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TACOMA PUBLIC UTILITIES

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BONNEVILLE POWER ADMINISTRATION

Email: Post-2028@bpa.gov

Tacoma Power's Informal comments concerning BPA 5(b)9(c) Workshops

Tacoma Power's overall position:

If a 5(b)(1)(A) or 5(b)(1)(B) resource has an increase in its output capabilities during POC contract term, the utility owning the resource should be able to maintain the right, but not the obligation, to dedicate that increase in generation either as a "new resource" or as an "existing resource".

Issue #1

Position – Tacoma Power supports BPA's clarification

Resource rights transferred between customers should retain their existing dedication obligations to prevent double counting and unintended changes to BPA net requirements. Upon recall, dedication obligations should follow the resource rights back to the original owner.

Issue #2

Position – Tacoma Power opposes automatic dedication of increased output from resource improvements.

Tacoma Power recommends that BPA distinguish between maintaining existing resource capability and creating incremental capability through new investments. Increased output from resource improvements does not increase the energy burden on the Administrator. Automatically dedicating this additional output would disincentivize customers from investing in improvements that increase regional hydroelectric generation. Incremental capability should be treated as a new resource under 5(b)(1)(B), rather than an extension of the original dedication under 5(b)(1)(A). Customers should retain the discretion to determine whether to dedicate this additional generation to serve their firm retail load.

Issue #3

Position – Tacoma Power opposes automatic dedication of increased generation rights obtained through relicensing.

Increased generation rights obtained through relicensing does not increase the energy burden on the Administrator. Automatic dedication would effectively transfer the economic value of utility-funded investments to BPA through reduced power purchases,

without BPA contributing to those investments. Any incremental generation rights should be treated as new resources under 5(b)(1)(B), rather than an extension of the original dedication under 5(b)(1)(A). Customers should retain the discretion to determine whether to dedicate these additional rights to serve their firm retail load.

Cc: Kathryn Patton, BPA

/s/ Leslie Almond
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