



*Your Community Energy Partner*

April 12, 2019

Submitted via email to: [techforum@bpa.gov](mailto:techforum@bpa.gov)

**Subject: Comments of Public Utility District No. 1 of Snohomish County on BPA's EIM Invoice Timing Inquiry**

The Public Utility District No. 1 of Snohomish County (Snohomish) hereby submits comments in response to Bonneville Power Administration's (BPA's) request for feedback on EIM invoicing practices. At its March 13, 2019 EIM Stakeholder Meeting, BPA asked stakeholders to provide feedback by April 12, 2019 as to whether BPA should invoice potential EIM settlements based on CAISO's T+12B or T+55B settlement statements.

Snohomish found BPA's explanation of CAISO's settlement and invoice process and the relative merits of the two options to be helpful, and Snohomish does not have a strong preference between the two options at this time. Snohomish recognizes that the primary tradeoff would be more frequent resettlements and additional processing costs under the T+12B option versus delayed cash flow under the T+55B option. As BPA moves forward, Snohomish would like to better understand the expected magnitude and frequency of resettlements under the T+12B option relative to the T+55B option, which is partially driven by whether BPA would have final meter data available by T+8B.

Regardless of which invoicing option is ultimately chosen, Snohomish requests that BPA make CAISO settlement statements available to customers as timely as possible after they are received from CAISO, and no less frequently than weekly. Based on Snohomish's experience with non-participating resources located in another EIM Entity's BAA, Snohomish expects a substantial increase in the amount of settlement data to process and validate if BPA joins the EIM. Timely and frequent release of settlement data will enable customers to spread the corresponding increase in workload across the month and will help ensure any disputes can be submitted within CAISO's deadlines.

Snohomish appreciates the opportunity to provide input on specific decisions such as this that BPA would have to make if it were to join the EIM. We look forward to continuing to engage with BPA staff as it conducts its assessment and works through this stakeholder process.

Sincerely,

A handwritten signature in blue ink that reads "Anna Berg".

Anna Berg, Senior Manager Power Supply