



*Energizing Life in Our Communities*

September 9, 2020

Submitted electronically at [techforum@bpa.gov](mailto:techforum@bpa.gov)

Bonneville Power Administration  
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**Subject: Comments of Public Utility District No. 1 of Snohomish County on  
Power and Transmission Risk**

Public Utility District No. 1 of Snohomish County (Snohomish) appreciates the opportunity to comment on Power and Transmission Risk issues discussed in the TC-22/BP-22/EIM Phase III Customer Workshop held on August 26, 2020.

**Power and Transmission Risk**

*Issue 1: Trigger Metric for Risk Mechanism*

Snohomish supports BPA Staff Proposal of using actual Reserves for Risk as the trigger metric for CRAC, FRP Surcharge and RDC in the BP-22 Initial Proposal. This methodology is an improvement from the prior practice of using Accumulated Calibrated Net Revenue.

*Issue 2: Business Line vs. Agency TPP*

Snohomish suggests that BPA show the pros and cons of the proposal as compared to the status quo. Additional information/detail would make it easier for customers to evaluate the merits of the proposal.

Snohomish offers additional comments on Power Rates and Section 7(f):

*Electricity Market Price Forecast*

Snohomish would like to receive the Initial Proposal Aurora archive as reference in our own analysis of BPA rate impacts. As required on slide 129, Snohomish has an active Aurora license. We would also benefit from additional discussion on the elimination of carbon

adders on the Southern Intertie and details of the WECC load forecast used in the Initial Proposal.

*Section 7(f) Power Rate to Serve New Large Single Loads*

Snohomish appreciates the Agency's responsiveness to customer requests and commends the Agency for the time and effort exerted to exploring this issue. Snohomish encourages Bonneville to revisit this conceptual proposal (framework) on a rate period basis so as to address customer's future needs and leverage on the amount of work that's already been done.