

Submitted by	Company	Date Submitted
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The Bonneville Power Administration (BPA) appreciates the opportunity to comment on the California ISO's regional integration and EIM greenhouse gas compliance initiative and December 4, 2017 workshop. BPA supports the accurate accounting of greenhouse gases (GHG) and continues to support the CAISO's development of a two-pass solution to more accurately determine the GHG attribution for EIM transfers to serve ISO load. Both the implementation of a hurdle rate or long-term use of the California Air Resource Board's bridge solution do not provide accurate or equitable attribution of GHG compliance costs. BPA appreciates the complexities around resolving GHG accounting issues in the EIM cost optimization algorithm and supports continued discussion with stakeholders around whether further refinements of the two-pass solution are necessary and prudent.

Feel free to contact me if you have questions regarding BPA's comments.