

August 12, 2020

Via Email: techforum@bpa.gov

Comments of Idaho Power Company Regarding Bonneville Power Administration's TC-22, BP-22, and EIM Phase III Workshop (held July 28-29, 2020)

Idaho Power Company ("Idaho Power") appreciates the opportunity to comment on Bonneville Power Administration's ("BPA") July 28-29, 2020 workshops.

I. BPA's Process for Interchange Rights Holder Donation of Transmission to the EIM

BPA staff explains that it has identified a third alternative for customer donation of transmission under the Interchange Rights Holder methodology.¹ Under the third alternative, customers would submit TSRs for donated transmission by T-77 and BPA would aggregate the TSRs into a single ETSR in each direction (import and export) for each Energy Imbalance Market ("EIM") path by T-75.

Idaho Power strongly supports the third alternative. As an EIM Entity, Idaho Power supports BPA aggregating all the transmission donations on a path into one import dynamic ETSR tag and one export tag. Doing otherwise—allowing multiple dynamic ETSR tags in each direction on a path—would be unnecessarily complicated and unmanageable.

II. Base Schedule Submission Deadline

BPA staff indicates that its proposal for financially binding base schedule submissions is to adopt a submission deadline of T-57, similar to other EIM Entities.² Idaho Power appreciates BPA's consideration of the pros and cons of the alternatives and strongly supports the proposal. Adopting the T-57 deadline will avoid seams issues with adjacent EIM Entities and will ensure consistent settlement data across EIM Entities.

III. Southern Intertie Studies

In its slides on the intertie studies topic,³ BPA describes a third "merged" option, suggested by Idaho Power and others, under which BPA would perform studies of requests for service on the Southern Intertie if BPA offers a study agreement or if the customer requests one. Idaho Power appreciates BPA's willingness to consider this alternative. Idaho Power supports either alternative two or the new "merged" alternative three.

Under BPA's proposed alternative one, it would offer a study if it determined it could provide one, and customers would have no opportunity to request a study. This is counter to the Federal Energy Regulatory Commission's ("FERC") open access principles and provides too much discretion for BPA to decide whether and when to offer studies for Southern Intertie TSRs, without any ability for the customer to request a study or influence BPA's decision. Further, it appears that if BPA offered a study, the customer then would be required to participate in and fund the study or such request would be deemed withdrawn. Alternative one, with BPA's absolute discretion to offer studies and the total lack of

¹ BPA's June 28 Presentation at 55-63, <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/07.28.20-Main-Tariff-Rates-EIM-Workshop.pdf>.

² *Id.* at 52.

³ *Id.* at 88-102.

customer ability to request a study, deviates entirely from the *pro forma* Open Access Transmission Tariff (“OATT”), is not consistent with open access principles, and creates risks of discriminatory or preferential treatment. As such, alternative one is not consistent with BPA’s stated principle of adhering to the *pro forma* OATT, industry standards, or industry best practice. It also has the potential to cause real harm to customers who may want a study and may be ready to move forward. For these reasons, Idaho Power does not support alternative one.

Alternative two or three are more reasonable approaches, because they would retain the customer’s ability to request and receive a study, consistent with FERC requirements, open access and nondiscrimination principles, and industry practice. These alternatives meet BPA’s desire to modify its tariff to remove the requirement to study all Southern Intertie TSRs and retain valuable flexibility for customers who want a study.

IV. EIM Charge Code Allocations

At the workshops, BPA staff shared its proposal for allocation of EIM charge codes.⁴ BPA staff proposes to allocate to customers three categories of EIM charge codes: base codes, neutrality codes, the unaccounted for energy code, and scheduling penalty codes.⁵ BPA proposes to *not* allocate to customers the following charge codes: bid cost recovery code, flexible ramp codes, grid management charge codes, the enforcement protocol penalty code, and administrative codes.

Idaho Power supports BPA’s proposal to allocate out the base codes, the neutrality codes, the unaccounted for energy code, and the scheduling penalty codes. Idaho Power supports BPA continuing to examine the other charge codes to see if they should be allocated out as well. Idaho Power looks forward to further discussion of these charge codes in future workshops.

V. Conclusion

Idaho Power thanks BPA for the opportunity to comment and for its consideration of this feedback.

⁴ BPA’s June 29 Presentation at 37-51, <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/07.29-30.20-Main-Tariff-Rates-EIM-Workshop.pdf>.

⁵ *Id.* at 46-48.