

January 3, 2022

Submitted via email to [techforum@bpa.gov](mailto:techforum@bpa.gov)

Northwest Requirements Utilities (NRU) submits these comments following the December 8 Concurrent Loss Return Service Customer Workshop. NRU represents the interests of 56 Load-Following customers located in 7 states across the region that hold Network Integration Transmission Service (NT) contracts with the Bonneville Power Administration (BPA).

NRU and its members appreciate the recent workshop, as agreed to in the BP-22 Rate Case Settlement, which provided an opportunity to review the implementation plan for the development of a concurrent in-kind loss return policy to replace the current option for a delayed in-kind loss return service. We further appreciate the schedule allowing for additional workshops on this proposal to understand the ramifications to differently situated utilities.

NRU has several questions it would like to share regarding the proposal and the two tagging options under consideration, where customers either schedule loss returns on the same tag or on a separate aggregated tag.

- Are there different implications associated with the proposals for differently situated utilities? Load-Following customers of BPA have transmission losses included as part of their bundled power products. Additionally for Load-Following customers, the proposed policy change will solely impact any non-federal portion of a Load-Following customer's power delivery. NRU requests further discussion to understand whether there are any additional implications for differently situated utilities that should be understood by stakeholders.
- Would the two different tagging approaches have different regulatory implications under the Washington Climate Commitment Act trading program that will go into effect January 1, 2023?
- Because the separate e-tagging proposal would tag the transmission loss as unspecified (and therefore likely be recorded as a transaction with emissions associated with it), what level of impact will the proposal have on the Asset Controlling Supplier rate that reflects the systems emissions factor of the Bonneville system?
- What are the barriers to reflecting kilowatt remainders and how will BPA ensure a customer's losses are not under- or over-measured on a cumulative basis?

Thank you for considering these questions. We appreciate the opportunity to learn more about the implications of this project.

Signed,

*/s/ Tashiana Wangler*

Tashiana Wangler  
Rates and Policies Director

*/s/ Enoch Dahl*

Enoch Dahl  
Resources and Planning Director