

March 30, 2021

*Via Electronic Submission*

John Hairston  
Administrator and Chief Executive Officer  
Bonneville Power Administration  
911 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

**Re: March 16, 2021 Western EIM 2022 Implementation Workshop**

Dear Administrator Hairston:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback regarding Bonneville Power Administration’s (“BPA” or “Agency”) March 16, 2021 Energy Imbalance Market (“EIM”) Implementation Kickoff workshop. BPA’s ongoing dedication to transparency with customers throughout the EIM process is evident and AWEC appreciates the Agency’s continued communication with stakeholders.

During the March 16<sup>th</sup> workshop, BPA presented customers with an overview of its plans to consider a refresh of its business case to “inform whether benefits justified EIM-related costs.”<sup>1/</sup> The timing proposed for this consideration and resulting lack of time made available for meaningful stakeholder engagement is concerning. BPA Staff presented an approach wherein it will evaluate whether there are “material” changes in four key areas that are “reasonably expected to change the business decision to join the EIM”<sup>2/</sup> in July of 2021. Then, if there are changes that could result in a different decision, a reassessment of the EIM participation business case will be pursued. A summary of the evaluation will be included in the draft close-out letter that is anticipated to be released August 2, 2021 for an 18-day comment period.

First, it is difficult to understand how BPA will know whether to revisit the business case based on reasonably expecting the business case to change a decision without some additional analysis and business case updating. Second, the presented timeline does not allow stakeholders time to provide input on the evaluation or any update to the business case before the results are captured in the draft close-out letter. AWEC believes this study is an important process step in BPA’s consideration of joining the EIM and should therefore be given a serious refresh, in particular after its discussion in the BP-22 rate case. Should BPA enter the EIM, this analysis has the potential to be a guidepost for measuring success in the EIM in the future. As such, this analysis should be updated with more current information if applicable. The

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<sup>1/</sup> Bonneville Power Administration, EIM Implementation Workshop, at 43 (March 16, 2021).

<sup>2/</sup> Id.



discussion at the March 16<sup>th</sup> workshop suggested that BPA's determination of what might constitute a material change in underlying fundamentals may not match stakeholders' determination. AWEC asks that BPA reconsider its approach to the business case refresh.

AWEC appreciates the ongoing dialogue regarding the EIM process, and anticipates further comments as technical issues continue to be further developed.

*/s/ John Carr*  
Executive Director  
Alliance of Western Energy Consumers