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Shell Energy North America (US), L.P. (“Shell Energy”) appreciates the opportunity to submit comments to the *Techforum* regarding BPA’s proposed 1:1 path curtailment business practice changes.

Shell Energy supports retaining the status quo or adopting alternative four which would allow curtailments to continue being assessed using both TSR limits and implemented e-tags. Shell Energy is concerned with proposals to conduct pro-rata curtailments based solely upon e-tags without reference to customers’ underlying transmission reservations/rights will create unintended consequences. Under alternatives 1, 2 and 3 customers who elect to reduce e-tags to their TSR’s corresponding “reliability limit” run the risk of being curtailed in excess of their reliability limit. Without reference to customers’ underlying TSR, customers may be disincentivized from voluntarily reducing e-tags in accordance with corresponding scheduling limits—which would require curtailment for BPA operators.

Should BPA elect to move forward with alternative 1, 2 or 3 proactive reductions of customer e-tags on affected 1:1 paths should be accounted for when calculating pro-rata e-tag curtailments.

Respectfully submitted,

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