



Alliance of Western Energy Consumers ♦ 818 SW 3rd Avenue, #266 ♦ Portland, OR 97204 ♦ 971-544-7169 ♦ awec.solutions

March 1, 2024

Via Electronic Submission

Re: February 1, 2024, Day-Ahead Market Workshop

The Alliance of Western Energy Consumers (“AWEC”) welcomes the opportunity to provide comments regarding the Bonneville Power Administration’s (“BPA” or “Agency”) February 1, 2024, Day Ahead Market (“DAM”) workshop. AWEC continues to support BPA’s investigation of market participation, and appreciates the thoughtful and balanced approach taken by BPA Staff, as set out below.

Timeline and Process

In response to a number of developments, including adjustments to timelines related to both the EDAM and Markets + processes, BPA has proposed a new schedule that will provide the time and space to develop a robust business case and build regional support for any market that BPA decides to join. We believe that the newly proposed schedule is a prudent approach to the facts and circumstances surrounding this effort, and support BPA adding additional workshops as needed to address outstanding questions and concerns. BPA’s proposal to release a DAM policy letter in the near future, followed by additional workshops and public engagement prior to official agency action in the fall should effectively balance the need to support ongoing regional efforts, while also allowing the time and space to build a convincing business case for BPA’s ultimate decision on this matter. Additionally, given the number of ongoing processes still shaping the ultimate capabilities, governance, and economic viability of both EDAM and Markets +, BPA’s new timeline is prudent.

We support BPA’s ongoing engagement in both Markets + and EDAM processes. Critically, we encourage BPA to build a strong business case during the coming year that informs, and is informed by, parallel efforts including the Provider of Choice process and PRDM. Finally, AWEC is grateful that BPA has published and will continue to update the DAM public comment tracker. This tool will streamline customer engagement and permit more effective engagement with stakeholders.

Substantive Issues

AWEC believes that the draft evaluation principles well capture issues that must be fully investigated as part of BPA’s decision-making process. As noted by both customers and BPA Staff at the February 1 workshop, however, these principles must be interpreted broadly so that critical issues that are not specifically named in this list, but that may fall within buckets covered by the listed principles are not left out.



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Of the draft principles, we believe that Governance is particularly crucial where the EDAM is concerned. Governance issues have prevented serious consideration of a west-wide market for many years, and it remains a significant impediment today.

On the other hand, Markets+ appears to have fewer – or more manageable – governance issues, but we are concerned with the lack of certainty around the business case for this option, and we encourage BPA to use this coming year to develop a robust case for any potential market participation, particularly in light of utilities issuing their own decisions on which market to join and thus impacting market footprints.

AWEC looks forward to continuing this discussion during the upcoming workshops, and will provide further comments as this investigation continues.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers