



Customer Group

Slice Customer Group Comments on Bonneville Power Administration's August 25 & 26, September 29, and October 7, 2020 TC-22, BP-22 and EIM Phase III Workshops

The Slice Customer Group appreciates the opportunity to provide comments on Bonneville Power Administration's (Bonneville) August 25 & 26, September 29, and October 7, 2020 TC-22, BP-22 and EIM Phase III Workshops. Below are a few comments on select topics.

1. Off-the-Top Non-Regulation Reserves: As noted in prior comments, the Slice Customer Group supports *Off-the-Top Option 1* for BP-22 (see *TC-22, BP-22 and EIM Phase III Customer Workshop – July 29 & 30, 2020 Day 2 and 3* presentation; slides 92-96). With respect to apportioning costs and benefits of EIM participation between deployment of balancing reserves and non-slice resources (see *TC-22, BP-22 and EIM Phase III Customer Workshop – August 26, 2020* presentation; slides 145-146) the Slice Customer Group favors the “balancing reserves first” approach over the “pro-rata” approach. The Slice Customer Group does not support the “non-slice inventory first” approach.
2. Allocation of EESC Costs from Transmission Services to Power Services: The Slice Customer Group suggests that BPA consider whether it is feasible to allocate charge codes associated with load only to Load Following customers (see *TC-22, BP-22 and EIM Phase III Customer Workshop – August 26, 2020* presentation; slide 150). Since the Block product is a fixed schedule with no uncertainty, it will not incur imbalance, over/under scheduling charges, or neutrality codes. If this is not possible in BP-22, the Slice Customer Group suggests that BPA monitor and report on the charges and credits and reconsider the decision in BP-24.
3. Persistent Deviations: The Slice Customer Group considers the penalty charge bands for persistent deviations under EIM to be unnecessary (see *TC-22, BP-22 and EIM Phase III Customer Workshop – September 29, 2020* presentation; slide 121), and this convention could be removed for BP-22 (Alternative 2). The existence of these penalties requires customers to track deviations and potentially adjust schedules to avoid incurring them. If retained and modified for BP-22 (Alternative 3), then the Slice Customer Group would propose retaining the 12-hour and 24-hour penalty bands and eliminating the 4-hour and 6-hour penalty bands. In either case, the penalty convention should be reconsidered in BP-24 based on observed behavior.
4. Intrachange Imbalance: The Slice Customer Group appreciates and supports the proposed addition in the EIM Rate Schedule language regarding Intrachange Imbalance and the associated Intrachange Imbalance Adjustment see *TC-22, BP-22 and EIM Phase III Customer Workshop – September 29, 2020 and October 7, 2020* presentation; slides 92-



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106. The Slice Customer Group further supports the voluntary nature of applying the Intrachange Imbalance Adjustment.

The Slice Customer Group consists of:

Benton PUD; Clark Public Utilities; Clatskanie PUD; Cowlitz PUD; Emerald PUD; Eugene Water and Electric Board; Franklin PUD; Grays Harbor PUD; Idaho Falls; Lewis PUD; Pacific PUD; Snohomish PUD; Tacoma Power.