

**BP-26 Rate Case & TC-26 Tariff Proceeding Workshops  
Summary of Written Comments Received and BPA Staff's Responses**

**Last Updated: April 19, 2024**

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**I. Comments Received in Response to the March 19, 2024 BP/TC-26 Kick-off Workshop**

Row #	Stakeholder	Comment	BPA Staff Response
1	Harney Electric Cooperative	<p><b>Transmission Rates</b> - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>The Short-Distance discount (SDD) which adjusts an NT customer's Network Load calculation if it has a designated Network Resource that uses less than 75 circuit miles for delivery to the load. We wish to explore decreasing the credit limit (currently set at 40%). This discount is currently described in BPA's Transmission General Rate Schedule Provisions, but does impact the definition of Network Load.</p>	<p>The current Short-Distance Discount for the NT is set to a maximum of 60%, which BPA believes properly incents customers' behavior and reflects the value gained from locating Points of Delivery near Points of Receipt. BPA staff does not plan to propose any changes to this formula as it incents the correct customer behavior. If customers would like to present a proposal with reasons how it will maintain the customer behavior staff is seeking, staff is open to listen at a customer led workshop.</p>
2	Harney Electric Cooperative	<p><b>Transmission Rates</b> - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>Acknowledgement that, if a customer can demonstrate that investments in net load and/or automatic/instantaneous load shedding have been made that operationally limit (with virtual certainty) transmission service, then such operational limit is used as the billing determinant for NT charges. This encourages smart-grid investment and ensures that transmission customers are not charged for "stand-by" transmission service they cannot/will not utilize. This acknowledgement could be in the form of a simple written interpretation to NT customers, or language added to BPA's Transmission General Rate Schedule Provisions, i.e., Network Integration Rate, Section IV, Adjustments, Charges, and other Rate Provisions.</p>	<p>Thank you for your comment. BPA staff encourages Harney Electric Cooperative to submit a request to present this topic and any proposal at a customer-led workshop.</p>

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3	Harney Electric Cooperative	<p><b>Power Rates</b> - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>Clarifying where necessary that the wording “connected to Harney Electric Cooperative’s distribution system” within the definition of “Consumer-owned Resource” in HEC’s Regional Dialogue Power Sales Agreement includes all of HEC’s distribution system regardless of the voltage level at the point of such connection to HEC’s distribution system.</p>	<p>Thank you for your comment. Harney requested Bonneville to include a workshop topic to clarify the definition of “Consumer-Owned Resource” from the Regional Dialogue Power Sales Contract. Regional Dialogue contract language explanations are not a rate case topic and are outside of the scope of the BP-26 rate case proceeding. Bonneville encourages Harney to work with their Power Account Executive regarding questions about its Regional Dialogue contract. To the extent Harney would like to discuss changes to contract language for Post-2028, Bonneville encourages Harney to provide feedback through the Provider of Choice Policy Implementation and Contract Development phases workshops that began April 2024.</p>
4	NLSL Group	<p>As mentioned by BPA during the workshop, an NR service election has been made by a BPA customer to serve an NLSL. The NLSL Group agrees that quite a bit of education will be required to fully understand the intent and the proposed methodology of the NR Rate. BPA has stated that it plans to discuss NLSL issues at the July 30th and 31st workshops, but the NLSL Group believes that at least one follow-up workshop will be required to fully explore the intent and methodology of the proposed NR rate design and to respond to staff as well as customer questions.</p>	<p>We agree that the NR issues will likely require more than a single workshop to allow for sufficient time to understand, consider and respond. As such, we will commit to having at least two workshops that include NR-related issues prior to the release of the Initial Proposal.</p>
5	NLSL Group	<p>Most existing NLSL load is met with bilateral market purchases that are shaped to the actual metered NLSL loads using BPA’s Energy Shaping Service (ESS). In order to avoid UAI penalties, customers significantly overschedule HLH energy deliveries and must either assume plant outage risk or place significant cost risk on suppliers through non-standard liquidated damages provisions that adversely affect market liquidity. The NLSL Group is interested in exploring alternative methods for avoiding UAI penalties that will more accurately reflect costs incurred by BPA, result in more accurate scheduling practices, and result in equitable outcomes when suppliers have unplanned contingencies.</p>	<p>We intend to spend some of the NR-related workshop time on ESS and welcome customer proposed improvement suggestions for staff to consider. One of BPA staff’s main concerns with ESS is that the capacity obligations and cost of meeting those obligations are clearly defined and equitably allocated. There are often many right ways to achieve this stated result. As such, the NLSL load customers should consider presenting at a customer-led workshop to go over potential alternative approaches. BPA would be particularly interested in understanding how such approaches do, or do not, meet the capacity obligations of following NR load.</p>

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6	NLSL Group	The NLSL Group would like to explore the NR Resource Flattening Service (NRFS), which has been included in BPA’s General Rate Schedule Provisions as a way to use specified resources that could be shaped by the federal system in order to serve NLSL loads. After conversations with BPA, it is the NLSL Group’s understanding that BPA may or may not choose to offer this product in the future. The NLSL Group would like this service option to be discussed as part of the NLSL topic.	We will add this to the list of items to cover during our NR-related workshops.
7	NLSL Group	NLSLs generally have on-site generation and many are exploring modernizing this generating supply with resources that can be used for purposes other than back-up generation (for example, these generating resources could be dispatched to displace other generating resources or committed to provide reliability capacity). It is the NLSL Groups’ understanding that a customer must pay NT service for the gross amount of load irrespective of whether there is on-site generation that is operationally netted against the gross NLSL load. As part of TC-26, the NLSL Group would like to discuss what would be necessary for the customer to demonstrate to BPA that the on-site generation is reducing the NLSL load thus justifying a reduction to the NT service billing determinant.	BPA staff is reviewing this comment and will provide a response by the May BP/TC-26 workshop.
8	NRU	<b>Workshop Process</b> - NRU continues to support BPA’s six step approach to customer engagement and believes it has served both BPA and its stakeholders well in past processes.	Thank you for your comment.
9	NRU	<b>Rate Principles</b> - Regarding the proposed Principles, of primary importance to NRU members is BPA’s ability to offer an affordable and reliable power supply that maximizes the value of the Federal system for the benefit of preference customers. Given the available information, BPA’s proposed BP-26 Principles appear to be aligned with that end goal.	Thank you for your comment.

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10	NRU	<b>Tariff Principles</b> - NRU appreciates that the proposed TC-26 Principles highlight the fact that BPA will consider differences from the FERC pro forma tariff if the difference is necessary to prevent significant harm or provide significant benefit to BPA's mission or the region, including BPA's customers and stakeholders. As BPA and its customers continue to work through the queue reform process that began with TC-25 and given the necessity of long-term firm NT access to NRU members, BPA's willingness to deviate from the pro forma tariff may be essential as we move toward day-ahead market integration and Provider of Choice contract implementation.	Thank you for your comment.
11	NRU	<b>Power Rates</b> - Supportive of the Power Rates Topics that BPA proposed and asks that Tier 2 Pricing and Demand Pricing be added to the list, with time set aside for discussion and consideration.	BPA will plan to discuss Tier 2 and Demand rate pricing at the July 30-31 BP/TC-26 pre-proceeding workshop.
12	Seattle City Light	<b>Workshop Process</b> - Suggests that the approach to complete steps 1-6 in a single workshop provides a limited amount of customer engagement and question time within scheduled meeting time, and does not leave adequate time for step 5, "Discussion of Customer Feedback" prior to the step 6 staff proposal. One option City Light recommends BPA consider is to provide customers with key questions and issues for feedback two weeks prior to the BPA workshop where the topics will be covered. BPA could provide these through a Tech Forum email and request that customers respond within one week. Alternatively, BPA could provide the meeting materials a full two weeks prior to the BPA workshop. Customers could provide feedback in the same one-week time frame to allow BPA staff time to consider and incorporate customer perspectives.	Thank you for your comment. As suggested, we will endeavor to include specific questions for each topic to help focus customers' responses; however, this does not mean customers cannot provide comments on the topic other than responding to the specific questions.
13	Seattle City Light	<b>Rate and Tariff Principles and Workshop Process</b> - Supports the BP-26 and TC-26 Principles and grouping in person workshop meetings on successive days to reduce travel to and from workshops.	Thank you for your comment.