BONNEVILLE POWER ADMINISTRATION

Energy Efficiency Post-2011
Phase 2

Workgroup 1 Meeting 3

August 17, 2010
9:00am to Noon
PNGC Power

Overview

- The group continued discussing how the "common pool," where unspent or relinquished EEI funds go to be redistributed to other customers, should function.
- The group came up with the following proposal:
  - At the beginning of each rate period, a customer would send a letter to BPA indicating how much of their EEI they plan to spend during that rate period. If the customer indicates it does not plan to spend all of its EEI funds in that rate period, those dollars would be put into the "common pool." By notifying BPA at such an early date, the customer will be high in the priority queue for accessing common pool dollars in the future (this is intended to incentivize customers to let BPA know as early as possible if they won't be able to spend all their EEI funds so the funds can be used to obtain conservation in other service territories).
  - Because customers will need to submit invoices to receive EEI reimbursements from BPA, BPA can gauge on an ongoing basis if and how customers are spending their EEI.
  - Half way through the rate period, EERs will work in collaboration with customers to determine their anticipated level of spending for the remaining of the rate period. (This is primarily geared for customers that are 'under spending' their EEI at the half-way point.) At that time, customers will provide another letter to BPA to indicate how much of its EEI it plans to spend in the remaining part of the rate period. Again, if a customer does not plan to spend all of its remaining EEI, that money will go into the common pool. Again, the customer would receive high priority in the queue for accessing funds in future rate periods.
  - At any point throughout the rate period, customers have the ability to give up EEI they don't plan to spend, or alternatively request common pool EEI.
  - If a customer does not spend its EEI and does not make it available to the common pool in a timely manner (i.e., within the first 18 months of a rate period), the customer would be unable to access its full TOCA share of EEI during the next rate period. This is intended to encourage customers to spend their EEI or make it available to other customers in a timeframe that allows them to spend it. Reducing a customer's future share of EEI would occur only in very specific and limited circumstances, such as the

customer did not spend or commit any of its EEI and did not make any available to other customers.

- The group then began discussing how common pool EEI funds can be accessed.
  - We brainstormed 3 approaches for creating queue priority: (1) first come, first served; (2) available to large projects (large being relative to customer's EEI); (3) customers who released their unspent EEI early in a rate period have higher queue priority.
  - We brainstormed different ways EEI can be distributed and on what basis (i.e., the "rules" or "prerequisites"):
    - In all cases, the customer must demonstrate a need for common pool funds (i.e., a project proposal, on pace for spending current EEI, etc.)
    - Should there be a limit on how frequently one particular customer can access common pool funds? Put another way, if 2 customers are accessing common pool funds, and one customer has never asked for common pool funds and the other customer receives common pool funds on a regular basis, should the former have priority over the latter?
    - Should a customer be required to self-fund 25% kWh savings before it can access common pool funds in order to incentivize self-funding? What does this mean for smaller customers who may rely solely on BPA funding? Should small/rural/residential customers be exempt from the self-funding requirement or meet some other percentage requirement?
    - How often should common pool funds be distributed and the queue reset? Quarterly?
    - Should funds be distributed on a project by project basis?
    - Should we try to ensure an equitable distribution of common pool funds?
    - The customer should be "on track" to spend its EEI funds -- how is "on track" determined?
    - What type of documentation requirement is needed from a utility to demonstration a need for additional EEI funds?
    - Should some portion of the common pool funds be set aside for large or special projects or some other purpose?
    - Should there be a maximum amount of EEI funds a customer can take from the common pool (assuming other utilities are also trying to access the common pool)?
    - Should customers be guaranteed access to their TOCA share of the common pool, at a minimum?
  - Some participants expressed the desire for certainty when it comes to knowing how much common pool EEI will be available to each customer.
- We agreed to think over how to access common pool dollars and begin the next workgroup discussing this topic.

Decision/Action Items

- BPA staff will develop and distribute a think piece on parameters related to how/when unspent EEI funds are collected and put in the common pool.
- BPA staff also will develop and distribute a think piece on how common pool EEI funds can be accessed. There was a request for a visual portraying the options.
- BPA staff to present the industrial definition for large projects and the option of progress payments.
- The group will continue to think about how common pool dollars should be accessed. One threshold question pertaining to the distribution of funds is how important is equity versus the need.
- Continue to work with the SRR Workgroup to develop the utility pool concept.

Meeting Notes[1]

Facilitators:
Megan Stratman, NRU
Margaret Lewis, BPA

BPA Participants:
Rasa Keanini
Josh Warner
Kyna Powers
Matt Tidwell

1. MS: Recap of Meeting 2: BPA's financial restrictions regarding not being able to roll over funds from one rate period to the next. Can't earmark unspent EEI dollars to be reallocated back to the EEI in the next rate period. So, still trying to figure out how to smooth out the bumpiness of conservation availability. One option is a "utility pool." We heard from this group that this approach might be best for smaller utilities. Also heard that others, like I-937s might also be interested in such a utility pool. We sent this issue over to the SRR workgroup to discuss. There was a meeting and then a subgroup meeting to discuss. Since then, NRU and OMECA staffs have put together a think piece. If and when that workgroup comes up with a proposal, we'll bring it back to this group to discuss.
    a. The "common pool" was the other pool suggestion. If one utility or a pool of utilities are unable to spend their EEI dollars, how can those dollars be made available to other utilities/pools. There's the suggestion of a queue, staggered check-ins, etc. We had a good brainstorming session last time, but no clear direction of where we're going, so we should discuss this again today to try to anPerson Ber how left over EEI dollars can be spent in one rate period.
2. Person A: when we talk about pooling are we talking about three pools?

[1] Due to privacy concerns, only BPA staff and workgroup co-chairs are listed in these meeting notes.

3. MS: at the get go everyone gets their money; you could get it yourself and spend it, or be apart of a utility pool. If a pool or a utility doesn't spend their funds, this unspent EEI funding needs to be made available to other utilities/pools.
4. KP: how do we incentivize other utilities/pools to make their funds available if they know they can't spend it.
5. Person B: I submitted a proposal, had four parts:
    a. Utilities will have budgets and if the budgets are equal to the EEI funds, they get the whole amount; if the budget is less or if the utility does not spend all their budget, then the EEI funding would be adjusted.
    b. The only issue unresolved is for utilities that want more than their EEI budget.
    c. Utilities can certainly pool, and I don't see why BPA would need to be involved with that.
    d. Pooling is a risk tactic for small utilities, but it's really between utilities.
    e. If a utility doesn't pass a budget that requires all their EEI funding, then the funding goes back into a common pool.
6. KP: don't know if BPA wants to get involved with having utilities bring their budgets to BPA.
7. Person B: budgets are important, once a budget is passed then that's how they can get the funds.
8. Person C: our budgets are approved on an annual basis, even if we were inclined to stipulate our budget, we would not be able to make that commitment over two years. We not only market our program and try to reach out to our members, but we respond to their needs as well. So one year might require a larger portion, but in another rate period, so there are a lot of variables that might make this approach problematic.
9. Person B: when this happens, you make a budget adjustment.
10. Person C: yes, but we don't have to indicate this to others outside the utility.
11. Person B: if there's no assurance a utility will spend their funds, BPA and other utilities want "unspent" funds to be spent before the very last minute, e.g. the last few months of a rate period. There is a certain amount of budgeting that could be done over two years. If everybody wants control of the money to very last minute, the money never gets reallocated.
12. Person D: I see this as a start-up issue rather than what happens four or five years down the road, so the question is what do we do during the transition phase.
13. Person B: if your entire budget is 100k and then a big project comes up, this will always be a problem for smaller utilities not just a transitional issue.
14. Person D: I know under CNRD, we had to sign some agreement or letter that said we wanted the CNRD and rate credit and were going to spend it, and if BPA wanted something like that we do something like that; we go ahead and submit something with a statement that says: "utility has budgeted this money and fully intends to use it all during the rate period."
15. Person B: or not and then that money would go back to other people.
16. MS: what I'm hearing is one approach, "front end" approach and then could have check-ins along the way. Front-end approach is a good one to have on the table.

17. Person D: in terms of the utilities, we should look at it more in terms of not necessarily of I have this pot of money for this two years and if I don't get the money spent then the money is going away. If I have a project out there that is 1 million and will go over rate periods, there needs to be a way for me to account for this between the two rate periods.
18. KP: on our end, the money from the first period goes away and then the funds from the next rate period is used to pay for the project.
19. Person B: ETO has a "committed process" where dollars are not allowed to be spent if a project committed. For a big project, once it's committed, it's basically spent.
20. KP: this is the difference between accrual accounting and what BPA does.
21. Person B: couldn't that money be spent to the utility?
22. Person D: BPA would know that there are certain projects that are pending, so when you get to the next rate period, you would say okay that 1 million dollars wasn't spent last time, so…
23. JW: BPA can commit to paying, but dollars can't be carried over. You could commit but the funds have to be spent during the rate periods.
24. Person B: let's say this utility commits to this 1 million project toward the end of a rate period, the utility has some sort of account where it can take the money, it has the money, it turns out that it's not going to be spent; it's still the utility's money as long as there is the commitment. There could be some controls on this. But the commitment should allow the utility to keep the funds in its "account."
25. JW: there is the reimbursement process, an earmarking, but this earmarking goes away at a certain period.
26. KP: when we pay an invoice, we're paying it out of the funds from that rate period.
27. JW: we very infrequently pay progress payments.
28. Person E: Maybe could BPA entertain having "upfront" payment become more standard for big projects?
29. ML: there is something of this sort under the ESI program, i.e. "progress payments." But these are only for very large industrial projects.
30. Person E: it seems that BPA could set up a process that is more automated with clear rules about when progress payments could be paid.
31. JW: this is a good idea. We'll look into these current rules and see about changing them to make them more automated.
32. Person B: and BPA could have rules in place to get the money back if the money is not spent.
33. MS: but then the question is could BPA ask for money back from rate period one when it's already rate period two.
34. KP: the money is for a specific amount of kwhs so if they don't materialize there would be some sort of repayment.
35. Person D: Even with progress payments, there's still going to be a problem with getting all the money out the door. With ECA dollars…I think BPA could take care of this by making the budget for a utility larger during the next rate period.
36. KP: we run the risk of having to raise rates, if everyone budgets high and then spends the money.

37. JW: moving forward, everyone is going to have their allocations, which is different from today. The new EEI will limit our ability to move money around, i.e. cross subsidization. This is what we heard during Phase 1. This is why the pooling idea might allow this to work.
38. Person D: I think the pooling idea is a good one, but the problem will be to get utilities to join the pools.
39. JW: going back to the utility pool, having the utility pools be voluntary is a good idea. Our interest is making sure the dollars are spent to achieve savings and we want to make sure mechanisms are in place to move dollars around in case they aren't spent. It's been our experience that there is lumpiness, so mechanisms will likely be needed.
40. Person F: what's a typical year like now? Do all the EE dollars get spent.
41. KP: historically, no we haven't spent all the capital budget, but this year we're spending about twice what was budgeted. So we're seeing utilities spending more, which is why we get worried about utilities budgeting more and then spending it.
42. Person C: we need to bias more toward what happens without a decrement. Historical is not very accurate predication given the decrement.
43. KP: we can't always say there will be that flexibility to spend more than our budget.
44. KP: the Fish and Wildlife part of the agency has a similar problem; if they're not spending the money in one rate period and need it in another rate period, they ask for it in rates, but we're trying to be sensitive to this that utilities don't want funds to be collected twice. It's capital so some of it is collected twice.
45. Person D: we shouldn't lose sight of the fact there are other incentives for the utilities to spend their EEI allocation, e.g. accounting for conservation in the load forecast. This is going to be an extra incentive to go and get as much conservation as possible to go into rate cases and say that their HWM should be reduced because of conservation. This incentivizes utilities doing as much as possible.
46. KP: we all agree that there are reasons to spend the funds. But we're still trying to figure out mechanisms to make sure a utility that has a big project can pay for it and a utility that can't spent their funds will make it available to the other utility.
47. MS: what about discussing more "staggered check-ins"?
48. Person A: I like Person B's idea of the front-end approach. For either case, a utility that wants more or a utility that gives some of their funds to the common pool, there has to be check-ins.
49. Person D: There's an automatic check-in because utilities have to invoice BPA.
50. KP: having check-ins is great, and maybe there's a way to encourage a utility to up-front give up funds that won't be spent, maybe that utility would be at the front of the line during the next rate period, ie. To be first in line during the next period.
51. Person B: a great idea.
52. Person A: there's no advantage to budgeting all of it if you know you're not going to spend it cause you're still not going to be able to spend it.
53. Person E: a letter upfront and a midterm check-in would suffice.
54. Person B: and the idea that if you don't take all your money, you're earlier in the queue for the next period.
55. Person E: is there anything in the ECA agreements that complicate this?

56. Person D: how do you see the ECAs fitting in?
57. JW: don't know if they complicate this. They may have to be slightly restructured, but my guess is you could make amendments with the dollars.
58. Person E: what happens if BPA has made a commitment for ECA dollars without knowing what their budgets are during those years?
59. KP: going back to the check-in, it seems like the front-end letter is a good idea and as a utility manages its budget, maybe people could come back whenever they want, rather than all at the same time. Money could be made available as the check-ins come in to BPA.
60. MS: invoicing would alert to having communication with a utility.
61. Person D: I think it's an EER job to watch over this, in terms of making sure and checking in with people to see if they need to readjust their budgets.
62. ML: there needs to be some stated check-in period.
63. JW: and some stated actions that would be taken.
64. Person D: what about the issue of someone who wants to hold out as long as possible. So do we need to set a period in time, e.g. six months before the end of the rate period, if those funds aren't spent you get your budgeted deducted during the next year's allocation. So there's a carrot and a stick.
65. KP: there's an order of magnitude, if needs to be fair not to take the funding away if something happens out of the control of the utility.
66. Person F: I would hate to see us get punished for things out of our control.
67. Person G: it always seems that I have more in pipeline than my budget, so I'm always going back to BPA to increase my budget. If we just look at invoices, we might be tracking everything that is happening.
68. Person H: is there an avenue for BPA to pick up a large project? We can't risk getting a project that is bigger than our budget and having to borrow from BPA and pay it back.
69. KP: this is where a utility pool would come in handy.
70. Person D: Person H said that he didn't want to be in a position to pay money back to BPA, but this won't be the case.
71. JW: (clarification regarding Person H's concern about losing funds)
72. KP: the intent was not to punish people for things they don't have control over. We want to work out here the rules.
73. Person D: we're concerned about somebody that is just sitting on their funds and not spending and has no prospects to spend, so we want to give an incentive to those utilities to give up their funds.
74. JW: I think it's important to have an incentive to give up funds as early as possible.
75. KP: it can be a combination of both positive and negative incentives.
76. Person A: if you gave it up and something came along, would you be able to get the funds back?
77. Person D: and what happens if there's no money in the common pool.
78. KP: maybe the priority for the common pool is for the people who gave up funds in that rate period to have first access.

79. Person D: maybe for somebody that gave up funds and if there's no funds in the common pool, then maybe we could pursue the "capital" route. If there's not a means to get the money back, then I'd be very reluctant to give the dollars up.
80. KP: it might be a good time to talk about the mechanisms for getting money from the common pool. Do big projects get it first, do people who gave it up first, get first access, etc. There are a lot of options.
81. MS: there's also the question of whether the 75/25 plays into who gets access to the common pool. To get access to have to spend some of your 25% self-funding?
82. JW: what do people think about having a self-funding requirement.
83. Person F: I don't like it, from a smaller utility perspective, because we don't do much self-funding.
84. KP: we'll be tracking savings, not dollars spent. We aren't going to be tracking the self-funding of dollars spent by a utility, only the savings, which are reported.
85. JW: we can make this as simple or complicated as we want.
86. Person D: the other way to do this is going on the idea that BPA and its reimbursements are not paying for admin and the utilities are covering the admin and we can just do away with this idea of 75/25 split.
87. KP: an alternative way is not to have any requirements and if BPA wasn't getting the conservation to meet the target, it would ask for more in rates.
88. JW: so, Person D, are you saying that BPA doesn't pay admin? You're assuming utilities are paying for admin costs that aren't accounted for.
89. Person C: I agree that utilities don't get credit for all that they're spending. We spend more than the allowance that BPA has given us. But there are utilities that would be devastated without the admin allowance.
90. Person F: if BPA's goal is spend the money and get savings, why can't the common pool be made available on a first-come first-serve basis?
91. Person D: for Washington utilities, under I-937 and if we talk about cross-subsidization and equity, I don't think other utilities should subsidize those state requirements.
92. MS: my personal concern is that utilities that are full requirement utilities will be disproportionately negatively affected if there's no incentive for self-funding.
93. JW: two quick things: 1) folks should assume that this meeting schedule is going to continue through October, as necessary; and 2) we're planning to have a midpoint meeting on Wednesday, September 8th in Portland (will have call-in number).

Break

1. MS: Meeting recap: there would be an up-front letter, funds would be released; BPA would monitor invoices and as time goes on, utilities can continue to release their funds as necessary; there would be a mandatory check-in; also discussion about if a utility hasn't spent its money before the rate period, there would be a negative incentive to be allocated less during the next rate period.
2. Person D: we just need to be clear on that last one if they don't turn in their money; we're talking about specific instances where there would be a penalty.
3. KP: is there a point in time, e.g. the 11th month of the second year and then you give up your money….would this be meaningless?

4. Person D: kind of depends on circumstances, if a project isn't able to finish its M&V before the end of the rate period, it should not be penalized if its only able to release their funds at the end of the rate period
5. MS: what approach do we want to take to on working out these details?
6. JW: I would offer that BPA could write something up and would add some of the details and thoughts and could be discussed. But if there's another way, we're open to that. Does it make sense to put the "straw proposal" to the group or to a subgroup of this workgroup. We'll just get it out to the group.
7. MS: okay, so BPA will put together a think piece and we can discuss during the next meeting.
8. JW: we're talking mainly about the "common pool."
9. Person I: if a utility uses more than its allocation, then what did we decide?
10. KP: need to discuss that, how does money come out of the pool.
11. MS: we've talked about if you put money into the queue that gives you priority. Other approaches or thoughts?
12. KP: also: first-come, first-serve; large-scale project preference; first to give up their funds
13. Person D: we do have a board to write all this down.
14. KP: I was thinking of large-scale in relation to a utility's EEI budget.
15. RK: what about repeat utilities; would they have to wait a specific period of time.
16. Person F: is this considering the 25% self-funding?
17. KP: proportionality concept, i.e. proportionate to your TOCA, as opposed to the first utility to ask getting all the funds in the common pool
18. JW: so you could prioritize in addition to first-come, first-serve.
19. RK: would we ever do it on a project-by-project basis?
20. Person D: so bring in your project.
21. KP: or rather than a TOCA basis, you fund whole projects.
22. Person B: one of the main reasons for doing non-standards is not having go do project-by-project, so there would be a real angst about doing it this way because there would be a hold up waiting for project approval, so could lead to fewer projects being done.
23. Person D: you could submit a project to the common pool, or you could fund it yourself.
24. JW: there is the expectation that there will be some utility self-funding, so this needs to be in the back of people's minds.
25. Person F: regarding large projects: are we talking about larger projects having priority?
26. KP: yes, that what I was intending.
27. MS: do we have an idea of "large."
28. KP: I was thinking in relation to a utility's TOCA budget.
29. JW: this would help deal with a small utility getting a large project.
30. RK: we have accessing the queue and rules of the queue, so we might want to differentiate between access and the rules
31. Brainstorming on white board:
    a. 1st to ask
    b. Facilitate large projects (in relation to EEI budget)

   c. Released EEI sooner in rate period means higher queue priority
   d. Frequency of access by one customer
   e. Acquire 25% “self-funded” kwh
   f. Proportionate to your TOCA, so more customers have access
   g. Frequency of distribution, e.g. monthly
   h. Project by project basis
32. There’s a difference between “accessing” the queue and the “rules of the queue”
33. Person F: maybe should label as prioritization within the queue vs. a prerequisite of accessing the queue
    a. So we’re just looking at prioritization as first-come, first serve; facilitate large projects and released EEI sooner in rate period gets higher priority in queue
34. JW: a prerequisite should be that you have to spend entire EEI budget, or be on track to spend it.
35. Person A: yes BPA wants to get this out and get the savings, but we heard lots during Phase 1 that we want it to be “equitable”, so this has be a piece of this.
36. KP: this goes to the rules of the queue.
37. Person D: you never know what you’re going to get, so most people try to make it as high as possible cause you’re going to get dinged, so at least with proportion to the TOCA, you know a utility is, for example, I’m entitled to 6% of the common pool.
38. MS: you could have it based on a quarterly assessment and if the common pool isn’t completely distributed, it rolls over to the next quarter.
39. JW: might want to start only during the 3rd quarter of the first year. It’s going to be a touchy thing to access whether a utility is “on track.”
40. KP: I’m not convinced that we have to monitor whether a utility is on track, cause they’ll get penalized if they sit on their funds and don’t release the funds.
41. Person D: going back to the issue of having certainty of what’s available to a utility. If there’s 20 million in the pot, I know I get 6%, if BPA comes back and says “now we have this large project” then my 6% of the 20 million is reduced. In terms of setting up the rules, prior to BPA releasing funds there would be some consideration of projects. Providing some certainty is the important thing here.
42. KP: there’s no certainty that you’ll get more than your original EEI TOCA budget, so that provides some certainty.
43. Person D: I think it’s important that there’s also some flexibility so large projects can get done; so balancing the certainty with the flexibility is the hard thing.
44. KP: so what about 20% available to special projects and for the utilities that gave up their funds first, then the 80% based on TOCA proportion.
45. RK: maybe you make it based on the common pool proportion,
46. Person D: what about no more than 25%, but no less than your TOCA?
47. Person F: maybe large projects get the top priority.
48. JW: one of the issues is going to be timing.
49. Person B: too much uncertainty and certainty is important to be able to tell the customer.
50. JW: there is the assumption that 25% will be self-funded. If a project is more than EEI allocation, there’s an assumption that the utility would self-fund.

51. Person J: when we talk about 25% of common pool, how are talking about that?
52. KP: we were talking about of the available common pool, 25% was just an example of a cap if other utilities are asking for dollars.
53. JW: it's only a restriction if there are more requests than there are available.
54. ML: there needs to be a demonstration of need.
55. Person D: (budgeting question)
56. KP: are there preferences? I'm hearing interest in availability for large projects and having an equitable basis for splitting up the common pool.
57. Person J: at least with the larger Washington utilities with the sheer volume they have to do, tells me that there will be at least one if not all asking for more money.
58. Person D: this goes to my concern about 25% self-funding.
59. JW: if everybody is spending their budget, there is no problem with equity. But the second level of equity is if dollars flow into the common pool, then should we be worried about equity again? The more we're worried about equity with this second level, the more complicated it's going to be.
60. Person D: I'd be less concerned about it if 25% self-funding occurred.
61. RK: you could make them spend anywhere from 5% to 25% self-funding to have access to the queue.
62. JW: this requirement would be a detriment to smaller utilities that don't generally self-fund.
63. MS: there could be exemptions for these utilities.
64. KP: so long as we find a reasonable exemption for large projects, or a requirement of kwhs saved, this would go a long way toward addressing this equity issue.
65. Person D: example of utility with a mine that is the vast majority of the utility's load.
66. MS: another way of getting at this concern is frequency of asking for common pool funding. If you keep asking for money each time, you should be self-funding, whereas a utility that never asks would get priority.
67. JW: there needs to be some "as available" provision.
68. KP: I'm hearing priority one is first to give up funds. The question is how we combine these rules and prerequisites.
69. JW: we should think about large project component, because the timing is really key.
70. RK: there is more risk with prioritization of large projects because what if you get money from the common pool for a large project but then don't spend it. Still stuck with the same problem as before.
71. Person J: if we have a large project and we're asking for funds for the next budget year and we're making a commitment to the customer is there some commitment by BPA that if you're in the pool, what type of commitment is there from BPA.
72. JW: there is no firm commitment because we don't know how many common pool dollars will be available. You'll have access to EEI dollars, but no guarantee about common pool dollars.
73. Person D: There's a lot here and I need to see some sort of road map/decision tree so we can figure out where we're going with this. I see this as possibly being a sticky area.

74. JW: BPA will put together a straw proposal, but one question is which is more important is equity or one that favors large projects.
75. KP: we could put together various proposals that favor one or the other.
76. Person A: the budgets haven't been set yet; is there a way large projects could be a separate line item in the budget.
77. JW: this would throw out the equity issue on the first level in terms of allocating based on the EEI. You could leave aside a certain % of the total budget for large projects but you run the risk of these not being spent and this isn't what we heard in Phase 1, i.e. equity being main issue.
78. Person D: SRR workgroup will deal with utility pooling for SRRs, but there is still the question of pooling in general.
79. JW: My understanding is that SRR would come up with a proposal and bring it back to this group. They are trying to come up with a concept that would work for everybody and then the proposal would come back to this workgroup.
80. Action Items
    a. BPA will come up with a straw proposal
    b. BPA will look into ESI progress payments
81. RK: we do have progress payments in the PTR and the conditions are known.