



## Department of Energy

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EXECUTIVE OFFICE

In reply refer to: K-7

### Phase III Final Decision Document

#### Introduction

The Energy Imbalance Policy Record of Decision (EIM Policy ROD) described a five-phase process that Bonneville will use to evaluate whether to participate in the Western Energy Imbalance Market (EIM).<sup>1</sup> Bonneville completed Phase II of this process with the publication of the EIM Policy ROD in September of 2019. Phase III encompasses the policy development that has occurred between September 2019 and the beginning of the BP-22 and TC-22 proceedings. This involved multiple workshops in which Bonneville discussed EIM policy details with stakeholders and used the feedback from those workshops to develop policy decisions/proposals on the details of how Bonneville will participate in the EIM, if it ultimately decides to join the EIM. Many of these policies require rate changes or tariff language and will be further developed in the BP-22 or TC-22 processes (Phase IV). Bonneville identified four discrete policy issues<sup>2</sup> that do not implicate rate or tariff changes, and proposed its decisions on these issues in a Draft Phase III Decision Document.<sup>3</sup> Bonneville received stakeholder comments on those proposed decisions.<sup>4</sup>

This Final Phase III Decision Document addresses stakeholder comments and provides Bonneville's final decision on each of the four Phase III issues. As with the decisions that were made in the EIM Policy ROD, Bonneville considers the decisions made in this Final Phase III Decision Document to be final decisions that will become ripe for challenge if Bonneville makes a final decision to join the EIM in Phase V of the decision process.

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<sup>1</sup> EIM Policy ROD at 29-36. The EIM Policy ROD can be accessed at:

<https://www.bpa.gov/news/pubs/RecordsofDecision/rod-20190926-Energy-Imbalance-Market-Policy.pdf>.

<sup>2</sup> The issues include: Sub-allocation of Balancing Authority Area Resource Sufficiency Requirements; Timing of Non-Federal Resource Participation; Metering Requirements; and EIM Losses.

<sup>3</sup> The Draft Phase III Decision Document can be accessed at: <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/Draft%20EIM%20Phase%20III%20Decision%20Document.pdf>.

<sup>4</sup> Comments to the Draft Phase III Decision Document can be accessed at:

<https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Pages/Customer-Comments.aspx>. Comments to the Phase III close out letter are included in the section titled "TC-22, BP-22 and EIM Phase III August 25-26 Workshops (Sept. 18 Feedback Deadline)."

In the EIM Policy ROD, Bonneville explained that “making decisions in each phase of Bonneville’s process is critical to progressing forward in the discussion on joining the EIM.”<sup>5</sup> These Phase III decisions are part of this ongoing EIM discussion.

The EIM Policy ROD also established the EIM participation principles.<sup>6</sup> In Phase V, Bonneville and its stakeholders will have the entire package of EIM policy decisions to measure against these principles for purposes of making the final decision on EIM participation.

The format for the decisions set forth below follows the format that Bonneville uses in its formal records of decision that: identify the issue, provide background on the issue, provide Bonneville staff’s position, provide customers’ positions, provide an evaluation of the positions, and conclude with a decision statement. Following the Phase III Decisions, Bonneville provides a brief National Environmental Policy Act analysis of the decisions. Finally, Bonneville concludes this decision document with an update to its schedule for making a decision whether to join the EIM in Phase V.

### **Phase III Decisions**

#### **A. Sub-Allocation of Balancing Authority Area Resource Sufficiency Requirements**

*Issue 1: Whether Bonneville should sub-allocate balancing authority area resource sufficiency scheduling requirements for the start of EIM participation.*

#### **Background**

In order to fully participate in the EIM, the Bonneville balancing authority area as a whole needs to pass the EIM resource sufficiency (RS) tests ahead of each operating hour. The RS tests include the transmission feasibility test, the balancing test, the bid range capacity test, and the flexible ramp sufficiency test. While Bonneville schedules Federal generation and has an obligation to serve a significant portion of the load in the balancing authority area, other load serving entities and independent generators can significantly contribute to the outcome of the RS tests.

Bonneville already has the framework to cover the majority of requirements associated with each test, except for the balancing test. The balancing test requires Bonneville to show that the balancing authority area has enough energy scheduled to meet forecasted loads in the balancing authority area, or be subject to financial penalty. If the sum of generation and interchange base schedules in the balancing authority area are not within one percent of the CAISO’s area load forecast and not within five percent of the actual load, then the Bonneville balancing authority area

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<sup>5</sup> EIM Policy ROD at 47.

<sup>6</sup> *Id.* at 49-54.

would incur an over- or under-scheduling penalty.<sup>7</sup> There is currently no requirement that the sum of individual load serving entity obligations balance to a balancing authority area load forecast. As such, Bonneville has evaluated the need to adopt sub-balancing authority area RS requirements to meet the balancing test.

### **Bonneville Staff's Position**

Staff considered the possibility of sub-allocating the CAISO's area load forecast to load serving entities and itself, and requiring load serving entities in Bonneville's balancing authority area to schedule to that value. Such a policy would require unique tariff language and the exploration of consequences (most likely a penalty rate) for load serving entities that do not schedule to the required load forecast. However, Staff is unaware of any other EIM Entity that sub-allocates the CAISO's area load forecast, so there is no model or industry standard to look to for guidance.<sup>8</sup>

### **Commenters' Positions**

PPC and Shell Energy both submitted comments in support of Bonneville's proposed decision not to adopt any sub-balancing authority area RS scheduling policies for the start of EIM participation.<sup>9</sup> PPC encourages Bonneville to study the costs and benefits to preference customers when Bonneville adjusts the Federal system to ensure passage of the RS tests.<sup>10</sup>

### **Evaluation of Positions**

Bonneville appreciates both PPC and Shell Energy's support of Bonneville's proposed decision. If Bonneville goes forward in joining the EIM, it will gain more data, experience, and visibility through EIM operations, and will reevaluate the need for future policies regarding RS.

### **Decision**

*Bonneville will not adopt any sub-balancing authority area RS scheduling policies for the start of EIM participation.*

## **B. Non-Federal Resource Participation**

*Issue II: Whether Bonneville should delay non-Federal resource participation from Bonneville's projected March 2022 go-live date.*

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<sup>7</sup> Draft Phase III Decision Document at 3.

<sup>8</sup> *Id.* at 4.

<sup>9</sup> PPC Comments at 2; Shell Energy Comments at 2.

<sup>10</sup> PPC Comments at 3.

## **Background**

EIM Entities allow generators within their balancing authority areas to participate in the EIM as participating resources upon completion of an application and testing process. EIM participation will require certain operational and technical modifications, and generator owners must sign agreements with the CAISO in order to submit bids and receive settlements.<sup>11</sup> Non-Federal generators located in the Bonneville balancing authority area will have the ability to participate in the EIM. Bonneville believes this will ultimately be a significant benefit for some of its customers that own flexible resources.

## **Bonneville Staff's Position**

Staff is working with the CAISO on multiple system implementation issues that are required to start up EIM participation for Bonneville's balancing authority area. Resolving the system implementation issues related to allowing non-Federal generators to participate, in addition to the work required to go-live, would add a significant layer of complexity. Implementing the EIM requires a very large amount of configuration, data preparation, registrations, business process changes, system development, integration, and testing that must be carried out in a tightly coordinated fashion. Staff is unaware of any other EIM entity that enabled third-party participating resources at the outset.

Bonneville staff is in favor of non-Federal generators participating in the EIM. However, the complexity and technical challenges—resulting from Bonneville's size, number of adjacent EIM entities, number of interchanges, and other factors—will be complex enough without enabling non-Federal generator participation. Bonneville does not believe it is feasible to tackle the issue at this time.<sup>12</sup>

## **Commenters' Position**

EWEB states that it has “maintained a desire to participate in the EIM on day one of go-live,” and that it would be more efficient and beneficial to work with interested non-Federal generators now to get the systems and processes in place rather than six months after go live, when Bonneville will be focused on day-to-day operations.<sup>13</sup> EWEB also requests that Bonneville make its vendor, PCI, available to work with customers on the requirements necessary to enable participation.<sup>14</sup>

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<sup>11</sup> Draft Phase III Decision Document at 4.

<sup>12</sup> *Id.* at 4-5.

<sup>13</sup> EWEB Comments at 4-5.

<sup>14</sup> *Id.* at 5.

Alternatively, EWEB argues that Bonneville should discuss “financial risk mitigation mechanisms” for customers if Bonneville proceeds with the delay.<sup>15</sup>

PPC acknowledges the difficulty in implementing non-Federal resource participation, but states that in order to address “potential issues of inequity,” Bonneville “should work with non-federal resources interested in participating in the EIM to mitigate the impact of the proposed six-month delay for non-federal EIM participation.”<sup>16</sup> PPC also comments that Bonneville should work to ensure that the delay does not last longer than six months.<sup>17</sup>

WPTF argues that a six-month delay “is unduly discriminatory and does not provide fair and open access to the EIM,” and that no other EIM entity has implemented such a restriction.<sup>18</sup> WPTF asserts that while there have been very few participating resources that have joined the EIM when an EIM Entity goes live, Bonneville should not adopt a blanket restriction.<sup>19</sup> Instead, WPTF suggests Bonneville survey entities interested in becoming participating resources to determine how big of a lift it would be.<sup>20</sup> WPTF also expresses concern with the precedent of restricting third-party generators from accessing future markets.<sup>21</sup>

### **Evaluation of Positions**

Bonneville appreciates the concerns expressed by EWEB, PPC, and WPTF about providing non-Federal generators the opportunity to become participating resources in the EIM at the outset of EIM operations if Bonneville decides to join the EIM. Bonneville is persuaded by commenters to remove an express provision delaying the ability of non-Federal generators to become participating resources.

If Bonneville makes the final decision to join the EIM, Bonneville believes that it can meet obligations to allow non-Federal generators to apply to become participating resources. Supporting non-Federal participating resources joining simultaneously with Bonneville does create a risk of delay in the projected go-live date.

Once Bonneville determines what requirements are needed for the non-Federal generator to participate in EIM, much of the work will be the non-Federal generator’s or customer’s obligation. The customer will need to find a Scheduling Coordinator, work with the CAISO, and potentially update its metering and communications equipment, along with any other necessary actions. Prior

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<sup>15</sup> *Id.*

<sup>16</sup> PPC Comments at 3.

<sup>17</sup> *Id.*

<sup>18</sup> WPTF Comments at 1-2.

<sup>19</sup> *Id.* at 2.

<sup>20</sup> *Id.*

to submitting an application to be a Participating Resource, the customer should thoroughly assess the work required become a Participating Resource. If Bonneville joins the EIM, non-Federal entities will be allowed to submit their applications to join the EIM in Bonneville's balancing authority area consistent with the timing of other EIM Entities.

Consistent with the approach other EIM Entities have taken, Bonneville will accept applications for third-party resource participation starting 7 days prior to the beginning of Bonneville's Parallel Operations testing period. Prior to that time, Bonneville will make available to interested parties an inventory of activities and actions that are required to enable customers to meet the requirements of Participating Resources. The application process will include a 45-day assessment period to evaluate the application, verify that the necessary systems are in place, and establish a plan for supporting and certifying the Participating Resource request.

Bonneville believes market participation from non-Federal resources will ultimately help the EIM be more robust and liquid. However, Bonneville and the region must be willing to recognize the amount of technical and project management work necessary to allow an organized market to operate in the region. The region must also recognize the amount of work the CAISO must undertake to potentially bring on six EIM Entities in a single year, especially when considering the size and complexity of Bonneville's balancing authority area.<sup>22</sup> After BPA has experience with its participation in EIM, it anticipates being able to better support and assist non-Federal resources with their market participation.

### **Decision**

*Bonneville will not include in its Tariff language delaying the application process for non-Federal Participating Resources.*

### **C. Metering Requirements**

*Issue III: Whether further action is necessary for generators or loads in Bonneville's Balancing Authority Area to comply with the CAISO's metering requirements.*

### **Background**

Bonneville's metering specifications are equivalent to the CAISO's requirements in order to enable accurate settlements.<sup>23</sup>

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<sup>21</sup> *Id.*

<sup>22</sup> Avangrid, Avista, Tacoma Electric Power, Tucson Electric, and Xcel Energy are also currently scheduled to go-live in the spring of 2022.

<sup>23</sup> Draft Phase III Decision Document at 5.

### **Bonneville Staff's Position**

After further examination of Bonneville's metering specifications and the CAISO's requirements, Staff does not believe any further action is necessary for either generators or load in the balancing authority area.

Generators and load in Bonneville's balancing authority area should already meet Bonneville's current metering technical standards, as documented in STD-000001 "Technical Requirements for Interconnection" and STD-DC-000005 "Meter Application Guide." These requirements are sufficient for EIM use. Therefore, as long as generators and load have met Bonneville's metering technical standards, no further action is required.<sup>24</sup>

### **Commenters' Positions**

Bonneville received one supportive comment from PPC. PPC states that is pleased with Bonneville's position that additional meter requirements for generation and load will not be necessary for EIM participation. To the extent there are any changes in the metering requirements, PPC states that Bonneville should give customers significant advance notice to implement any needed upgrades.<sup>25</sup>

### **Evaluation of Positions**

Bonneville received a single set of comments on this issue, which were in support of Bonneville staff's position. As set forth above in staff's position, loads and generation within Bonneville's balancing authority area should not have any additional metering requirements if Bonneville decides to participate in the EIM.

### **Decision**

*No further action is necessary for generators or loads in Bonneville's Balancing Authority Area to comply with the CAISO's metering requirements if Bonneville decides to participate in the EIM.*

#### **D. EIM Losses**

*Issue IV: Whether Bonneville should determine the loss factor (or percentage) for EIM participation as an internal implementation matter.*

### **Background**

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<sup>24</sup> *Id.*

<sup>25</sup> PPC Comments at 3-4.

The EIM does not provide system or balancing authority area losses associated with base schedules, but considers losses when ensuring each balancing authority area is balanced prior to the hour as part of the base scheduling and Resource Sufficiency (RS) processes. The EIM also takes into consideration marginal, or incremental/decremental, losses that result from market awards and dispatches in the process of ensuring each EIM balancing authority area is balanced. Under current market rules, Bonneville must provide an EIM loss factor to the CAISO in order for the CAISO to establish a Load Base Schedule (LBS) for settlement purposes. The LBS is used as a reference for the determination of load Uninstructed Imbalance Energy (UIE), as well as the Unaccounted for Energy (UFE) charge code and the Real Time Imbalance Energy Offset (RTIEO) neutrality charge code.<sup>26</sup>

### **Bonneville Staff's Position**

While the settlement of UIE, UFE, and RTIEO will be discussed as part of the TC-22 and BP-22 proceedings, the net settlement of UIE, UFE, and RTIEO does not materially change based on the loss factor supplied to the EIM. Therefore, Bonneville will determine the loss factor to provide to the CAISO, but there is no cost allocation decision to make regarding losses.

EIM losses are separate and distinct from transmission losses. Issues related to transmission losses should be decided in the BP-22 and TC-22 proceedings.<sup>27</sup>

### **Commenters' Positions**

NIPPC states that it is “concerned with [Bonneville’s] proposal to allocate EIM losses to wheeling customers through an allocation of the [RTIEO] charge code.” It asserts that the RTIEO is “intended to cover the incremental losses in the balancing area resulting from EIM transfers.” Wheeling customers compensate Bonneville for transmission losses associated with their schedule and do not contribute to the balancing authority area’s incremental losses resulting from EIM activity.<sup>28</sup> Any benefits wheeling customers receive from congestion management or other “qualitative” changes resulting from the EIM are not sufficient to justify allocating a share of the RTIEO charge code to those customers.<sup>29</sup> Thus, NIPPC asserts that it is inconsistent with cost-causation principals to allocate a portion of the RTEIO charge code to wheeling customers.<sup>30</sup>

PPC requests confirmation of its understanding that BPA proposes no changes to its current transmission loss methodology in response to the “EIM losses” issue. PPC states there is not

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<sup>26</sup> Draft Phase III Decision Document at 5.

<sup>27</sup> *Id.*

<sup>28</sup> NIPPC Comments at 1.

<sup>29</sup> *Id.* at 2.

<sup>30</sup> *Id.*



enough information to provide additional comment on Bonneville’s proposed decision to determine the loss percentage used by the EIM as internal implementation issue.<sup>31</sup>

PPC further states that Bonneville’s proposal to not specifically charge for losses on EIM transfers, but to instead recover those costs from measured demand is likely reasonable. Like other aspects of the agency’s initial participation, Bonneville should commit to quarterly reports on the costs resulting from losses on EIM transfers to ensure this cost is reasonable and commensurate with the benefits received from EIM dispatches.<sup>32</sup>

### **Evaluation of Positions**

Before addressing the specific positions set forth above, it is worth noting a recent development occurring at a CAISO stakeholder initiative that may render this issue moot for Bonneville and its customers. The CAISO is proposing through its Real-Time Settlement Initiative to allow EIM Entities that use a “load derivation” approach for calculating a balancing authority area load meter (*i.e.*, a top down, or generation minus interchange, approach) to elect not to settle UFE given there is no “unaccounted for” energy in that scenario.<sup>33</sup> Bonneville uses a load derivation method for determining balancing authority area load and would most likely elect not to settle UFE if it decides to participate in the EIM. Thus, if the CAISO moves forward with its proposal, it would most likely make this a moot issue before Bonneville would go live in the EIM in 2022.

Under the CAISO’s proposal, if an EIM Entity elects to not settle UFE, the EIM Entity will continue to account for base schedule losses outside of the market based on their existing loss mechanisms (*e.g.*, OATT transmission losses, bi-lateral contracts, etc.). The EIM Entity and CAISO settlements will not incorporate losses by assuming a loss factor of zero. The CAISO will apply this zero loss factor when calculating the hourly load base schedule. In addition, the EIM entity will apply the same zero loss factor in the load derivation meter calculation. The ISO will then exclude the EIM balancing authority area from calculation of the UFE amount. Under this option, a loss factor of something other than zero is no longer required to be supplied to the market, and the overall impact on the EIM Entity would be a more appropriate and accurate settlement of load UIE and RTIEO while avoiding the unnecessary complexity and inaccurate settlement of UFE.

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<sup>31</sup> PPC Comments at 2.

<sup>32</sup> *Id.*

<sup>33</sup> See CAISO, Real-Time Settlement Review, Draft Final Proposal, at 14-15 (Oct. 21, 2020), available at <http://www.caiso.com/InitiativeDocuments/DraftFinalProposal-Real-TimeSettlementReview.pdf>. For more information on the CAISO’s Real-Time Settlement Initiative, see <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Real-time-settlement-review>.

Bonneville filed comments in support of the CAISO's Real-Time Settlement Initiative.<sup>34</sup> Based on a review of stakeholder comments, it appears that they have generally been supportive of the CAISO's proposal. Thus, Bonneville is optimistic that the proposal will be adopted and this issue will become moot for Bonneville's participation in the EIM.

In the event that the CAISO does not move forward with its proposal, staff's position is that even under current market rules the net settlement of UIE, UFE, and RTIEO does not materially change based on Bonneville's loss factor. Thus, there is no cost allocation decision to make regarding what loss factor/percentage Bonneville chooses to use.

In regard to specific customer comments described above, NIPPC's comments regarding whether the RTIEO charge code should be allocated to wheeling customers is a rate case issue. NIPPC's cost-allocation concerns should not be conflated with this issue, which addresses how Bonneville determines what loss factor/percentage to use for EIM participation. Again, there is no cost allocation decision for Bonneville to make regarding the EIM loss factor/percentage. The net settlement of UIE, UFE, and RTIEO does not materially change based on losses.

PPC's understanding that Bonneville is not proposing any changes to its current transmission loss methodology in response to this discrete issue is correct. EIM loss factors/percentages are separate and distinct from transmission losses. There have been discussions regarding transmission losses in the BP-22 and TC-22 cases. Bonneville acknowledges PPC's statement that there is not enough information regarding EIM losses to provide additional comments. If Bonneville ultimately decides to participate in the EIM and gains additional knowledge regarding EIM losses via that participation, it may decide to revisit how it determines EIM loss factors/percentages for market participation. Moreover, as explained above, if the CAISO Real-Time Settlement Initiative moves forward then the issue regarding EIM loss factors becomes moot. Finally, in regard to PPC's request that Bonneville provide quarterly reports on the costs resulting from losses on EIM transfers, Bonneville will address this issue in workshops leading up to the BP-24 and TC-24 proceedings.

### **Decision**

*Bonneville will determine the loss factor/percentage used for EIM participation as an internal implementation issue if Bonneville decides to join the EIM, assuming this issue is not moot due to the CAISO's Real-Time Settlement Initiative.*

## **National Environmental Policy Act Analysis**

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<sup>34</sup> Bonneville's comments can be accessed at:  
<https://stakeholdercenter.caiso.com/StakeholderInitiatives/AllComments/c74ef0cb-f11c-4fc6-94e3-37966c1a1741#org-8a48a64e-6e9e-4684-902f-8285f913686e>.

Bonneville has assessed the potential environmental effects from the proposed EIM Phase III policy decisions, consistent with the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 et seq.

As discussed in this decision document, Issue I involves consideration of an option for administratively managing the Bonneville balancing authority area for resource sufficiency requirements, with a decision not to pursue that option at this time. Issue II also is an administrative management issue, involving a decision to not delay the participation in the EIM of non-Federal generators within the Bonneville balancing authority area. Issue III involves a decision that no new procedural or administrative requirements for metering – used to enable accurate financial settlements – are necessary to participate in the EIM. Finally, if Issue IV is not moot, it involves a decision concerning administrative procedures for calculating EIM losses in order to ensure proper financial settlement. None of these decisions involve any proposed new facilities, changes in existing generator operations, or physical changes beyond previously disturbed or developed facility areas.

All four of the policy issues being decided upon in this Phase III decision document thus involve strictly administrative and procedural actions that are not expected to result in reasonably foreseeable environmental effects. Accordingly, Bonneville has determined that these four policy decisions do not require further consideration or documentation under NEPA.

As discussed in the next section below, a final decision by Bonneville on whether to join the EIM will be made in 2021. Appropriate NEPA analysis and documentation will be conducted prior to making that final agency decision about joining the EIM.

#### **Update to Bonneville's EIM Project Schedule**

In the EIM ROD, Bonneville described and decided upon a five-phase decision process regarding whether to ultimately join the EIM.<sup>35</sup> Phase V is a culmination of the earlier phases in which Bonneville will make a final decision whether to join the EIM and proceed with EIM operations.<sup>36</sup> In the EIM ROD, Bonneville identified the timeframe for Phase V to be October 2021 to December 2021.<sup>37</sup> Bonneville has had subsequent conversations with the CAISO regarding the project schedule as part of its ongoing EIM implementation work. The CAISO has informed Bonneville that before parallel operations with the CAISO can begin, Bonneville must execute an EIM Entity Agreement and the Federal Energy Regulatory Commission (FERC) must approve the agreement. FERC approval can take up to sixty calendar days. Therefore, in order for parallel operations to begin on December 1, 2021, Bonneville must execute the EIM Entity Agreement no later than

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<sup>35</sup> EIM ROD at 29-36.

<sup>36</sup> *Id.* at 33.

<sup>37</sup> *Id.*

October 1, 2021, so FERC has sixty calendar days to approve it. This is necessary if Bonneville is going to meet its projected March 2022 go-live date.

Bonneville will only execute an EIM Entity Agreement after it makes a final decision in Phase V. Thus, Bonneville must move its anticipated Phase V final decision forward to no later than September 30, 2021. In practical terms, this means that Bonneville will initiate Phase V immediately after the BP-22 and TC-22 proceedings conclude at the end of July 2021 and will issue the final Close Out Letter by September 30, 2021, so that, in the event it decides to join EIM, it can sign the EIM Entity Agreement and allow the CAISO to file it with FERC for approval by October 1, 2021.

### **Conclusion**

Bonneville greatly appreciates the stakeholder engagement in this phase of the overall decision-making process and the thoughtful comments submitted. Bonneville has considered all of the comments received and has reached the decisions set forth in this decision document. Bonneville is proceeding with the BP-22 and TC-22 proceedings in Phase IV. Bonneville looks forward to future stakeholder engagement in Phases IV and V.

This decision document concludes the Phase III decision-making process described in the EIM ROD. As noted above, Bonneville considers the decisions made in this document to be final decisions that will only be become ripe for challenge if Bonneville makes a final decision to join the EIM in phase V of the decision process.

Issued at Portland, Oregon, this 30<sup>th</sup> day of October, 2020.

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Bonneville Power Administration