

April 17, 2020

Via email:

techforum@bpa.gov

U.S. Department of Energy

Bonneville Power Administration

Re: PacifiCorp Comments Regarding Potential Process and Engagement Changes to TC-22, BP-22 and EIM Phase III Workshops

PacifiCorp submits the following comments in response to BPA's April 8, 2020, request for comment on a potential change to the schedule for TC-22, BP-22 and EIM Phase III workshops. PacifiCorp is sensitive to the challenges that BPA and all other regional parties are facing due to COVID-19 and appreciates BPA's decision to reach out to discuss alternative schedules and processes.

PacifiCorp would not oppose BPA's alternative proposal, but observes that the change might lead to fewer opportunities to engage in the collaborative, iterative process that often defines BPA's workshop proceedings. To date, parties have engaged with BPA under the assumption that there would be multiple opportunities to engage on a range of issues, including EIM implementation decisions and losses methodology. Accordingly, BPA may not have the benefit of parties' fully-formed opinions or analysis at this time. That said, parties have already provided considerable feedback on these issues and others, and BPA should take that feedback into account. Given the circumstances, it may be reasonable to abbreviate the workshop schedule, but in the absence of continued feedback, BPA should design its straw proposal with the understanding that it may need to make significant changes later this summer to garner regional support.

Additionally, PacifiCorp believes that BPA should prepare a list of issues it intends to address in its straw proposal and release it for comment prior to the scheduled April 28, 2020 workshop. The list of TC-22, BP-22, and EIM Implementation topics is extensive, and all parties, including BPA, would benefit from a transparent discussion of exactly what is likely to be included. Consensus on the list of topics to be included would prevent confusion and increase the utility of BPA's straw proposal.

Again, PacifiCorp appreciates BPA's dialogue and recognizes that current circumstances present significant challenges for BPA and all other stakeholders.