

August 30, 2019

Via Email (techforum@bpa.gov)

Bonneville Power Administration
Transmission Services

Re: De Minimis Impact Dead-Band for Flowgates - Shell Energy North America Comments

Shell Energy appreciates the opportunity to comment on the De Minimis Impact Dead-Band issue discussed during Bonneville's TC-20 Settlement implementation workshop on August 6, 2019.

Shell Energy believes there are number of customers concerned about unexpected impacts, arising from inconsistent application of the De Minimis Dead-Band methodology to warrant BPA's attention. Shell Energy respectfully requests BPA engage with customers to find a reasonable solution.

It is believed that including a de minimis test is appropriate for long-term and short-term point to point transmission both on original requests and redirects based on the net impact of the parent less the child.

Thank you,

Chuck Goligoski
Shell Energy North America