

April 17, 2020

Via Electronic Submission

Elliot Mainzer
Administrator and Chief Executive Officer
Bonneville Power Administration
911 NE 11th Avenue
Portland, OR 97232

Re: April 10, 2020 TC-22/BP-22/EIM Phase III Alternative Proposed Timeline

Dear Administrator Mainzer:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback regarding Bonneville Power Administration’s (“BPA or “Agency”) April 10, 2020 TC-22/BP-22/EIM Phase III Alternative Proposed Timeline. Below, AWEC addresses BPA’s April 10th proposed timeline, provides suggestions for BPA to consider in the event the proposed timeline is adopted, and finally, provides alternatives to BPA’s April 10th proposed timeline. Generally, AWEC supports retaining the current existing proposed timeline for the TC-22/BP-22/EIM Phase III process.

BPA Proposed Timeline

In light of the difficult and unforeseeable times we have all found ourselves in, AWEC believes adhering to the current existing proposed timeline is the best option as we move through the TC-22/BP-22/EIM Phase III process. BPA’s existing process of monthly workshops, customer-led workshops and stakeholder comments has been extremely effective in providing a methodical approach for tackling complex topics and facilitating multiple paths for stakeholder input. BPA staff have done an excellent job of continuing to provide timely and useful information, and addressing customer questions and issues, even as the Region, like much of the country, has begun adjusting to new constraints on our ability to meet face to face. BPA and its staff have shown great willingness to work with their customers throughout the TC-22/BP-22/EIM process and improve transparency. Given the success of BPA’s current TC-22/BP-22/EIM process, AWEC supports retaining the current existing proposed timeline. While AWEC acknowledges that there may be some efficiency gains under the new proposal as BPA works through the interrelated and interdependent issues presented by EIM entry, a change in process as proposed in BPA’s April 10th workshop may erode the effectiveness of the overall process.

Reduction of Customer Input Opportunities

BPA's proposed April 10th timeline is likely to reduce customer input opportunities and capabilities. BPA proposes to explain its comprehensive straw proposal over a period of two days, July 21 and 22, 2020, which likely would provide only three months for customers to engage with BPA in order to address the complex interrelated issues inevitably contained in the straw proposal and provide feedback. Notably, in addition to the final straw proposal content, all unresolved issues and topics from ongoing processes would also need to be addressed during the three months.

A potential consequence of the April 10th proposed timeline is bias towards the presented straw proposal because the rate case materials need to be crafted to meet the rate case timelines. For example, customers with little time to provide input may be forced to work on recommendations regarding specific issues within the straw proposal without fully understanding how changes to one part of the proposal might cause unintended consequences in other areas. A rushed schedule may lead to good proposals being rejected because they could not be considered earlier, or to lower quality feedback generally. Neither of these outcomes would be in the interest of BPA or the Region.

Further, there is concern that some fundamental decisions may be made in good faith, but without stakeholder input, and these may later be irreversible prior to the rate case, simply because there is not sufficient time to remake the straw proposal, even if stakeholders present valid reasons that BPA should make different choices.

Finally, focusing on delivering redlines of GRSPs as a communication tool might not be the most useful way to communicate the straw proposal. While AWEC appreciates that these will be useful once we have moved past the straw proposal stage, we request that BPA staff focus on alternatives and examples as means to solicit meaningful input from stakeholders.

Alternatives

If BPA must halt the meeting schedule in order to develop a straw proposal, AWEC recommends it start this work in May and provide an update to stakeholders in June, as recommended by PPC, NRU, and others. This straw proposal update could take many forms, as AWEC and other stakeholders acknowledge that a full straw proposal may not be completed by mid-June. AWEC recommends sharing what is available at that time with possible alternatives and examples for stakeholders to review and comment on. In addition, AWEC offers the following approaches as possible alternatives to implementing this middle of the road path, in lieu of BPA's April 10th proposed timeline or retaining the current existing proposed timeline for the TC-22/BP-22/EIM Phase III process.



A. Subset Phases Approach

Rather than BPA working exclusively within the Agency for two months without stakeholder input in order to produce a large and potentially unwieldy straw proposal, one alternative for consideration is to identify several subsets of topics with strong interdependencies to tackle in separate phases. This recommendation was proposed by NRU during the recent teleconference on April 10th and AWEC supports further consideration of this idea. Such a process would allow BPA staff to focus on a more manageable set of issues over a shorter period of time and allow stakeholders to engage sooner on the next levels of discussions.

B. June Straw Proposal Outline

Communication between the Agency and stakeholders will drastically decrease if not cease altogether during the two months BPA plans to draft the straw proposal. Upon release of the straw proposal, it is possible that it will take significant time for stakeholders to initially comprehend and work through the comprehensive document. In order to decrease this effect, BPA should consider sharing an update on the structure or outline of the straw proposal in June. This would allow stakeholders to visualize and prepare for BPA's general direction, and provide feedback related to the structural issues that they might identify in the straw proposal. Further, providing stakeholders with the opportunity to comment on the June outline would streamline issues that may arise when the straw proposal is ultimately released in July.

Regardless of the alternative path BPA ultimately takes, it is vital that BPA provide customers with clear detailed timelines, and BPA should provide detailed, advanced expectations for the July-October meetings. Implementing these practices will allow stakeholders to capitalize on input opportunities to the best of their abilities and increase the effectiveness of customer input.

/s/ John Carr

Executive Director

Alliance of Western Energy Consumers