



Seattle City Light

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BONNEVILLE POWER ADMINISTRATION
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Submitted via email: post-2028@bpa.gov

Comments on October 14, 2026 Revised 5(b)9(c) Policy Workshop

Thank you for the opportunity to comment on BPA's 2027 Revised 5(b)9(c) Policy Workshop held October 14, 2026. As the region prepares for the start of the Provider of Choice contracts, City Light appreciates the opportunity to share our perspective on proposed policy revisions. Below, City Light provides our response to the proposed 5(b)9(c) issues and offers our feedback on additional topics.

Issue 1

Regarding the transfer and recall rights of a 5(b)1(A) resource, City Light recognizes 5(b)1(A) resources are preserved to serve in-region load. City Light supports the existing transfer language in the 5(b)9(c) Policy should the resource rights be applied to an existing or new purchasing customer. In the event the resource sale of a 5(b)1(A) resource is recalled back to the original owner, City Light would like to preserve the optionality to dedicate these rights or re-transfer these rights to a new purchasing customer. As such, language allowing for transfer to a new purchaser and/or recall is appropriate. City Light recognizes that Specified Resources should not be double counted and would like an option for temporary recall to allow for transition periods between existing and new customer purchasing agreements.

Issue 2

City Light would like to preserve the current optionality to declare incremental generation as a 5(b)1(B) resource as interpreted in Appendix A – 2003 Clarifications of the current 5(b)9(c) Policy. City Light does not support separate language addressing incremental generation in the 2027 Revised 5(b)9(c) Policy.

Issue 3

City Light does not support the inclusion of language addressing increased resource rights related to FERC relicensing agreements in the 2027 Revised 5(b)9(c) Policy. As the owner of large non-federal Specified Resources and a planned product customer, any increased resource rights or operational improvements related to new licensing agreements will not increase the energy burden on the Administrator. Anecdotally, City Light's recent relicensing efforts were focused on measures to improve fish passage, flood control operations, and habitat restoration. There are myriad operational measures within relicensing agreements that may increase or decrease resource rights and new policy language cannot cover all contingencies related to licensing implementation.

Additional Topic Areas for Consideration

City Light would like clarification on whether WRAP QCC calculation standards will be included in the 2027 Revised 5(b)9(c) Policy. As previously stated during the Standards for Resource Declaration comment period in April 2025, City Light would like the ability to update non-federal peaking capability values based on updated WRAP QCC calculation standards or an alternative, mutually accepted methodology should regional entities adopt different resource adequacy standards. The 5(b)9(c) Policy references the Pacific Northwest Coordination Agreement as a source of resource declaration values, with no mention of WRAP QCCs. The 5(b)9(c) Policy does not explain how to calculate missing WRAP QCC values nor clarify whether a customer will be able to update their Specified Resource declarations as the WRAP QCCs evolve over time.

City Light acknowledges the 2027 Revised 5(b)9(c) Policy will include redline updates that reflect new language as defined in the Public Rate Design Methodology and Provider of Choice contracts. For improved clarity, City Light would also appreciate a more comprehensive update to the 5(b)9(c) Policy while recognizing the current revision cycle is limited in scope. A more wholistic policy refresh that reflects modern market dynamics would be beneficial to the region as part of a future contract or policy update package.

Thank you for the opportunity to provide feedback on the proposed issues and overall scope. City Light staff look forward to attending the next series of workshops in November.

cc:

Kathryn Patton, Bonneville Power Administration