



JUNE 17 WORKSHOP RESPONSES

July 16, 2021

COMMENTS

Topic	Comment Summary	BPA Response
Market isolation process	BPA should establish clear expectations about what occurs if BPA temporarily isolates from the market in its business practice.	BPA needs the ability to react nimbly to various market situations as they arise. BPA will notify customers of any actions in this area, but BPA does not plan to create a process or business practice to address when BPA might take actions that result in temporary market isolation.
	During the workshop and in written comments, BPA was provided with feedback on the settlements data and what customers would like to see.	BPA appreciates the comments, suggestions and requests on settlements; however, BPA does not have answers for them at this time. If BPA decides to join the EIM, BPA will pick up settlements discussions this fall and will address feedback at that time.

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Market exit public process	BPA should establish a process for if it decides to exit the EIM permanently and document it in the Phase V letter or EIM business practice.	<p>BPA understands that permanent market separation could significantly impact customers, and if BPA determines that permanent market separation is necessary it will share information and collaborate with customers as much as possible. In addition, the EIM Entity Agreement requires an EIM Entity to give 180 days notice before market termination is effective, and BPA would coordinate with customers during that time.</p> <p>Note that an important criteria for BPA joining the EIM is the voluntary nature of the market and that BPA may choose to separate from the market temporarily or permanently as BPA determines is necessary given the circumstances. Therefore, BPA does not plan to create a defined process that it will follow to determine whether to permanently exit the market.</p>

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Rates	BPA should provide assurance to customers on how it will quantify the benefits of participation and include those benefits in Power rates going forward rather than waiting until pre-rate case workshops where customers have no assurance of how they will be handled.	BPA understands that this issue is of utmost importance to customers, and BPA is committed to working with customers to determine what EIM data is available and useful to track benefits. BPA is committed to working with customers in pre-rate case workshops to explore methods to quantify benefits for purposes of ratemaking, and customers will have an opportunity to provide input on proposed benefits at that time.
Reporting	Comments requested BPA commit to reporting and work with customers to finalize what metrics will be included in reporting ahead of the final EIM participation decision.	BPA commits to providing ongoing reporting on EIM performance. The content of such reporting is a work in progress and will be better informed once BPA is participating in the EIM and has a more comprehensive understanding of the data that will be available. BPA is also committed to continuing this discussion this fall to share an understanding of the CAISO-provided metrics and work through customers' concerns regarding the use of those metrics.

RESPONSES

Question	BPA Response
Will generic EIM settlement statements be available for review during the October/November training?	Yes, BPA anticipates that generic statements will be available.
Are there plans to test the intra-change process?	Unlike interchange testing, intrachange testing will be limited and there is not a formal testing plan at this time. If there is an interest in intrachange testing, please contact gridmod@bpa.gov .
Can BPA indicate how and during which phases Slice customers should expect to engage in testing?	BPA has not specified any specific Slice testing at this time, but any required testing would be discussed and coordinated through the Slice Implementation Group. Questions specific to Slice testing can be sent to SliceSupport@bpa.gov .

For more information,
visit www.bpa.gov/goto/eim.

