



November 6, 2019

Via Electronic Submission

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

Re: October 23, 2019 TC-22, BP-22 and EIM Phase III Workshop

Dear Administrator Mainzer:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback on the October 23, 2019 TC-22, BP-22 and EIM Phase III Workshop. AWEC members have traditionally purchased a range of power and transmission services from the Bonneville Power Administration (“BPA” or “Agency”) and are also served by BPA’s utility Power and Transmission customers, often pursuant to contracts that pass BPA’s costs and policies directly through to AWEC members. Accordingly, AWEC members are extremely interested in BPA’s TC-22, BP-22 and EIM Phase III Workshop processes.

In general, AWEC is encouraged by BPA’s substantial consideration of TC-20 survey results and coordination of Agency initiatives (TC-22, BP-22, Grid Mod, EIM, etc.). It is clear that the Administrator and the Agency are dedicated to transparency with their customers throughout the TC-22, BP-22 and EIM process, and we look forward to cooperating with BPA throughout the scheduled Phase III Workshops.

Summary Timeline

In furtherance of continued transparency, AWEC recommends that BPA share a summary timeline of proposed topics across the TC-22, BP-22 and EIM Phase III Workshop monthly meetings. AWEC understands that the Phase III Workshops have recently begun, and thus, the timing will be subject to change depending on how workshop discussions move along in real time. AWEC further appreciates that BPA has invited customers to share in the shaping of this schedule from the outset. Nevertheless, AWEC believes that a more detailed working summary timeline will allow parties to offer BPA more meaningful feedback on the sequence of topics and ensure a uniform understanding between BPA and interested parties. A summary timeline will give interested parties the ability to plan their work accordingly throughout the year and thus, maximize everyone’s time during Phase III Workshops.

Non-Federal Resources

Given that BPA has identified non-federal resource participation as a priority issue, AWEC requests that any discussion of non-federal resources include consideration of the unique circumstances of cogeneration facilities.

Accelerated Amortization of Conservation Acquisition

In the final BP-20 Record of Decision (“ROD”), BPA decided not to accelerate the amortization of Conservation Acquisition regulatory asset at this time. In the ROD, BPA acknowledged the potential merit of this concept but noted the additional time it would take to assess its implementation. AWEC suggests initiating discussions about this concept earlier than the rest of the rate case topics, generally scheduled to occur in April or May.

Other Issues

AWEC also supports a number of comments that have been made by other customers at recent forums. For example, parties have noted that because of the multiple issues that are being addressed in a comprehensive manner, BPA should retain flexibility, and the ability to revisit decisions if later workshops produce new information or suggest that modifications to previous decisions would be more fair or better meet BPA’s goals.

Specifically, with regarding the EIM Phase III process, AWEC agrees with BPA and other participants that EIM Charge Code Allocation, EIM Losses, and EIM Resource Sufficiency are important issues that merit early discussion. Further, AWEC agrees that issues related to ancillary services will require further clarity and early discussion.

AWEC appreciates the opportunity to provide feedback on the October 23, 2019 Phase III Workshop and looks forward to future participation in the TC-22, BP-22 and EIM Phase III Workshop processes.

/s/ John Carr
Executive Director
Alliance of Western Energy Consumers