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**Subject: TransAlta Comments – Redispatch & Curtailment on 1:1 Paths**

Matt:

TransAlta appreciates the opportunity to comment on BPA's curtailment proposals for 1-1 paths presented<sup>1</sup> on January 18, 2023 and the background that the presentation provided regarding this issue's history.

From that history, TransAlta observes that the changes BPA has presented for the Redispatch and Curtailment Business Practice (the four alternatives) exceed those in Category A, which is how this issue began in April 2022. According to Bonneville's Business Practice Process, Category A changes encompass things like grammatical errors and/or revisions with minor significance.

TransAlta suggests that making changes to how 1-1 path schedules are curtailed, or transitioning to one internal iCRS curtailment tool, or crafting a solution from multiple alternatives are material changes, like those covered in Category B, and we recommend treating this issue accordingly, perhaps by convening another Tech Forum event to discuss drivers for these proposed significant changes.

This is unclear because the existing (status quo) curtailment process for 1-1 paths appears to be non-discriminatory, it is enacted on scheduled capacity, and it steers clear curtailing based on reserved capacity alone, which FERC has rejected. TransAlta believes the status quo first creates a level playing field among transmission customers by accounting for actual Transmission Service Request ("TSR") rights. Second, and this part is not entirely clear, it includes a mechanism for returning capacity that is curtailed beyond the required reduction, which seems superior to the alternatives. Third, pro rata curtailment is enacted on *scheduled* volume that remains.

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<sup>1</sup> <https://www.bpa.gov/-/media/Aep/transmission/nt-service/rand-cbp-1-1path-customer-meeting.pdf>

TransAlta requests that BPA retain current practices and make no change to the Redispatch and Curtailment BP. Otherwise, altering the business practice similar to the alternatives presented should not be considered without further engagement commensurate with a Category B changes.

**TRANSALTA ENERGY MARKETING (US) INC.**

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