



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

#	Ref	Issue	Decision	Policy Question to Resolve	Staff Leaning / Step 6 Recommendation	Rationale for Staff Leaning
1	EIM	Charge Code Allocation (CC-1)	BP-22	What approach should Bonneville adopt in recovering its costs (or distributing credits) for charge codes that it will receive as an EIM Entity from the CAISO?	<p>Phased in charge code allocation approach.</p> <ul style="list-style-type: none"> For BP-22, begin Charge Code Allocation and Modify Existing Rate Structures BP-24, Leverage Preliminary Data to Modify Charge Code Allocation and/or Rate Structures BP-26, Utilize Two Years of Data to Complete Refinement of Charge Code Allocation and/or Rate Structures 	<ul style="list-style-type: none"> It begins the alignment of cost causation and cost allocation. Aligns with cost causation, but only if Base + Neutrality codes were sub-allocated. Prioritizes sub-allocation of charges where customers are able to exert some control over the charges.
2	EIM	EIM Losses (EL-2)	EIM Phase III Decision	How should BPA handle EIM losses? Should it settle financially instead of a physical repayment? Do we use the status quo (1.9% Network, 3% Intertie) for the EIM?	<ul style="list-style-type: none"> BPA is proposing to have the CAISO effectively allow EIM Entities to have a 0% loss factor and to have a real-time loss calculation of 0 MW. The result is that the UFE (Unaccounted For Energy) charge code essentially goes away and it no longer is an issue. In fact, the CAISO recently started a stakeholder initiative and proposed BPA's solution as an enhancement to their real-time settlement process. As a note, EIM losses are separate and distinct from transmission losses. Issues related to transmission losses will be decided in the BP-22 and TC-22 proceedings. 	<ul style="list-style-type: none"> The EIM does not provide system or BAA losses, but takes them into consideration when ensuring each BAA is balanced prior to the hour The EIM also takes into consideration marginal (a.k.a. incremental) losses that result from market awards and dispatches Losses are embedded in load Uninstructed Imbalance Energy (UIE), Unaccounted For Energy (UFE), and Real Time Imbalance Energy Offset (RTIEO) charge codes This settlement approach ensures that the cost of losses is recovered from all customers, not just customers with load in the BAA. If the Settlement Team determines that Measured Demand will not include exports associated with wheels, BPA will reevaluate the recommendation on losses on EIM transfers.
3	EIM	Resource Sufficiency (RS-3)	TC-22	What Options Are Available for Assessing Sub-BA sufficiency in the EIM?	<p>For initial EIM entry, BPA will pursue Alternative 1: Status Quo; Everyone schedules to their best available anticipated load, subject to EIM timelines.</p> <ul style="list-style-type: none"> BPA will not sub-allocate CAISO's load forecast or assign scheduling obligations As part of RS, BPA will not ask customers to submit a separate load forecast. 	<ul style="list-style-type: none"> Customers were generally supportive of submitting load forecasts to BPA to help BPA better manage the requirements of the Balancing Test Customers were not supportive of sub-allocating CAISO's BAA load forecast to the individual LSE level, and requiring that they schedule to this load forecast



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					<ul style="list-style-type: none"> However, the definition of Forecast Data and Sections 4.2.4 and 4.2.4.3 in Attachment Q have been added to the EIM tariff language documents and this data is expected to be used for RS analysis purposes. 	<ul style="list-style-type: none"> In weighing various sub-BA options for the EIM, BPA has concluded that it does not have all the data necessary to properly analyze each option. Therefore, BPA will pursue a status quo Sub-BA model for EIM entry and conduct an assessment post EIM entry to determine what more advanced structure should be pursued.
4	EIM	Resource Sufficiency (RS-3)	TC-22	Should BPA Set a Pass Target for RS? (from June 23 workshop)	<ul style="list-style-type: none"> BPA will not set an RS pass target 	<ul style="list-style-type: none"> Customers were generally supportive of not setting an RS pass target Setting a specific pass target: <ul style="list-style-type: none"> Could significantly increase the complexity of EIM implementation Does not align with EIM industry standards Does not seem to be necessary for BPA to having a high pass rate
5	EIM	Resource Sufficiency (RS-3)	TC-22	In the EIM what options are available for BPA to set base schedules, and when should BPA require the submission of base schedules?	<p>BPA will set all financially binding base schedules at T-57.</p> <p>Since BPA's current time line is not compatible with the EIM base schedule timeline, for purposes of this decision, the status quo will be based upon the EIM base schedule timeline in the transmission tariffs of the existing EIM Entities</p>	<ul style="list-style-type: none"> There does not seem to be a compelling reason to do something different than the status quo. Moving the financially binding point to T-50 does not alleviate the impact to customers of having an EIM financially binding point earlier than T-20 (the extra 7 minutes does not buy the customer much). BPA staff is also factoring in the advice from Utilicast. BPA does not fully understand the complexities of the EESC activity between T-57 and T-40, and staff is concerned that BPA will struggle as well, even with the full time period between T-57 and T-40. Many parties that are trading in the market are already held to the T-57 due to their EIM trading partners. Concern neighboring BAs have about impacts and Seams issues if BPA were to use T-50



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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6	EIM	Network Usage (NU-5)	TC-22	Which transmission products should be eligible for Interchange Rights Holder donation of transmission for EIM transfers?	BPA will allow both firm and non-firm PTP of any term to be donated for EIM transfers. Given the nature of NT service for service to load, the transmission products allowed to be donated for EIM do not include NT products	<ul style="list-style-type: none"> ▪ Allowing non-firm transmission donations to EIM will create a significant benefit to the region because it will enable more flexibility for donations of transmission to the EIM. ▪ There is little risk that customers will not roll over some LTF purchases because they can donate non-firm transmission to EIM. This conclusion is based on the fact that: <ul style="list-style-type: none"> ○ There are relatively small cost savings from switching to HNF for some customers. ○ It would be extremely difficult to determine how much HNF to buy on which hours for donation to EIM. Customers who attempted to do so may miss opportunities to benefit financially from EIM dispatches. ○ LTF PTP service allows customers to optimize its use over multiple markets, provides redirect opportunities and provides long-term benefits due to encumbrance over constrained paths.
7	EIM	Participating Resources (PR-6)	TC-22	TX Reservation Requirement: What type of contract should be required for Participating Resources to ensure they are subject to the terms of the tariff and BPs?	BPA staff recommendation is to use existing service agreements.	<ul style="list-style-type: none"> ▪ Minimal Administrative Burden for BPA and Customers ▪ Consistent with what other EIM entities are doing (BPA attachment A consistent with the non-firm template of others) ▪ BPA's attachment A/PTP is applicable to both firm and non-firm ▪ BPA is proposing a change to address the service commencement language in Attachment A. ▪ Participating Resources in the BPA BAA would be subject to the terms of the BPA tariff ▪ BPA retains its ability to effectively exit the market - Little impact to EIMPRs



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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8	EIM	Participating Resources (PR-6)	TC-22	TX Reservation Requirement: What type of transmission reservation, if any, should be required for Participating Resources?	BPA staff recommendation is to not require transmission reservations for EIMPRs	<ul style="list-style-type: none"> ▪ May result in less Transmission revenue ▪ Aligns with industry best practices ▪ BPA is compensated for Transmission used in EIM (EIM uses donated transmission and transmission already purchased to serve load in the BAA) <ul style="list-style-type: none"> ○ Transmission donated to the EIM is paid for by the Transmission customer ▪ Impact EIMPRs who have not acquired transmission if BPA exits the market
9	EIM	EIM Transmission Usage on Network (Issue #5)	TC-22	Policy Issues Related to Transmission Donation: Which transmission products should be eligible for customer donations of transmission for EIM transfers?	Team Recommendation is to allow all firm and non-firm PTP products to be donated for EIM.	Given the risk to market efficiency under Alternative 1 and the similar risk between Alternatives under the other decision criteria, staff recommends Alternative 2, allow both firm and non-firm PTP transmission to be donated for EIM transfers.
10	EIM	Participating Resources (PR-6)	TC-22	Policy Issues Related to Transmission Donation: What should the transmission donation process be? (NOTE: This includes the issue of when e-Tags for donated transmission are due)	Transmission donation will be done through submission of a TSR by T-77	<p>The main drivers for the recommendation are:</p> <ul style="list-style-type: none"> ▪ Allows time for donated transmission to be included in the RS tests <ul style="list-style-type: none"> ○ Allows diversity benefits to be factored in while setting Base Schedules ▪ Interaction with neighboring BAs It shows BPA is being responsive to comments we've received from our neighboring BAs <ul style="list-style-type: none"> ○ BPA has time to author a dynamic e-Tag using donated TSRs
11	EIM	Participating Resources (PR-6)	TC-22	What non-federal resources qualify: Will BPA allow, and what would be external resource participation requirements (dynamic/pseudo-tie)?	Resources physically in the BA or pseudo-tied into the BA.	<ul style="list-style-type: none"> ▪ Dynamic schedule no way to account for UFE/UIE. ▪ Creates inequality between resources. ▪ Delta stays with source BA (net schedule interchange as part of the ACE).
12	EIM	Participating Resources (PR-6)	TC-22	What non-federal resources qualify: will BPA allow loads that are able to provide Demand Response to participate?	BPA will use a phased-in approach that is consistent with CAISO phased approach to allow non-federal generation to join and will look at TC24 to allow Demand response to participate.	There is a lot of work in preparation of BPA joining the EIM. 6 months following BPA's joining, BPA will allow non-federal generation elect to join. Following that, by TC-24 BPA will look at allowing Demand Response to participate.



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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13	EIM	Participating Resources (PR-6)	TC-22	Will EESC collect all the data for the load base schedule or require direct input from customers?	BPA as the EESC will submit the data into Base Schedule Aggregation Portal (BSAP)	<p>Minimizes impact to customers.</p> <ul style="list-style-type: none"> ▪ No extra technology requirements for customers. <ul style="list-style-type: none"> ○ Likely still requires coordination to ensure forecasts are submitted in the correct time frames (T-7d vs. Preschedule) ○ Minimal extra scope above submitting the same data for federal PR/NPR ▪ Consistent information between what the market is using vs. what BPA is using for operations. ▪ Allows pre assessment of power balance and RS checks
14	EIM	Metering (M-7)	EIM Phase III Decision	Metering Requirements: Bonneville metering specifications should be equivalent to the CAISO's requirements in order to enable accurate settlements.	Bonneville metering specifications should be equivalent to the CAISO's requirements in order to enable accurate settlements. After further examination of Bonneville's metering specifications and the CAISO's requirements, Bonneville does not believe any further action is necessary for either generators or load in the balancing authority area.	Generators and load in Bonneville's balancing authority area should already meet Bonneville's current metering technical standards, as documented in STD-000001 "Technical Requirements for Interconnection" and STD-DC-000005 "Meter Application Guide." These requirements are sufficient for EIM use. Therefore, as long as generators and load have met Bonneville's metering technical standards, no further action is required.
15	EIM	Metering (M-7)	EIM Phase III Decision	What is BPA's policy for aggregation of ETSRs?	BPA will collect all approved donated TSRs on all EIM transfer paths at T-77. This would require Interchange Rights Holders to submit TSRs for their donations in time for them to be approved by T-77. BPA will aggregate and submit a dynamic e-Tag(s) and submit the transfer limit to the MO.	<ul style="list-style-type: none"> ▪ Consistent with what the other EIM entities require for Interchange Rights Holder Donation. ▪ Would not create a seams issue between BPA and the other EIM Entities ▪ Power Services stated that by T-75 most of the marketing is done, so the status quo should not negatively impact Interchange Rights Holders' use of their transmission in other markets. ▪ The donation deadline may be consistent with the schedule for the Resource Sufficiency test; the first round of which is run at T-75. As such, the donated transmission could be included in the Resource



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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						<p>Sufficiency test allowing for the inclusion of any potential diversity benefit.</p> <ul style="list-style-type: none"> ▪ A donation right at T-75 may be too late to be included in the RS test ▪ Reduces the variables that are changing as the BA makes changes needed for the BAA.
16	EIM	Metering (M-7)	EIM Phase III Decision	Will BPA, as the EESC, collect all data for the load base schedule or require direct input from customers?	Bonneville does not propose any new metering requirements to participate in the EIM.	<ul style="list-style-type: none"> ▪ No extra technology requirements for customers. Likely still requires coordination to ensure forecasts are submitted in the correct time frames (T-7d vs. Preschedule) Minimal extra scope above submitting the same data for federal PR/NPR ▪ Consistent information between what the market is using vs. what BPA is using for operations. ▪ Allows pre assessment of power balance and RS checks
17	EIM	Participating Resources (PR-6)	TC-22	Will BPA offer to be a PRSC for others in the BA?	<p>Do not register to provide Participating Resource Scheduling Coordinator (PRSC) services for non-federal participating resources.</p> <p>After BPA has a few years of EIM experience, BPA may want to review the issue and possible offer the service at that time.</p>	<ul style="list-style-type: none"> ▪ Minimizes project complexities of joining the EIM <ul style="list-style-type: none"> ○ A number of systems would need modifications (SCADA, AGC, Settlement, etc.) ▪ Providing the service is not a core business capability at BPA ▪ There are companies that are better positioned to provide this service <ul style="list-style-type: none"> ○ Companies already exist to provide this service including Shell and TEA <p>No known demand for this service</p>
18	EIM	Operational Controls (OC-8)	N/A	What changes should be considered for OCBR based off resource sufficiency decisions? Or conversely should OCBR impacts be a deciding factor for RS decisions?	RS decisions will not have an impact on OCBR design. Maintaining 99.7% coverage for the BA, including OCBR events, were considered in RS decisions, as well as the Gen Inputs process. Some changes are needed to the OCBR tool to comply with the EIM structure and timing. OCBR may be able to take advantage of the EIM structure to less the impact of OCBR events as well. Design is on-going for OCBR. Changes will be	Will be determined in a business practice process.



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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					discussed through with customers as part of the Balancing Reserves BP update process.	
19	EIM	Operational Controls (OC-8)	TC-22	What changes should considered for OCBR based off resource sufficiency decisions? Or conversely should OCBR impacts be a deciding factor for RS decisions?	RS decisions will not have an impact on OCBR design. Maintaining 99.7% coverage for the BA, including OCBR events, were considered in RS decisions, as well as the Gen Inputs process. Some changes are needed to the OCBR tool to comply with the EIM structure and timing. OCBR may be able to take advantage of the EIM structure to less the impact of OCBR events as well. Design is on-going for OCBR. Changes will be discussed through with customers as part of the Balancing Reserves BP update process.	Will be determined in Balancing Reserves business practice process.
20	EIM	Operational Controls (OC-8)	TC-22	What, if any, changes should BPA make to the OMP? Should BPA take on more risk assuming the EIM may solve some of the problem OMP addresses?	Oversupply Management Protocol (OMP) can proceed with no Tariff modifications. Minor changes are needed to address EIM timing requirements. Design is on-going for OMP. BPA is unable to guarantee the EIM will asset or solve issues that drive the need for OMP. Changes will be discussed through with customers as part of the OMP BP update process.	Will be determined in the OMP business practice process update.
21	TC	Transmission Losses (TL-9)	TC-22	Line Loss Settlement. Current Network Loss Factor is 1.9%. How granular should the Loss Factor be?	Losses team is recommending a monthly granularity. This is accurate enough to follow load and gen patterns on the system.	Staff is recommending monthly for reasons of accuracy. Monthly reflects the changing utilization of the system for consumers such as irrigators and will capture seasonal changes.
22	TC	Transmission Losses (TL-9)	TC-22	Should BPA update its network loss factor?	Staff proposes an update to the network loss factor to be consistent with the loss study recently performed by the engineers	It has been nearly 20 years since BPA last updated its system loss factor. We received general support that BPA should update its loss factor to reflect the changes on the system.
23	TC	Transmission Losses (TL-9)	TC-22 BP-22	Should BPA allow customers to choose to supply in-kind losses in BP-22?	<ul style="list-style-type: none"> BPA will propose to maintain the in-kind loss return option for the BP-22 rate period. BPA is proposing to reduce the frequency of elections to either annually or once per rate period 	Customer have expressed unanimous concern about removing the option to provide in-kind loss returns. Leaving this option, gives customer time to change their business model. Most of the utilities are settling financial only, this option allows customers time to phase to what most utilities use for settlements.



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					<ul style="list-style-type: none"> BPA is signaling that it plans to discontinue 168 hour return of in-kind losses following BP/TC-22. BPA will examine Concurrent In-Kind Losses and Financial Only settlement during the BP/TC-24 proceedings. 	
24	TC/B P	Transmission Losses (TL-9)	TC-22 BP-22	How should BPA calculate the cost of providing loss services and how will that cost be allocated to customers that use those services?	<p>BPA will charge an energy and capacity cost for transmission losses.</p> <p>BPA will offer two options for settlement for BP22 and will review the two options in BP24:</p> <ul style="list-style-type: none"> BPA will offer in kind settlement with a 168 hours delay. This settlement option will have a capacity charge that will be recovered in the Transmission rates. Transmission will recover the capacity charges using a formula rate If a customer choses financial settlement, then the customer will be charge energy and capacity and will be recovered in the Power rates. <p>In addition, BPA is considering the implementation of FFI (Financial For Inaccuracy) where:</p> <ul style="list-style-type: none"> Charge associated with each instance of inaccurate schedule. Would be billed using the following formula <ul style="list-style-type: none"> “cost for financial losses at the time of the default” multiplied by “TBD factor” Customers would not return in-kind losses for defaulted hours <p>Customers would continue to return in-kind losses for all other hours through the rate period except for defaulted hours.</p>	<ul style="list-style-type: none"> Prices value for services provided by Power Allows for a 7(i) for the pricing of service requested by customer Encourage the customer behavior to return delayed losses
25	TC	Ancillary Services- Gen Inputs	TC-22 BP-22	How will we properly incent scheduling behavior if BPA joins the EIM? Will we	<ul style="list-style-type: none"> Remove Existing EI/GI Deviation Bands Modify the ID and PD penalties 	<ul style="list-style-type: none"> Regarding EI/GI Deviation Band recommendation: <ul style="list-style-type: none"> Relies on sub-allocation of EIM codes to manage EI/GI



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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		(ACS-10)		<p>keep, remove, or modify our existing incentive mechanisms?</p> <ul style="list-style-type: none"> • Energy Imbalance (EI) Bands, • Generation Imbalance (GI) Bands, • Intentional Deviation Penalty (ID), and • Persistent Deviation Penalty (PD) 	<ul style="list-style-type: none"> ○ Apply modifications in BP-22 to adapt to EIM model, may need to revisit if further adjustments are needed in BP-24 ○ For PD, propose to move first tier from 3 hours to 4 hours to account for scheduling being due at T-57 instead of T-20 <ul style="list-style-type: none"> – Propose to move to 100 mills per kWh instead of the greater of 125% of BPA’s highest incremental cost during that day or 100 mills per kWh – Considering adjustments for participating resources – A DERs participating resource with continual Uninstructed Imbalance Energy (UIE) would still be impacting the FCRPS, whereas Instructed Imbalance Energy (IIE) would be handled in the market and should not be penalized. – Continuing to consider the system implementation ability to support the adjustments. ○ For ID, Intentional Deviation Measurement Value will be equal to the forecast value BPA supplies to the customer prior to T-57 <ul style="list-style-type: none"> – Not anticipating adjustments for participating resources, but still under review – ID is based on the forecast comparison to what is scheduled – Unclear if there would be an impact for the EIM dispatch 	<ul style="list-style-type: none"> ○ Aligns with other EIM Entities ○ Removes price index risk, as it moves away from Mid-C Index ▪ Regarding ID and PD penalty recommendation: <ul style="list-style-type: none"> ○ ID/PD penalties directly incentivize loads and generators to schedule accurately and not accumulate imbalance energy <ul style="list-style-type: none"> – The EIM’s O/U scheduling penalty is at the BAA-level, and does not apply if the BAA balances to the CAISO’s Area Load Forecast (ALF). Therefore, O/U scheduling penalty does not address the same concerns as the ID/PD structure. ○ If EIM were sufficient to incentivize accurate scheduling, then would not anticipate that the PD and ID penalties would trigger. If the EIM is not sufficient, the mitigation tools are still in place.



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26	TC	Generation Interconnection (GX-12)	TC-22	How can we ensure we're in compliance with Order 845? Is there a more efficient process for large generation interconnection repower / replacement request?	Tariff language to implement Order 845 and LGIP Repower/Replacement process language	Pro forma implements the Order 845 and includes what customers have asked us for repower and replacement.
27	TC	Regional Planning (RP-13)	TC-22	How can BPA could incorporate regional planning into its Attachment-K?	Incorporate into Part IV of BPA's Attachment K a reference to the NorthernGrid website where the Member planning process will be posted (as it may be amended), to meet its regional planning tariff obligations	<ul style="list-style-type: none"> Ensures that BPA's tariff references the most current version of the Member planning process, agreed to by all NorthernGrid members, which will reduce the potential for confusion by Customers / Stakeholders should the Member planning process be revised before being incorporated into BPA's tariff pursuant to a terms and conditions proceeding Reduces administrative burden on both BPA and its Customers, since BPA will not be required to seek changes to the Member planning process through a Terms and Conditions proceeding
28	TC	Creditworthiness (CW-14)	TC-22	Should Bonneville move its Basic Credit Standards from OASIS and the BPA website into an attachment to BPA's tariff?	The staff proposal is to add the Basic Credit Standards in BPA's tariff in Attachment M.	<ul style="list-style-type: none"> The proposal aligns with BPA's objective to align BPA's tariff closely with the pro forma tariff. Additionally, the placement of the Basic Credit Standards is common industry practice. BPA received minimal customer feedback, but that feedback indicated customers supported including the Basic Credit Standards in the tariff. BPA shared its draft Attachment M with customers as part of the April TC-22 workshop.
29	TC	Agreement Templates (AT-15)	TC-22	Should BPA revise the Open Access Transmission Tariff (OATT) to reflect electronic communication and signature and other incremental revisions?	<p>The staff leaning is to propose to revise the PTP and NT Service Agreement Templates in Attachments A and F</p> <ul style="list-style-type: none"> Revise templates to allow for electronic communication and signature. Correct minor format/numbering sequences for 	<ul style="list-style-type: none"> Modifying the Service Commencement Language to Address Risks Identified in Participating Resource Transmission Agreements Issue These Revisions are to new Umbrella Agreements, Attachment A and F only. This alignment will not change the Transmission Customers existing agreement, with the exception of Exhibit D, Notices, which BPA has or will offer



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					consistency. Clarify the effective date of service agreements for entities that become customers solely to participate in the EIM (incorporating customer suggestions)	<ul style="list-style-type: none"> revisions to customers to accommodate electronic communication; ▪ Aligns the OATT Attachment A and F and current contract templates; ▪ Allows electronic communication (emailing of contracts); ▪ Allows electronic signatures on contracts; ▪ Improves efficiency with a streamlined Processes; ▪ Saves BPA and Transmission Customers money. ▪ Provides Continuity of Operations ▪ Allows necessary changes in order for BPA to join the Western EIM.
30	TC	Seller's Choice (SC-16)	TC-22	The TC-20 Settlement agreement established a sunset date for BPA's Seller's Choice implementation (a temporary exception to the tariff) on 9/30/2021. What is recommended for the next rate period, a new proposal or status quo?	Allow BPA's Seller's Choice implementation to sunset on 9/30/2021.	<ul style="list-style-type: none"> ▪ Enables Planning to meet its obligation to ensure designated network resources can serve network load ▪ Aligns most closely with pro forma tariff for NT service ▪ Aligns most closely with BPA's strategic goals ▪ Aligns most closely with industry standard ▪ Maintains market access using 6NN for non-federal resources ▪ Resolves double loss issue ▪ Eliminates concern about potential future ATC impacts ▪ Implementation <ul style="list-style-type: none"> ○ Lowest risk implementation option ○ No transmission commercial system application development needed ▪ Removes a one-off from the system, making the system more stable
31	TC	Intertie Studies (IS-34)	TC-22	Should we change our Tariff to match our process or follow our Pro Forma?	Change the Tariff such that a TSR impacting the Southern Intertie initiates study only upon customer request or BPA discretion:	Based on customer feedback, BPA staff believe the merged alternative (study triggered at either BPA's discretion or customer request) is the best option to respond to customer concerns that alternative one



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					<ul style="list-style-type: none"> ▪ Modify the tariff to only conduct studies in response to Southern Intertie TSRs when a customer executes a study agreement offered by BPA either at the customer's request or BPA's discretion, otherwise the TSR will remain in STUDY status if/until ATC is available or the TSR expires. ▪ Offers of capacity would be made in queue order as capacity becomes available. ▪ May be the SIS requestor's responsibility to engage the other impacted parties (e.g., Californian Transmission Providers, etc.). ▪ A business practice would need development to establish the process, responsibilities, and clarify how the SIS would affect all TSRs in the queue. <ul style="list-style-type: none"> ○ To ensure queue order is honored, if a single customer requests a study, each higher-queued TSR would also be offered a study, at their expense. ○ This study may be either a cluster study or a series of individual studies. 	(study triggered at BPA's discretion) deviates from the <i>pro forma</i> OATT, is not consistent with open access principles, and creates risks of discriminatory or preferential treatment.
32	BP	Gen Inputs (GI-19)	TC-22 BP-22	<ul style="list-style-type: none"> ▪ VERBS Scheduling Elections in EIM ▪ Balancing Reserve Capacity Forecast <ul style="list-style-type: none"> ○ Change Comparison ○ Component Comparison ▪ Pricing <ul style="list-style-type: none"> ○ Embedded Cost ○ Variable Cost ○ Capacity Pricing ▪ ACS Rates ▪ Impact of Each Modeling Change 	<ul style="list-style-type: none"> ▪ Require VER Schedules to use the BPA-supplied Hourly Meteorological Forecast ▪ Regulation/Non-Regulation Pricing Method B 	<p>Benefits for Customers</p> <ul style="list-style-type: none"> ▪ Concern about cost to VERs if BPA joins the EIM <ul style="list-style-type: none"> ○ Lower Balancing Reserve Capacity need – lower VERBS rate ○ Lower cost of forecast data <ul style="list-style-type: none"> – Avoids the direct assignment of the costs associated with the MO or other vendor supplied meteorological data – Avoids the direct assignment of BPA's cost to implement <p>Benefits for BPA</p> <ul style="list-style-type: none"> ▪ Ease of implementation – one set of VERBS rates ▪ Less system modifications needed



TC-22, BP-22 and EIM Policy Issue and Resolution Summary

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33	EIM/TC	Development of EIM Tariff Changes		What language will need to be added, removed or updated to enable BPA's participation in the Western EIM?	EIM tariff documents for tariff proposals related to EIM policy decisions have been shared at several customer workshops. A complete proposed Attachment Q has been included in the draft TC-22 tariff shared at the August workshop. PGE EIM Tariff was the basis for the EIM tariff and any changes from the PGE EIM Tariff were reflected in the EIM issues and in workshops	<ul style="list-style-type: none"> ▪ Lower Balancing Reserve Capacity need – less impact on FCRPS ▪ The changes and the rationale for the changes shared in the specific EIM policy issues and these EIM tariff reflects the changes. ▪ All minor edits, clean up or deviations from PGE EIM have been discussed and shared at the workshops