

June 2, 2020

Via Email: techforum@bpa.gov

Comments of Idaho Power Company Regarding Bonneville Power Administration's TC-22, BP-22, and EIM Phase III Workshop (held May 19, 2020)

Idaho Power Company ("Idaho Power") appreciates the opportunity to comment on Bonneville Power Administration's ("BPA") May 19, 2020 workshop. Idaho Power submits these comments on BPA's intertie studies presentation and alternatives.

In its slides on the intertie studies topic,¹ BPA describes that under alternative 1, as it is now proposed, BPA would modify its tariff to eliminate the requirement to perform studies of requests for service on the Southern Intertie ("Southern Intertie TSRs"). Instead, Southern Intertie TSRs would remain in BPA's queue awaiting service until available transfer capability ("ATC") is available, the TSR expires, or BPA offers a study agreement due to BPA having identified potential upgrades. BPA proposed draft tariff language to implement this alternative, which states that that studies would occur at "[BPA's] discretion."²

The proposed tariff language for alternative 1 provides significant discretion for BPA to decide whether and when to offer studies for Southern Intertie TSRs, without any ability for the customer to request a study or influence BPA's decision. Further, it appears that if BPA offered a study, the customer then would be required to participate in and fund the study or its request would be deemed withdrawn. BPA's discretion to offer studies, and the total lack of customer choice regarding the study, is not consistent with open access principles and appears to create risk of discriminatory or preferential treatment. As such, Idaho Power does not support alternative 1.

Alternative 2 appears to be a more reasonable approach. As Idaho Power understands alternative 2, BPA would modify its tariff to allow customers to request a study of a Southern Intertie TSR, which BPA would then perform. If the customer did not request a study, the Southern Intertie TSR would remain in the queue until it is offered ATC or it expires. Alternative 2 appears to provide valuable flexibility for customers, appears to adhere more closely to open access and nondiscrimination principles, and also appears to meet BPA's desire to modify its tariff to remove the requirement to study Southern Intertie TSRs for which it does not have ATC. If BPA chooses to further explore alternative 2, Idaho Power requests additional dialogue on how customer-requested studies would be performed and what assumptions would be made regarding earlier-queued requests. Customers who are willing to pay for a study and potentially for needed upgrades should be able to receive capacity.

As another option, Idaho Power would also support BPA retaining the current tariff language and complying with it (BPA's previously-identified alternative 3), as the current language is consistent with open access and nondiscrimination principles.

¹ See BPA's Presentation for May 19, 2020 EIM-Tariff-Rates Workshop, slides 50-68, [https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/19May2020-%20Main%20Tarrif-Rates-EIM%20Workshop%20\(Update%2021May\).pdf](https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/19May2020-%20Main%20Tarrif-Rates-EIM%20Workshop%20(Update%2021May).pdf)

² See *id.* at slides 63, 75, and 67 (proposed tariff language for alternative one, for tariff sections 15.2, 17.5, and 19.1).