

April 17, 2020

Via Email

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

**Re: Comments of Avangrid Renewables, LLC on TC-22, BP-22, EIM Phase III
Workshop Schedule**

Avangrid Renewables, LLC (“Avangrid”) hereby submits comments to the Bonneville Power Administration (“Bonneville”) concerning the WebEx meeting held on April 10, 2019 discussing potential process and engagement changes to Bonneville’s workshop schedule (the “April 10 Call”). Avangrid agrees that providing a holistic straw man proposal would be beneficial, but has concerns about the timing of meetings in the alternative schedule proposed and therefore asks Bonneville to make incremental steps towards a hybrid of the original and alternative schedules. Regardless of which process Bonneville chooses to follow, however, Avangrid urges Bonneville to provide as much transparency as possible about the formation of its straw proposal so we can all resume the stakeholder process efficiently. To that end, Avangrid asks Bonneville to provide a detailed list of all the topics, and subtopics, that will be included in the straw proposal before pausing the meeting schedule.

Providing a Holistic Proposal with Bonneville’s Initial Leanings Is a Good Idea

On the April 10 Call, Bonneville explained its belief that providing a straw proposal with the agency’s initial leanings would help the stakeholder process proceed more efficiently and allow stakeholders to provide more constructive feedback. Avangrid agrees. Knowing Bonneville’s initial leanings will allow stakeholders to comment more effectively.

The Alternative Procedural Schedule May Not Provide a Better Overall Result

In order to provide a holistic straw proposal, however, Bonneville has proposed an alternative workshop schedule. The new schedule has three main differences from the current schedule. First, the eight remaining workshops from May 19 to August 26 would be canceled. Second, the EIM Phase III decision document would be pushed back from August to October. Third, 28 new potential workshops have been scheduled from July 14 to October 28.

Bonneville’s proposal is hugely significant and may limit or otherwise constrain stakeholder participation in the formation of the EIM Phase III decision document and/or the Initial Proposal. Avangrid believes the workshops have been fruitful in vetting the alternatives and providing a baseline educational component so that Bonneville and stakeholders are on the same page moving into the TC-22, BP-22 proceedings. Because the EIM adds an additional level

of complexity to Bonneville’s “normal” process, Avangrid is concerned about the volume of material that remains to be covered¹ and questions whether the pace proposed in the alternative schedule is realistic. Avangrid wonders if the alternative schedule provides enough time to fully move a proposal through a robust stakeholder process with enough Q&A and analysis time. The more aggressive meeting schedule could result in issues that are not fully vetted. As neither the Initial Proposal nor the other EIM dates have been adjusted, the alternative schedule does not allow for any additional time if Bonneville has underestimated the amount of time needed. While Avangrid appreciates that the coronavirus pandemic is currently impacting our ability to meet and work together, it may continue to do so throughout the summer and/or fall. Simply put, with a significant number of topics that remain to be addressed, it is not clear that we can afford to take such a long break now. Avangrid therefore asks that Bonneville consider reconvening meetings in late June or early July, perhaps providing a partial straw proposal, rather than in mid-July with less time remaining to work with and which results in an aggressive and compressed schedule.

Bonneville Should Provide as Much Transparency as Possible

Regardless of which procedural path Bonneville chooses for the remainder of the TC-22, BP-22, EIM Phase III process, Bonneville should ensure that it is able to provide full transparency to stakeholders regarding its initial leanings. Ensuring stakeholders have as much information as possible will allow the workshops to move forward effectively. Avangrid therefore asks that Bonneville provide a detailed list of all issues—including any outstanding questions identified thus far—before pausing the workshop schedule. Up to this point, parking lot issues and questions were raised in the workshops that have already been held continue to be outstanding, with the understanding that they would be addressed in a future meeting. Therefore, providing a comprehensive list of all issues and their status, dependencies and interconnections would help stakeholders to fully understand the scope of work which remains before suspending the workshops. This transparent itemization of outstanding issues will ensure all stakeholders have a clear understanding of the outputs that should be anticipated following the break and will establish mutual accountability between the parties as we proceed through the remaining workshops.

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Avangrid appreciates the opportunity to submit these comments and looks forward to working with Bonneville during the remainder of the workshop schedule. By return e-mail, please confirm Bonneville’s receipt of these comments.

¹ See TC-22, BP-22 and EIM Phase II Customer Workshop Presentation at 11 (March 17, 2020) (indicating that we are roughly halfway through the topics Bonneville intends to cover), *available at* <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Pages/Meetings-and-Workshops.aspx>.