



*Energizing Life in Our Communities*

*February 11, 2022*

**Comments of Public Utility No. 1 of Snohomish County regarding Bonneville Power Administration's January 27, 2022 EIM Implementation Workshop**

*Submitted via email to [techforum@bpa.gov](mailto:techforum@bpa.gov)*

Public Utility District No. 1 of Snohomish County (Snohomish) thanks Bonneville Power Administration (BPA) for hosting the January 27, 2022 workshop (January Workshop) on EIM Implementation. Continued communication between BPA and customers is critical as we collectively prepare for BPA's entrance into the EIM. We offer the following comments for consideration on select topics covered at the January Workshop.

**Opportunities Presented by Delay**

Snohomish appreciates BPA making the difficult decision to delay go-live by two months. We know that staff across the agency has been very hard at work on implementation. This brief delay will provide additional time for BPA and customers to prepare for a smooth launch, hopefully setting us all up for successful long-term participation in the EIM.

The delay in the go-live date is an opportunity for BPA and its customers to fully develop the processes needed to be successful, including those related to suballocation and customer settlements. While we understand the complexity of the many moving pieces BPA is responsible for, we would appreciate an updated timeline for EIM customer settlements development work, including:

- Release of a finalized sample detailed data file ahead of go-live. This is needed for customers to develop the capability to import into customer data systems and for customers to verify the accuracy of any formulas.
- Release of a detailed data file containing customer-specific information based on parallel operations data ahead of go-live, if possible. This would help customers confirm our

understanding of how EIM settlements will apply to our individual systems, and allow us to validate that correct data sources are being used as inputs.

- Confirmation that detailed data files containing production EIM suballocation settlement info will be complete and available to customers ~2 weeks after go-live.

An updated settlements timeline will help us all to be more successful in completing our preparations go-live.

Throughout the Implementation Workshops, including in comments following the November Workshop, we have requested that BPA engage in additional testing with customers. In a response posted on January 11, 2021, BPA stated that it is not in a position to offer customer testing at this time. With the delay, we reiterate our request that BPA provide customers with testing opportunities to verify that customer schedule and meter data is flowing correctly to BPA and CAISO systems, and that accurate imbalance MW and settlement amounts are flowing back from CAISO, through BPA, to the EIM suballocation detailed data statements that BPA will be providing to customers. We feel this is especially important in light of recent metering issues. Ideally this testing would allow BPA, customers, and/or CAISO to identify and resolve any discrepancies or other errors before BPA joins the EIM.

### **CMRI Access**

In the January 11 response to customer comments, BPA stated that it is working with CAISO on processes and timelines to enable access to CMRI. We appreciate BPA's efforts on this item and request that BPA provide a progress update, including an expected date that access will be made available in order for customers to plan further development of validation systems.

### **EIM Reporting**

Snohomish appreciates BPA's responsiveness to customer feedback on its EIM reporting plan, including adding summary data on BA scheduling error and forecast usage to its Phase 1 Metrics and adding information on EIM impacts to BPA's system carbon emission rate to its Phase 2. We believe these items will help customers better understand the overall impacts of BPA's EIM participation Metrics. After go-live, we encourage BPA to work to accelerate the release of Phase 1 and Phase 2 metrics ahead of stated deadlines to the extent possible.

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Snohomish thanks BPA staff for their efforts on EIM implementation and communication with customers. We look forward to continued engagement in the coming months leading to a successful EIM go-live on May 3! Please don't hesitate to reach out if you have any questions.