



## **BPA EIM Stakeholder Meeting**

### **Public Generating Pool Comments**

**November 28, 2018**

The Public Generating Pool (PGP) appreciates the opportunity to comment on BPA's Energy Imbalance Market (EIM) Stakeholder meeting held on November 14, 2018. PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 4,500 MW of which is hydro. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining seven members have service territories within BPA's BAA. Nine PGP members purchase 37 percent of the requirements power sold by BPA.

PGP's comments are limited to the issues discussed at the November 14 meeting, namely BPA's process and timeline and market power mitigation.

#### **I. BPA EIM PROCESS AND TIMELINE**

PGP thanks BPA for its responsiveness to PGP's request to provide a draft schedule of which issues will be addressed during each of the public meetings between now and BPA's letter to the region, scheduled for July 2019. PGP also appreciates the scheduled Table Top exercises in Spring 2019. They will provide significant value in enhancing understanding of the impacts BPA's decision to join the EIM would have on differently situated customers.

In the November 14<sup>th</sup> meeting, PGP had asked if there would be a Record of Decision prior to BPA's decision to go live in the EIM. BPA's response was that there will be multiple decision points along the way subsequent to BPA signing the EIM Implementation Agreement but BPA was not sure at this time either the format of those decision points nor a sense of the timing for customer comments. PGP requests BPA provide at the December 18 EIM Stakeholder meeting its conclusion on the decision points it has once the EIM Implementation Agreement is signed, the format of those decision points and what opportunities customers will be given to provide comment.

#### **II. MARKET POWER MITIGATION**

PGP supports BPA's active participation in the existing CAISO stakeholder process and appreciates the fact that BPA will delay EIM Go Live until the Local Market Power Mitigation/Default Energy Bid issues are satisfactorily resolved. PGP looks forward to further discussion on this topic as the CAISO stakeholder process progresses. CAISO's Final Local Market Power Mitigation Enhancements Proposal is scheduled to be presented to the EIM Governing Body and CAISO Board of Governors for decision in March 2019. PGP requests BPA

Comments submitted by:

Laura Trolese, [ltrolese@publicgeneratingpool.com](mailto:ltrolese@publicgeneratingpool.com), (360) 513-6465

Therese Hampton, [thampton@publicgeneratingpool.com](mailto:thampton@publicgeneratingpool.com), (360) 852-7366

provide an update at the February 20<sup>th</sup> EIM Stakeholder meeting of BPA's conclusion regarding whether CAISO's Final Proposal satisfactorily resolves BPA's concerns.

Additionally, BPA stated that it plans to develop tools that avoid unintended dispatch. PGP requests more information regarding the nature of these tools and what impact using the tools would have on loads and resources within BPA's Balancing Authority Area.

### III. CONCLUSION

PGP has found the information provided and discussions at the public meetings to be very helpful. We look forward to future discussions and meetings.

#### **Public Generating Pool**

Benton PUD / Chelan County PUD / Clark Public Utilities / Cowlitz County PUD / Eugene Water & Electric Board  
Grant County PUD / Klickitat County PUD / Lewis County PUD / Snohomish County PUD / Tacoma Power