



**Eugene Water & Electric Board**

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Tech Forum ([techforum@bpa.gov](mailto:techforum@bpa.gov))

cc: Kevin Farleigh; Doug Johnson

**Re: Comments on TC-22, BP-22, and EIM Phase 3 Kickoff**

EWEB appreciates the opportunity to submit the following comments regarding the October 23, 2019 kick-off meeting for the TC-22, BP-22 and EIM Phase III customer workshops.

We would like to begin by signaling our support for the comments submitted by both the Public Power Council (PPC) and Western Public Agencies Group (WPAG) as being representative of our position.

In addition to the concerns identified by PPC and WPAG, we would also like to take this opportunity to highlight two additional areas where we would appreciate BPA's focused attention and enhanced engagement. Specifically, Issues 5 and 6 on BPA's Issue List are of particular importance to EWEB, and we would like take this opportunity to highlight our perspective.

We believe that Issue 5, EIM Transmission Usage for Network, is essential to BPA's successful EIM implementation. EWEB maintains both PTP and NT contacts with BPA, though we are primarily an NT customer, and we remain highly engaged in BPA's ongoing implementation of the NT product. We request that in determining the level of education that is required on this issue, the level of understanding for both BPA staff and its customers is considered. We look forward to working with BPA management and staff to achieve the goals of Phase 3 of EIM implementation alongside that of its network customers.

Further, as an LSE within the BPA Balancing Area Authority with a portfolio of resources that includes flexible hydro generation, we are especially interested in Issue 6, EIM Non-Federal Resource Participation. The requirements that BPA is working to establish for non-federal generation are certain to materially impact to our existing systems, processes, and operations, and so we will continue to seek enhanced levels of engagement from BPA as it moves forward. Further, it is our understanding that there is only a single entity within the Western EIM footprint with participating generation not owned by the Balancing Authority Market Participant. As a result, we would appreciate the opportunity to work collaboratively with BPA to address Issue 6, and would further like to request as much education and engagement as possible throughout.

Finally, EWEB would like to thank BPA for its approach to this process. The breadth of issues under consideration is considerable, and we are grateful for the thoughtful approach that BPA is taking.

Thank you once again for the opportunity to comment.