



*Energizing Life in Our Communities*

Comments of Public Utility District No. 1 of Snohomish County  
In Response to Bonneville Power Administration's  
Proposed Changes to BP-22/TC-22/EIM Phase III Schedule

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

Public Utility District No. 1 of Snohomish County ("Snohomish") submits these comments in response to Bonneville staff's recent proposal to change the BP-22/TC-22/EIM Phase III pre-rate case workshop schedule as explained during the April 10 discussion between staff and customers ("April 10 Discussion").

Snohomish has supported Bonneville's six-step process approach to discuss and vet the issues in the pre-rate case workshops. In particular, we were supportive of the cadence of the workshops and appreciated Bonneville's willingness for additional Bonneville or customer-led meetings in the event they were needed. We understand that Bonneville is facing some challenges in part because of the public health crisis and has proposed changes to its schedule and process. We also recognize that many of the EIM policy issues that have been presented individually to date are interrelated and that there may be some benefit to Bonneville staff taking the time to put together a cohesive straw proposal that addresses these issues simultaneously. Snohomish would like to ensure that any process change leaves sufficient opportunity for customer engagement and offers the following comments that we trust Bonneville will receive as constructive:

**BP-22/TC-22/EIM Phase III Proposed Change in Schedule**

- April. Snohomish understands that the currently scheduled April 28-29 workshop will be changed to one day instead of two and will cover a more limited set of topics.
- May – June. **We support the alternative schedule proposed by PPC, which would cancel the two-day workshop in May and provide Bonneville staff the opportunity and time to instead draft its straw proposal.** We would request that BPA hold the planned June workshop and distribute the straw proposal to customers a week prior to the workshop date so the June discussion can be productive for all. As noted in PPC's comments, redlined language is likely unnecessary for customers to understand the June straw proposal.

Snohomish also notes that with this change in schedule, it is possible not all the issues can be fully addressed before time runs out. **It will be important to clarify in June which of the identified topics are expected to be addressed in the July-October period, and which ones could be deferred to the next cycle.**

- July – October. The pace of back-to-back, two day per week workshops proposed by Bonneville for this time period may pose challenges for customers to provide meaningful feedback and for Bonneville to incorporate that feedback under the six-step or similar process. We also note that Bonneville has suggested pushing back the release of the EIM Phase III Decision Document to late October, which may leave limited time for any customer feedback prior to the scheduled Initial Proposal in November.

We suggest that Bonneville and its customers engage in further discussion on the going-forward schedule with the goal of continuing a collaborative approach that would allow enough time for: (i) customers to digest the conceptual straw proposal; (ii) customers to provide feedback to Bonneville; (iii) Bonneville to issue one or more iterations of the straw proposal based on customer feedback; (iv) Bonneville to draft the EIM Phase III Decision Document; (v) customers to provide feedback to Bonneville on the draft Decision Document; (vi) Bonneville to finalize the Decision Document; and (vii) Bonneville staff to draft the initial proposal along with proposed tariff changes. **In order to support a proposed change in schedule, Snohomish would like to better understand the planned content of the Phase III Decision Document that Bonneville now proposes to release in late October and its relationship with the Initial Proposal. Further, we would propose that Bonneville release a draft of the Phase III Decision Document by the mid to late September timeframe to ensure sufficient time for customer feedback.**

## **TC-20 Settlement Workshops**

Snohomish supports Bonneville’s decision to continue with the TC-20 Settlement timeline as planned, including the scheduled workshop on June 23. However, it was not clear from the April 10 Discussion if Bonneville staff would have enough bandwidth in the proposed schedule to continue with the evaluation of the various TC-20 Settlement issues, e.g., hourly firm and available transfer capability. Snohomish requests that Bonneville clarify its intentions regarding the handling of the TC-20 Settlement issues going forward and allow customers to provide feedback on those intentions prior to making a final scheduling decision.

Snohomish understood Bonneville staff to state during the April 10 Discussion that, for instance, 100% of the hourly firm studies may not be completed by the time Bonneville would rollout the straw proposal in late July and that those studies may fall into “another area” that will not be ready. Beyond the required interactions between Bonneville and its customers pursuant to the TC-20 Settlement, Snohomish has appreciated the collaborative effort between Bonneville and its customers on the TC-20 Settlement issues and believes such collaboration should continue as originally expected.

**Other Pre-Rate Case Issues**

Snohomish has communicated to Bonneville that it would like the current 200 kW threshold for its Small Generator Interconnection Process be a topic for discussion at a future pre-rate case workshop for the TC-22 period. Given Bonneville’s proposed changes to the schedule, it is unclear how this topic or any new topic will be handled. We request Bonneville clarify how the proposed schedule will incorporate any new tariff or rate case issues.

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We appreciate the opportunity to comment and look forward to Bonneville’s response to customer comments.