

Submitted via email to [techforum@bpa.gov](mailto:techforum@bpa.gov) on April 17, 2020

**RE: Comments in Response to BPA’s Proposed Changes to the TC-22, BP-22, and EIM Phase III Stakeholder Workshop Process**

PPC appreciates BPA staff taking the time to assess the remaining stakeholder workshop schedule and work to identify potential alternatives that would address concerns that have been raised by customers, including PPC, in previous workshops. This review is particularly well timed given the challenges that BPA and stakeholders are facing with social distancing guidelines set in response to the COVID-19 pandemic. PPC and its members are prepared to participate in the remaining workshops if they proceed as scheduled and appreciates the hard work of agency staff to host effective and informative virtual meetings such as the one held on March 17.

Throughout this process, PPC has appreciated BPA staff’s continued efforts to educate and engage stakeholders. So far, PPC has found working through the six-step process helpful, particularly starting with the education and background steps which have provided customers with a more consistent understanding of the problems BPA is trying to address. The time spent on these steps has helped customers better engage in discussions on these issues. We have also appreciated BPA’s use of customer-led workshops, which allowed BPA staff and stakeholders to continue to further explore these topics while reducing BPA’s workload associated with creating workshop materials. Any changes made to the schedule should continue to focus on providing a transparent and open dialog between BPA and customers and continuing the collaboration we have established in prior phases of the EIM process.

*BPA’s Proposed Process Changes*

PPC appreciates that BPA’s proposed schedule change responds to customer requests to review and understand a more holistic proposal for many of the interrelated issues being addressed in this process. PPC agrees there would be benefits from discussing of a more complete proposal with BPA. As all parties have noted during this process, many of these issues are interrelated and a decision on one topic will have impacts in other topics areas. Looking at the entire proposal altogether would allow customers to understand the full range of those impacts instead of looking at proposed changes piecemeal – as we have been doing at previous workshops.

However, PPC is concerned that the process changes proposed by BPA may result in a proposal that is too “baked” for customers to provide meaningful input. As discussed above the interrelated nature of these issues makes it such that a change in one issue could result in impacts to the other issues, adding to the complexity of revising the proposal. It is important that BPA and customers have sufficient time to: 1) discuss how BPA staff analyzed various alternatives in the proposal (both for issues individually and as part of the larger package), 2) identify how these decisions will impact BPA’s rates and tariff, and 3) work together to identify potential customer impacts of the proposals, which would have the potential to change BPA’s analysis.

Along these same lines, redlined language is likely not necessary to understand the general direction of BPA's proposal. Having BPA staff prepare redlined language before the general concepts are shared with customers is likely not the best use of staff's time. If BPA feels this is an important component of the proposal, PPC would like to better understand why.

Also, we are concerned that the number of workshops added in August through October will impact BPA's ability to make changes to the planned Initial Proposal based on customers' feedback during those workshops. It is important to ensure that customers and BPA are able to discuss staff's leanings far enough in advance that changes could still be made to the Initial Proposal based on those discussions.

#### *Alternative Approach*

PPC would like to see BPA take a modified approach that would create the benefits of discussing a more complete proposal, while ensuring there is enough time for BPA and customers to continue to work together to refine such a proposal in advance of beginning the formal rate and tariff processes. To ease some of the burden on BPA staff and facilitate development of a more comprehensive proposal, PPC supports cancelling the May workshop. We would be interested in working with BPA to explore whether a customer led workshop in May would be feasible to BPA after the April 28 workshop as part of this proposal.

Instead of cancelling the June workshop, BPA should use this opportunity to discuss the major components of the straw proposal with customers. This would not need to include redlined tariff or rate schedules. That language and other details should be developed after BPA receives feedback on the general direction of its proposal and has more discussion with customers. A summary or conceptual white paper would be a helpful way to communicate the proposal. This document could also present options on some topics rather than a single conceptual proposal if appropriate. While the workshop materials have been very helpful, PPC would recommend that no additional workshop materials be developed for this discussion to ease the burden on BPA staff. In order to facilitate a robust discussion between BPA and customers the draft document should be shared at least a week ahead of the scheduled June workshop.

Sharing the proposal earlier, even if it is not yet complete, would allow BPA and customers the best opportunity to work together on outstanding issues before the Initial Proposal. We would be interested in exploring other ways to keep communication open between BPA and stakeholders during this time in a way that would help facilitate progress while minimizing additional workload for BPA staff.

If this approach is not workable for BPA, PPC would prefer to work within the existing schedule and explore other options to address any challenges associated with that schedule.

#### *EIM Decision Document*

BPA's proposed changes to the TC/BP/EIM process schedule also includes delaying release of the EIM Phase III Decision Document until late October. PPC has concern in delaying that document without significant additional discussion in advance of its release. In our comments on the March 17 workshop, PPC asked several questions about the planned content of the EIM

Phase III Decision Document that have not yet been answered. It is PPC's understanding that the eight topics listed in BPA's Record of Decision on BPA's Energy Imbalance Market Policy under "Phase III Additional Policy Decisions" will be addressed in the document. It is also our assumption that these same topics will be included in BPA staff's comprehensive proposal on TC/BP/EIM issues.

We would like to work with BPA to better understand the plans to develop and discuss the EIM Phase III Decision Document. Is BPA planning on sharing a draft version for customer comment? Will all topics to be addressed in the decision document be outlined in staff's proposal? What will be the level of detail of the decisions included in this document? For instance, will these be "policy direction" type decisions, implementation detail decisions or both? How do the decisions made in the EIM Phase III document feed into staff's Initial Proposal?

It is difficult to comment on the appropriate timing of this document based on our current information. We would like to learn more about the planned content for the Phase III Decision Document so we can work with BPA to create a plan for development and discussion of that document.

#### *Conclusion*

PPC and its members want to support BPA staff to ensure that this TC/BP/EIM process is successful. We appreciate hearing from BPA staff about their concerns and about potential trade-offs with different approaches to the process. We hope that we can continue to work together and discuss potential changes to the proposed process in greater detail and continue to find collaborative solutions to procedural and substantive challenges. We thank BPA for the opportunity to comment.