

Resource Sufficiency Evaluation Enhancements Phase 3

Failure Consequences: Principles and Proposals

Bonnie Blair Counsel for the Six Cities

Western EIM Regional Issues Forum February 8, 2023

Near-Term Activities Should Include:

01

Analysis

Identify any inconsistencies between the WEIM RSE as modified by the Phase 2 enhancements and the EDAM RSE

02

Stakeholder Engagement

Build consensus on (a) purposes and objectives of RSE tests and (b) guiding principles for RSE formulation and evaluation 03

Review

On-going monitoring and analysis of failures



Defer Broad-Based Reform 1-2 Years Post-EDAM Implementation:

- Time to gain experience with a new method for calculating load uncertainty
- Time to gain experience with impact of Phase 2 enhancements
- Time to gain experience with RSE performance under EDAM



In-Market Consequences Are Not Appropriate <u>At This Time</u>:

There appear to be potential errors in identification of failures. In-market consequences do not allow for analysis of failures or identification of errors prior to impact of consequences.

Lack of consistency/
standardization in resource
counting (e.g., demand
response programs) could
lead to inequitable and/or
inefficient imposition of inmarket consequences.



Bonnie Blair

bblair@thompsoncoburn.com

202-585-6905

