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To: [Tech Forum](#)
Cc: [Miller, Andrew J \(BPA\) - PSE-6](#); [Taylor, Eric K \(TFE\)\(BPA\) - TSE-TPP-2](#); [Hugh Broadhurst](#)
Subject: [EXTERNAL] Comments on BP-26 Rate Case and TC-26 Tariff pre-Proceedings
Date: Friday, March 29, 2024 8:54:50 AM
Attachments: [Outlook-uhztojyd](#)

Greeting:

Thank you for seeking feedback on the March 19, 2024 Kickoff to the BP-26 Rate Case and TC-26 Tariff pre-Proceeding. Harney Electric Cooperative (HEC) requests that the below topics be included in the workshops, led by either BPA staff or customer led. Given the nature of these topics, they may be better suited for the rate case or the Tariff pre-proceeding, and HEC is willing to discuss our concerns and recommendations in either or both fora.

1. 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.
2. 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.
3. 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.

Again, thank you for being interested in topics that are important to your customers.

Sincerely,

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