



Energizing Life in Our Communities

July 1, 2021

Comments of Public Utility No. 1 of Snohomish County regarding Bonneville Power Administration's June 17, 2021 EIM Implementation Workshop

Submitted via email to techforum@bpa.gov

Public Utility District No. 1 of Snohomish County (Snohomish) appreciates Bonneville Power Administration (BPA) hosting this workshop series on EIM Implementation. Snohomish found the entire series, including the June 17, 2021 workshop (June Workshop) to be very informative. We offer the following comments for consideration on topics covered at the June Workshop.

Comment Review

Snohomish thanks BPA for adding the comment review section at the beginning of each workshop and has found it helpful in tracking issues throughout this series. In particular, Snohomish appreciates BPA taking the time to respond to customer concerns around post-go-live data reporting and transparency.

Snohomish is wholly supportive of PPC's comments requesting additional commitments from BPA on data reporting and transparency beyond what is included in the CAISO benefits report ahead of BPA's final determination in Phase V whether to join the EIM next Spring. In addition to the points raised by PPC, Snohomish notes that many of the responses in the Comment Review state that a certain metric would be a good candidate for pre-rate/tariff case workshops. Snohomish agrees that these topics should be included in pre-rate case workshops, but that is not a substitute for ongoing reporting. Many of the requested reporting metrics are related to shorter term BPA operational decisions that have direct customer impacts, and upon which customers may have interest in providing input earlier than the next pre-rate case workshops. For example, the estimated impact of EIM participation on BPA's ACS emissions value could impact the calculated carbon content of customers' power supply, and BPA's approach to passing the

resource sufficiency balancing test and the corresponding results would impact customers' exposure to over/under scheduling penalties.

Snohomish understands BPA's difficulty in committing to specific metrics ahead of EIM participation but hopes that BPA will accept PPC's offer to jointly explore these issues in advance of the letter to the region. Snohomish staff stands ready to participate in any such efforts.

EIM Real-Time Operations

Snohomish appreciates the discussion on market isolation and other potential mitigating actions provided during the EIM Real-Time Operations section and looks forward to learning more through the upcoming business practice process.

Snohomish notes that this discussion focused on temporary market isolation on the operational timeframe. Snohomish would also like to better understand any potential process for BPA terminating participation in the EIM, as described in Attachment Q, Section 10.2 of the proposed TC-22 tariff revisions. A key part of the risk mitigation of BPA joining EIM is the voluntary nature of market and the ability to exit the market if things aren't going well or if more beneficial market opportunities arise. Given the significance of such a decision and its impact on customers (who may have differing views on a potential exit), Snohomish believes BPA should establish the process it would take to exit the EIM ahead of joining the EIM, perhaps during the upcoming business practice process or as part of the Phase V Letter to the Region. This could include:

- The conditions that could lead to BPA considering exiting the EIM
- How the process to consider exiting would be initiated
- Commitment to customer input around exiting
- Expected time to make the determination to exit and to implement the exit
- Notice provided to customers of an exit

EIM Settlements

June 2021 EIM Settlements Prototype

Snohomish appreciates BPA's responsiveness to our comments following the prior settlements discussions, including moving each table into its own worksheet. The sample settlement statement shared at the June meeting appears to be a marked improvement over the prior version.

We have a few additional questions and suggestions for BPA's consideration. In addition to the specific items noted below, it would generally be helpful to see column definitions/descriptions and more complete examples across the rows so we can fully understand exactly how each charge/credit would be calculated.

- Charge Code 6046: it would be helpful to see exactly how BPA hourly metered load, customer hourly metered load, and customer hourly imbalance roll up to the daily values. Would BPA be able to provide an example that shows the hourly details for a day that the customer is eligible to receive a share of the credit and for a day that the customer is not eligible to receive a share of the credit.
- Non-Participating Resources (NPRs)
 - The NPR tables contain charge code 64600 which has 15-minute granularity and codes 64750 and 64700 which have 5-minute granularity. Accordingly, the rows are listed in 5-minute increments. Snohomish would like to understand how the 15-minute data would be shown across the three corresponding 5-minute intervals to ensure we would not be "triple charged" (or triple credited) for that 15-minute imbalance. Snohomish requests that BPA provide an example that contains 15-minute imbalance to demonstrate how this would work. A potential alternative resolution could be to move code 64600 to its own worksheet.
 - Snohomish would also like to understand the meaning of the three "expected energy quantity" columns (E-G) and would like to see examples that show how these three values interact with the base schedule (H) and meter read (D) values to produce allocated imbalance quantities (J, M, Q). Ideally, BPA could provide an example of an NPR that is subject to all three imbalance charge codes for the same interval.

- Snohomish would like BPA to explain the meaning of the Contingency Reserve Delivery flag (P) and how it relates to generation imbalance.
- Interties
 - We understand that BPA proposes to include all interties in the same table. This works for Snohomish, but we request that the Intertie Name be listed in each row of column A (and not only the first row), which will enable customers to sort or filter on this value.
 - As with the NPR tables, it is unclear how 15-minute imbalance will be mapped onto 5-minute rows; a relevant example would be helpful.
 - Snohomish appreciates BPA providing a mapping of tags to interties. To the extent possible, it would be helpful to also provide the imbalance associated with each individual tag, not just the aggregated intertie.
- Intrachange
 - Snohomish would like to better understand how intrachange settlements will be demonstrated for both the customer that owns the source resource and the load customer. Please confirm our understanding from the Customer Impact Summary that there would be three charges/credits associated with an intrachange transaction:
 1. The source resource would be assessed IIE on the NPR portion of the statement as usual;
 2. The source resource would receive an offsetting charge/credit on the intrachange portion of the statement in the *opposite* direction from the original charge/credit from #1;
 3. The load customer would then also receive a charge or credit on the intrachange portion of the statement in the same amount and *same* direction as the original charge/credit from #1.
 - An example showing how generator imbalance and intrachange imbalance would be settled for both the source generator and for the load customer would be very helpful.

- We request that each individual intrachange transaction be listed separately and not rolled up into overall hourly amounts for all transactions. In addition, we request that the intrachange table include columns indicating the relevant counterparty and source resource to help customers validate these settlement values.
- According to the Customer Impact Summary, intrachange could be assessed as either FMM IIE (64600), RTD IIE (64700), or both. However the example worksheet only includes charge code 64700. Is BPA planning on including both codes on this worksheet?
- The sample settlement sheet includes hourly values for intrachange. Is BPA planning on including 5-minute or 15-minute data associated with intrachange?
- Please confirm our understanding that intrachange could also be associated with interchange, in which case “source resource” would be replaced with “import” and/or “load” would be replaced with “export” in the questions above.

Dispute Timeline

The Dispute Timeline is very useful in understanding the relationship between the release of CAISO settlement statements and dispute deadlines, BPA’s EIM billing cycle, and BPA’s proposed timeline for customer disputes with CAISO.

- We suggest that BPA add to this chart the dates when BPA would release the weekly settlement statements to customers associated with the T+9B (noted on the timeline as 1/14 2021) and T+70B (4/13/21) CAISO statements.
- We note that the first BPA deadline for customer disputes (5/4/21) is *after* CAISO’s T+9B dispute deadline (2/17/21) and ahead of the T+70B dispute deadline (5/13/21). Snohomish requests confirmation that with that 5/4/21 deadline customers would still be able to dispute items from the T+9B statement and not only incremental changes on the T+70B statement.
- We also would like to ensure that the BPA settlement statement associated with the CAISO T+70B statement would be issued to customers with sufficient time for

customers to review and raise issues with any incremental changes on the T+70B statement ahead of BPA's proposed deadline.

- BPA should eventually provide similar information associated with each of the CAISO resettlement statement dates (e.g., T+11M). Should we expect to see this information in the business practice process?

Settlements API

Snohomish appreciates BPA's consideration of our prior request to provide API access to EIM settlements info. To reiterate, an API would facilitate customers' ability to import settlements data into our internal systems to help automate validation, which will be important given the expected volume of EIM settlements data.

EIM Testing

Snohomish appreciates BPA providing the information on BPA and customer involvement in various testing phases leading up to full EIM participation. Can BPA indicate how and during which phases Slice customers should expect to engage in testing?

EIM Training

Snohomish thanks BPA for sharing its settlements training timeline, which states that a customer review of generic EIM-S bills will occur in October/November 2021. Will generic EIM *settlement statements* also be available for review at this time?

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Snohomish thanks BPA staff for hosting this workshop series and looks forward to continued engagement on implementation as we all prepare for BPA's potential entrance into the EIM next spring. Please don't hesitate to reach out if you have any questions.