho Power would not have submitted the e-Tag in their base schedules at T-57, but BPA would have been able to include the e-Tag in its base schedule submission. The imbalance assessed to the e-Tag by CAISO would be different for Idaho Power compared to BPA, thus customers' statements from the various transmission providers could be very difficult to reconcile. In order for settlements to be applied consistently and accurately, base schedule submission timelines should align with all adjacent EIM Entities.

For these reasons, the Joint Parties strongly encourage BPA to adopt the status quo T-57 deadline for base schedule submissions.

### **III. Conclusion**

The Joint Parties thank BPA for the opportunity to comment and for its consideration of this feedback.