



November 20, 2020

*Via Electronic Submission*

John Hairston  
Interim Administrator and Chief Executive Officer  
Bonneville Power Administration  
911 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

**Re: October 28, 2020 EIM Implementation Kickoff Workshop**

Dear Administrator Hairston:

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide feedback regarding Bonneville Power Administration’s (“BPA or “Agency”) October 28, 2020 Energy Imbalance Market (“EIM”) Implementation Kickoff workshop. BPA’s dedication to transparency with customers throughout the EIM process is evident and AWEC appreciates the Agency’s continued communication with stakeholders.

During the October 28th workshop BPA presented customers with an overview of the five EIM-specific grid modernization projects that include: 1) EIM Bid and Base Scheduling, 2) EIM Real Time Operations, 3) EIM Settlements and Implementation, 4) EIM Testing Program, and 5) EIM Training Program. According to the Agency’s key milestone dates, in January 2021 draft business process development will be completed, in February 2022 the EIM settlements system and process training will be completed, and in March 2022 the EIM settlements system testing will be completed in anticipation for the March 2022 go-live date. During the workshop discussion, we understood that detailed EIM settlements training for customers and stakeholders was not intended to occur until the very end of the process, likely in the January-March 2022 timeframe. This mere three month period is concerning.

To increase the likelihood of success for customers and non-federal resource owners directly impacted by the new systems and process that have customer and resource owner touch points, AWEC requests BPA provide additional time for customers to learn more about these systems and process so that they can develop and retool their own updated systems and processes to reflect these changes and test them in a pilot environment. A pilot environment—or something similar—will provide impacted customers with the ability to ensure their own systems and processes are adequately prepared for the March 2022 go-live date. Such preparation will minimize the probability of oversights for both the Agency and its customers and mitigate concerns regarding the abovementioned three month period.

*/s/ John Carr*  
Executive Director  
Alliance of Western Energy Consumers