

UNITED STATES OF AMERICA
U.S. DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

Proposed Modifications to Open
Access Transmission Tariff

BPA Docket No. TC-22

Attachment 1
To the Direct Testimony of POWEREX CORP.

WITNESS: Raj Hundal

January 29, 2021

DATA REQUEST NUMBER: PX-BPA-31-1

DATE OF RECEIPT OF REQUEST: 1/11/2021

DIRECTED TO: TC-22-E-BPA-01

REQUESTOR'S NAME: Tyler Johnson

AGENCY: Powerex Corporation

PAGE(S): 10, 11

LINE(S): 1.32 1.34 1.35

DATA REQUEST:

The proposed tariff includes new definitions for "EIM Entity" and "EIM Transfers." Please confirm that these definitions include participating EIM entities that are not balancing authorities, such as the Canadian EIM Entity, Powerex.

For technical questions about this request please contact Connor Curson. Phone: (604.891.6028) Email: (Connor.Curson@powerex.com)

For legal questions about this request please contact Tyler Johnson. Phone: (206.204.6211) Email: (tyler.johnson@bracewell.com)

RESPONSE:

The proposed tariff definitions for "EIM Entity" and "EIM Transfers" reflect the language in Portland General Electric's tariff as well as the Market Operator's tariff. BPA did not intend to exclude the Canadian EIM Entity, Powerex, from these definitions. We are willing to adjust this language to make it clear that Powerex is not excluded.

We propose the language below for the definitions of "EIM Entity" and "EIM Transfer." In lieu of BPA submitting a motion to modify the tariff language to reflect this proposal, which may require changes to the procedural schedule, we request that Powerex's direct case include this proposed language, indicate support or raise any objections to this language, or propose alternative tariff language, if needed. We also invite the other TC-22 parties to indicate their support for or raise any objections to the proposed language in their direct cases. Under our requested approach, we note that parties would also have an opportunity to respond to Powerex's direct case in rebuttal testimony.

1.34 EIM Entity:

(a) A BA, other than the BPA EIM Entity, that enters into the MO's EIM Entity Agreement to enable the EIM to occur in its BAA; (b) the Canadian EIM Entity.

1.35 EIM Transfer:

The transfer of real-time energy resulting from a Dispatch Instruction: (1) between the BPA BAA and the CAISO BAA; (2) between the BPA BAA and an EIM Entity BAA or Canadian EIM Entity; or (3) between the

CAISO BAA and an EIM Entity BAA or Canadian EIM Entity using transmission capacity available in the EIM; or (4) between an EIM Entity BAA or Canadian EIM Entity and any other EIM Entity BAA or Canadian EIM Entity using BPA transmission capacity made available in the EIM.

For technical questions about this response, please contact Tracey Salazar by phone 360-619-6028 and/or email tsalazar@bpa.gov.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing on January 29, 2021 by uploading it to the Bonneville Power Administration's secure website. Pursuant to Section 1010.10(a) of the Rules of Procedure of the Bonneville Power Administration, such filing constitutes service on all Litigants.

Submitted by,

/s/ Tyler S. Johnson

Tyler S. Johnson

Counsel for Powerex Corp.