



BPA's Transmission Access for EIM Participation

Public Generating Pool Comments

April 22, 2016

The Public Generating Pool (PGP) appreciates the information shared thus far by the Bonneville Power Administration (BPA) in its Transmission Access for Energy Imbalance Market (EIM) Participation stakeholder process and for the opportunity to provide comments. BPA specifically requested feedback on the Issues Log status and content and the meeting calendar.

PGP requests BPA develop a high-level timeline or schedule that includes key milestones. Such a timeline will better inform BPA and customers on an appropriate schedule for specific stakeholder meetings on this topic. PGP would like to see the following milestones included:

- Timing of the drafting and finalizing of proposals to enhance BPA's ability to manage transmission system congestion.
- Evolution process associated with BPA's calculation method for Variable Transfer Limits (VTLs), including how and when BPA intends to allocate VTLs to different dynamic uses.
- Development of BPA test cases and testing results from the California Independent System Operator's (CAISO) Market Simulation process.

PGP also requests that BPA provide quarterly updates that include the following topics:

- Changes to BPA modeling assumptions regarding the impacts of e-Tags on BPA's network and the generation used to resupply energy in the event of a curtailment, along with the impacts such changes have on customers.
- BPA's efforts to address data quality, network model accuracy and improvements to transmission system visibility and reliability.
- CAISO's performance in keeping flows within BPA's upper and lower limits.
- Impacts of EIM flows before, during and after BPA curtailment events. PGP appreciates BPA's consideration of these comments and looks forward to continued engagement on these important issues.