

**COMMENTS OF THE WESTERN PUBLIC AGENCIES GROUP
REGARDING TC-22, BP-22 AND EIM PHASE III KICK-OFF**

Date Submitted: November 6, 2019

The utilities that comprise the Western Public Agencies Group (“WPAG”) appreciate the opportunity to submit these comments regarding the Bonneville Power Administration’s (“BPA”) October 23, 2019 kick-off meeting for the TC-22, BP-22 and EIM Phase III customer workshops.

The breadth of new issues to be covered in the TC-22, BP-22 and EIM Phase III workshops is considerable and we greatly appreciate the thoughtful and proactive approach BPA outlined in the October 23rd workshop for how it intends to work through those issues with its customers over the next year. BPA’s scheduling of meetings well in advance allows customers to plan ahead and more effectively participate in the workshops. In addition, we believe that BPA’s proposed six step approach for addressing issues is a promising framework that will provide multiple touch points over the course of several workshops for customers to learn, consider, and provide multiple comments to BPA on each particular issue. This is preferable to a framework that would introduce new issues and BPA’s proposed solution to such issues in a single workshop.

One suggestion we do have with respect to BPA’s proposed six step process is for BPA to identify early on in Step 1 or Step 2 how a given issue is related to issues discussed in earlier workshops or to be discussed in subsequent workshops. For example, if there is a connection between EIM Resource Sufficiency (Issue 3 on BPA’s Issue List) and Ancillary Services (Issue 10) and/or EIM Non-Federal Resource Participation (Issue 6), we respectfully ask that BPA make that connection clear when presenting Steps 1 and 2 on EIM Resource Sufficiency on November 19th. In addition, and again for example, when BPA later presents Steps 4-6 on EIM Resource Sufficiency, we request that it identify the implications (if any) each alternative solution may have on how BPA will subsequently address the Ancillary Services and EIM Non-Federal Resource Participation issues to be discussed later. Such issue road-mapping will help BPA’s customers understand how each issue fits within the bigger picture and, hopefully, will reduce the need to revisit BPA’s proposed solutions to issues addressed in prior workshops because the implications of such solutions to other issues will already have been flagged or identified.

Finally, we understand that Greenhouse Gas Accounting under the EIM will not be included in EIM Phase III. Nonetheless, it is important for BPA to work with and coordinate with its customers to address outstanding questions regarding GHG accounting in the EIM. If BPA chooses not to have that discussion as part of the EIM Phase III process, then it should initiate that discussion contemporaneously in a separate forum.

Thank you for the opportunity to comment.