

August 14, 2020

Submitted electronically

RE: Comments in Response to July BP-22/TC-22/EIM Workshops

Northwest Requirements Utilities (NRU) submits these comments in response to certain issues discussed during the July 29-30 BP-22/TC-22/EIM workshops.

Process and Timeframe to Review Forthcoming Comprehensive Proposal

At the August workshops, BPA staff expects to share their comprehensive proposal on all EIM-related rates issues. This will be an important document for customers to review and provide feedback on, as it will represent the culmination of months of work preparing for the Initial Proposal. To ensure sufficient opportunities to discuss the comprehensive proposal and ask questions, we suggest BPA hold two customer-led workshops spread across two weeks by adding a workshop to the week of August 31st through September 4th, in addition to the workshop scheduled on September 9th. This would allow customers the time to digest information presented and develop additional questions or suggestions to bring forward. The materials are complex, and an additional workshop would provide all of us more time to deeply and effectively engage in discussions on staff's proposal.

Comments on the comprehensive proposal are due on September 18th. BPA has scheduled its next workshop only two business days later on September 22nd where BPA staff indicated they would respond to customer comments. We are concerned that two business days is an insufficient amount of time for BPA staff to read, properly consider and substantively respond to customer comments. It seems unlikely that staff would be able to vet potential changes with executives. Therefore, we ask BPA to delay the September 22nd workshop until they can consider modifications to their proposal based on customer comments and vet those modifications with executives.

Tier 2 Rate Carbon Adder

NRU supports having conversations regarding the carbon-free attributes of the federal system, interaction with BPA's "single system mix" statutory interpretation, the tiered rates construct, and differing carbon regulations. This is an extremely complex topic and deserves diligent and thoughtful considerations to avoid unintended consequences. We appreciate BPA beginning the dialogue now, with the understanding that this would not be brought into the BP-22 rate case.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Megan Stratman". The signature is written in black ink and is positioned below the word "Sincerely,".

Megan Stratman
Rates and Policy Director