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WEIM



2022

NOVEMBER 17 WORKSHOP RESPONSES

Jan. 11, 2021

COMMENTS

Topic	Comment Summary	BPA Response
Settlements	On the mapping of BPA's tie points: how many pricing points and will BPA be providing that mapping to us?	BPA will have an LMP for each modeled BA to BA interchange settlement point each of which can be composed of multiple tie points. The list will be provided sometime during the parallel operations period.
Settlements	Will BPA provide the nodal names for EIM?	The EIM pricing nodes for generation, load and interchange will be captured and shared with customers sometime during the parallel operations period.
Settlements	Can BPA provide example bills for us?	BPA has posted an example bill on BPA's website under the Nov. 17 EIM Implementation Workshop materials. BPA will continue to refresh that example in customer workshops and intends to post examples of each bill type in the Jan. 27 EIM Implementation workshop. BPA will not provide customer specific example bills because of the resources and time required.
Settlements	Can BPA provide the most recent version of the data spreadsheet with the underlying settlements data? Even though it is not final yet, a more recent copy would help customers prepare.	BPA has posted the latest version of the detailed data file format on BPA's website under the Nov. 17 EIM Implementation Workshop materials, but this is not the final version. The latest version of the detailed data file format includes two new columns on the "Other EIM Charges" tab (Column D: "Export ATF Tag Quantity/priExportATFTagQty/(MWh)" and Column E: "Meter Read/priMeterQty/(MW).") BPA is working with our vendor on an estimate when the final version of the data file will be available.

COMMENTS

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Settlements	Will BPA give a grace period for payment for the first few bills, considering the timelines will be tight in receiving data and understanding our bills?	BPA acknowledges customers' interest in mitigating for the delayed timeline and is evaluating options. All of these options will need to consider the stated billing parameters in BPA's Business Practices, Tariff and Rates.
Settlements	I think it would be helpful if at all possible to get end to end testing for customers that schedule in particular where we can see the changes and see how they show up in settlements statement, some kind of structured testing scenario would be helpful	BPA is currently completing the necessary integrations and calculations to enable go live and is not in a position to offer end to end testing, or structured scenarios for any customer at this time.
Settlements	At the November Workshop, BPA staff indicated that EIM Entity customers can have access to CAISO's CMRI portal. We believe that some information available in CMRI will be useful in our shadow settlement validation. Our understanding is that CMRI access is through the EIM Entity. We request that BPA provide timely information on this process in order to facilitate our validation development.	BPA supports enabling transmission customer access to their relevant data in CAISO's CMRI system. BPA is working with CAISO on processes and timelines to enable this access consistent with CAISO's adopted policy.
Agency Enterprise Portal (AEP)	Can BPA make an API available to customers to access the Agency Enterprise Portal to download settlement data?	When the Agency Enterprise Portal (AEP) goes live it will not include a customer API to download settlement data. At this time, in order for a customer to get data from AEP, the customer will need to sign an Access Use Agreement and manage their own users' access to AEP. Customers will have to log into AEP to get settlement data.

COMMENTS

Topic	Comment Summary	BPA Response
EIM Reporting	<p>In the Final EIM Close-out Letter, BPA stated that it intends to engage with customers and constituents in a report-out development process which “will involve an iterative process of proposals and customer feedback.” It is Snohomish’s expectation that the reporting discussion at the November Workshop was the start of that iterative process to develop EIM reporting metrics and the plan laid out does not represent a final determination by BPA.</p>	<p>This is correct. BPA will continue to engage stakeholders as it develops the external reporting.</p>
EIM Reporting	<p>Snohomish appreciates BPA’s commitment to pursue more frequent reporting on its ACS emissions factor than annually. Snohomish understands that BPA intends to pursue this reporting outside of the scope of EIM reporting because some factors related to ACS reporting may be outside of the scope of BPA’s EIM participation. Snohomish requests BPA include in that reporting an assessment of how BPA’s EIM participation, including decisions to allow its generation to be deemed delivered to California, has impacted BPA’s ASC emissions factor.</p>	<p>Thank you for the feedback. BPA has decided to change its proposed approach and will include the topic of EIM impacts to the BPA System carbon emission rate within this stakeholder forum until a permanent forum is identified. The specific scope and content of this reporting will be developed within Phase 2 (ready for BP-26) through ongoing stakeholder engagement. It is anticipated that this reporting will transition to a different forum as BPA engages with customers on broader regional carbon issues and regulation.</p>

COMMENTS

Topic	Comment Summary	BPA Response
EIM Reporting	<p>The impact of BPA’s EIM participation on its system mix continues to be important to PPC members. Our understanding based on the last workshop is that BPA will not plan to track and report impacts to BPA’s system mix as part of its ongoing EIM reporting, but that it will find another forum to share this analysis. We look forward to more information on where system mix impacts will be provided. The specific forum for this discussion should be established prior to BPA’s participation in the EIM, as should some of the specific metrics that will be used to report out on these impacts.</p>	<p>Thank you for the feedback. BPA has decided to change its proposed approach and will include the topic of EIM impacts to the BPA System carbon emission rate within this stakeholder forum until a permanent forum is identified. The specific scope and content of this reporting will be developed within Phase 2 (ready for BP-26) through ongoing stakeholder engagement. It is anticipated that this reporting will transition to a different forum as BPA engages with customers on broader regional carbon issues and regulation.</p>
EIM Reporting	<p>Snohomish recognizes that there may be other considerations, such as forecast accuracy, that might lead BPA to choose not to balance to the CAISO forecast and fully supports BPA as the best party to make that determination on an hour-by-hour basis. That said, transparency in this topic is of interest to Snohomish as a scheduling customer with potential exposure to an allocation of any over- or under-scheduling penalties. Snohomish fully intends to schedule to its own best forecast, but like any other utility will face load forecast error. Whether or not Snohomish is penalized for such error is in part a function of which forecast BPA chooses for the balancing test.</p>	<p>While the entire BA may be exposed to over/under scheduling penalties, only those LSEs whose schedules are off in the direction of the BA’s balancing failure will be allocated a portion of the BA’s penalty if applied. Each customer’s detailed data file will contain information on Balancing Test Pass/Fail needed to validate bills and any over/under scheduling penalties. Customers can use this information to determine the impacts, if any, of BPA’s choices with respect to the balancing test.</p>

COMMENTS

Topic	Comment Summary	BPA Response
EIM Reporting	<p>BPA cited CAISO’s new RSE report as a potential source of information. Snohomish has reviewed this report, which contains useful information. However, it appears to focus on the flexible ramping sufficiency test and the bid range capacity test, with no information on the balancing test. Snohomish appreciates BPA’s willingness to provide the frequency of passing the RS balancing test among the Phase 1 metrics. Snohomish suggests BPA also consider providing information about the accuracy of the BPA forecast relative to the CAISO forecast, or frequency that BPA chooses to utilize the CAISO forecast. This information would be particularly useful context during periods BPA has a large number of balancing test failures.</p>	<p>BPA will provide summary data on BA scheduling error and the frequency with which the CAISO BA forecast was targeted on a quarterly basis. Scheduling error will be measured against either 1) the CAISO BA forecast and/or 2) actual load. BPA will be collecting and sharing data on how the BA did as a whole with every entity scheduling to their own best forecast.</p>
EIM Reporting	<p>Snohomish appreciates BPA’s willingness to eventually report on charge code allocations and transmission donations. Snohomish understands that it may take some time to develop ongoing reporting metrics around these items. However, Snohomish also views both of these items as important inputs into rate design and policy decisions that BPA and/or customers may wish to reevaluate for BP-24. Snohomish requests that if BPA is not able to implement ongoing reporting on these items ahead of BP-24, that it provide as much information as practicable during the pre-rate case workshops. Snohomish understands that this data will represent a very limited duration of BPA’s initial EIM participation. However, even data from a limited time period may shed light on an issue that may be important to address earlier than BP-26.</p>	<p>It is BPA's intent to share this information in a timely manner. BPA will make the reporting related to charge code allocations and transmission donations available as early as practical. However, given the timeline needed for meaningful data and analysis, BPA is committing to develop the Phase 2 metrics by the start of BP-26 at the latest. In addition, customers with OASIS access will be able to view transmission donations for EIM transfers on BPA’s OASIS through a simple query. Such donations will be made consistent with the timelines set in BPA's Tariff and Business Practices.</p>

COMMENTS

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EIM Reporting	<p>BPA explains that it does not plan on developing a comparison of prices for the Load Aggregate Point/Locational Marginal Price to Mid-C index to identify the impact on ancillary service prices. While we understand that BPA does not plan to report this on a regular basis, we continue to believe that this information could be helpful in assessing how the changes made to BPA’s ancillary services rates to facilitate its EIM participation are impacting customers. If this comparison is not included as part of a regular report out on BPA’s EIM participation, it should be discussed as part of pre-rate case workshops to better inform whether additional tweaks to the ancillary service rate design are needed.</p>	<p>As shared in the November 17th presentation, information on Load Aggregation Point (LAP), Locational Marginal Price (LMP) and Mid-C index prices is publically available information. LAP and LMP information can be found on CAISO’s OASIS site.</p>
EIM Reporting	<p>PPC understands the challenge of reporting on ongoing EIM participation costs once that work is incorporated into ongoing work in both business lines; however, it will be important to have a sense of those costs to understand the cost/benefit trade-offs of participating in the EIM. At the November workshop, BPA staff stated that the current “ongoing cost” estimate was a fairly good approximation of the ongoing costs going forward. BPA should review the estimated costs during the pre-rate case workshops for BP-24, and for future rate cases, to determine if the stated estimate continues to be a good estimate of costs in the future.</p>	<p>This topic will be addressed in pre-rate case workshops when it is timely, which may be in BP-24 or BP-26. The timing of the discussion is dependent on availability of meaningful data.</p>

COMMENTS

Topic	Comment Summary	BPA Response
EIM Reporting	<p>PPC is disappointed that BPA will not develop specific metrics of success in the EIM, nor metrics to guide when the agency should exit the market. As recommended in PPC’s comments on BPA’s EIM close-out letter submitted on August 23, 2021: "BPA should not shy away from establishing success criteria for fear that stakeholders will demand withdrawal from the EIM after short periods without optimal results. To the contrary, without clear goalposts on what the agency views as success, it may be quite challenging to assess whether participation is successful." Additional experience in the market may help better inform potential metrics and we hope BPA will reconsider this decision after it gains experience in the EIM.</p>	<p>As stated in the EIM Close-out letter at page 53, "While Bonneville agrees with the development of metrics for continued monitoring of its EIM participation, Bonneville does not believe establishing a set of specific evaluation criteria or metrics is prudent at this time. Through participation, Bonneville will learn where operational benefits are realized. Creation of a set of specific criteria or metrics at this time, as requested, could lead to stakeholders focusing only on those specific criteria and not considering costs and benefits of market participation as a whole. As an EIM Entity, Bonneville will consider how the EIM is helping Bonneville to maintain the operational integrity of the system versus the ongoing costs of processes and systems necessary to enable EIM participation. Likewise, as a Participating Resource, Bonneville will consider the marketing and operational benefits of participating versus the ongoing costs of participating, including lost opportunity costs. Bonneville has already committed to sharing the CAISO quarterly benefits analysis. Also, it is worth noting that the costs and benefits to Bonneville as an EIM Entity and Participating Resource will fluctuate over time."</p>

COMMENTS

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EIM Reporting	<p>The November presentation referenced that these metrics may not be available until BP-26. This timing would be unfortunate as these metrics would be very helpful in ensuring that changes in rates design, adopted by BPA to facilitate its EIM participation, are functioning as intended – assigning costs consistent with cost-causation principles and incenting desired customer behavior. We encourage BPA to make as much information as possible in advance of the BP-24 and BP-26 rate case discussions. We understand this information will be limited, particularly for the pre-rate case workshops for BP-24, but it will still better inform rate design than if that information was not available.</p>	<p>This topic will be addressed in pre-rate case workshops when it is timely, which may be in BP-24 or BP-26. The timing of the discussion is dependent on availability of meaningful data.</p>

RESPONSES

Question	BPA Response
<p>On Dec 1, BPA was planning to transition from CAISO’s “map” environment to the “stage” environment where some LMPs might start printing (in non-binding, sandbox fashion). Did that occur?</p>	<p>BPA initiated parallel operations with the CAISO on December 1 as planned. As part of this transition into CAISO's "stage" environment, Transmission customers that have access to CAISO's stage environment OASIS are able to see published non-binding LMPs.</p>
<p>We believe that BPA will use a single LMP on which to base the cost of ancillary services and losses. What is the name of that point?</p>	<p>All of BPA’s load based settlements will be based on the BPA ELAP (ELAP_BPAT-APND) which is a single consolidation of prices for the entire BAA. Generator based EIM settlements will be based on those specific generator LMPs.</p>

For more information,
visit www.bpa.gov/goto/eim.

