

November 7, 2019

SUBMITTED VIA EMAIL TO [TECHFORUM@BPA.GOV](mailto:TECHFORUM@BPA.GOV)

Dear BPA Team;

Seattle City Light is a member of the Public Power Council (PPC) and supports the themes in PPC's comments regarding BPA's October 23 presentation of the TC-22, BP-22, and EIM Phase III timeline, issues, and workshops. As City Light has moved through its EIM Implementation, BPA has been a collegial and collaborative partner. We are confident that this spirit will extend through their own implementation.

City Light is one of many BPA customers noting that the agency faces an increased number, along with a greater complexity, of topics in BP-22 and TC-22 as compared to recent rate processes – largely driven by EIM Phase III. City Light recommends that BPA factor in this practical concern in setting timelines for consideration of issues and development of alternatives. We appreciate that BPA has acknowledged this and expressed intent to take it under consideration.

City Light looks forward to BP-22 and TC-22 being transparent, data-driven processes that are well-coordinated on overlapping topics. These processes may result in additional information becoming available, which is often constructive in developing solutions.

As always, we look forward to working closely and collaboratively with BPA staff on these proceedings.

Sincerely,

Emeka Anyanwu  
Officer, Energy Innovation and Resources Division  
Seattle City Light

