
Submitted via email to techforum@bpa.gov on November 10, 2020

RE: PPC Comments on October 28 EIM Implementation Workshop

PPC appreciates the opportunity to comment on BPA’s first workshop on implementation issues related to the agency’s potential participation in the Energy Imbalance Market (EIM) operated by the California Independent System Operator (CAISO). BPA’s effort to be transparent by holding these implementation workshops is commendable and we thank agency staff for engaging customers to discuss the various projects underway to support BPA’s EIM participation.

Related to these implementation efforts, the information provided for each project, including the objectives and key milestones, was very helpful. We look forward to continued discussion of these projects as they progress and offer some recommendations below on additional information that would be helpful in future workshops.

EIM Project Timelines

At the October 28 workshop, the timelines for several workstreams were provided as part of the “BPA EIM Integrated Program Roadmap.” These included overviews of the BPA public process, work performed by or with the CAISO, and BPA internal programs and process. All of these timelines were quite informative, and it will be useful to see them updated throughout the implementation process. PPC makes the following recommendations to make the BPA EIM Integrated Program Roadmap even more helpful.

First, as mentioned by customers at the workshop, it would be useful to provide more information on the customer’s role in this implementation process, including any areas where BPA may need to work with customers to ensure that systems and operations changes will not adversely impact customers’ operations. Second, for both the overall timeline and each of the specific projects identified by BPA, the agency should specify which of the milestones are critical to achieving on-time EIM participation (meaning, if they are missed, BPA’s go-live date would be in jeopardy). Lastly, in future iterations of the timeline, BPA should identify which EIM projects will be impacted by decisions made in the BP-22 and TC-22 proceedings and include those final decisions as milestones in the project timeline.

Additionally, PPC would like to better understand how the projects supporting EIM participation are impacting other planned projects at BPA. For instance, in the October 28 presentation, there is a reference to other grid mod projects that have been delayed in order to prioritize EIM work. It would be helpful to know which projects have been delayed, why they were delayed and the impact of those delays.

Future Topics

PPC continues to support further discussion on the “future topics” identified by BPA in the October 28 presentation and we look forward to working with agency in the ongoing EIM implementation workshops and other supplementary forums to address these issues.

In addition to the future topics already identified, PPC reiterates its request made during the TC/BP/EIM workshops that BPA develop a plan for regular reporting on its EIM participation to customers once it goes-live. In our previous comments, we have suggested that these reviews should be conducted quarterly to help BPA and customers understand the impacts of the agency’s EIM participation, to ensure there are not unintended consequences, and to identify any areas where potential policy changes may be needed. This approach is consistent with BPA’s position that “if Bonneville goes forward in joining the EIM, it will gain more data, experience, and visibility through EIM operations, and will reevaluate the need for future policies.”¹ This statement made in reference to BPA’s position on sub-allocation of the Resource Sufficiency requirement is true for all the policies BPA has developed to support its potential EIM participation. We invite additional discussions between BPA and customers to collaboratively develop expectations for regular reporting on EIM impacts.

Preparing for EIM Stakeholder Phase V Decision

PPC continues to support BPA’s five-phase decision process for EIM participation established with input from customers. At the October 28 workshop, BPA explained the need to make a final decision on its EIM participation earlier than originally expected. This shortened timeline will make it even more critical that customers and BPA have robust discussions on BPA’s final EIM decision in advance of the issuance of a draft decision letter.

PPC also continues to support the six EIM Participation Principles that the agency worked with customers to develop during the early phases of its EIM decision process. Prior to issuing its draft decision, BPA should work with customers to review whether its planned participation is still anticipated to be consistent with these principles given the additional information, analysis, and changes to EIM policies since the agency issued its Record of Decision on EIM Policy in September 2019. This updated assessment should include but not be limited to:

- An updated assessment of BPA’s business case;
- Confirmation that policies and rates established in the TC-22 and BP-22 proceedings are consistent with BPA’s principles; and
- Analysis and review of the August and September Energy Emergency Alert-3 events in the CAISO BAA. This review should include an analysis of whether these events indicate anything about potential impacts to EIM Entities and whether any EIM policy changes should be made prior to BPA’s participation to ensure the agency’s participation is consistent with its EIM Participation Principles.

¹ BPA EIM Phase III Decision Document, pg. 3

To date, BPA has worked extensively with customers to increase transparency and has provided opportunities for discourse throughout the EIM decision process. This fifth and final phase of the process is perhaps the most critical and should receive the same rigorous attention as previous phases. PPC looks forward to engaging with BPA on the questions above in advance of the agency's final EIM participation decision. We request that at the next implementation workshop BPA identify whether this implementation workshop series is the correct forum for these discussions or whether the agency will develop a separate stakeholder process to address these issues.

Conclusion

Thank you for the opportunity to submit these comments and again thank you to BPA staff for their hard work preparing for EIM participation and for extending the additional effort to communicate their progress to customers.