

Comments of the Sacramento Municipal Utility District,
Transmission Agency of Northern California, and Turlock Irrigation District
BP-20 Rate Case Workshops
September 7, 2018

The Sacramento Municipal Utility District, Transmission Agency of Northern California, and Turlock Irrigation District (collectively, the Northern California Utilities or NCUs) appreciate the opportunity to provide the following comments regarding Bonneville Power Administration's (BPA) BP-20 workshops.

During the BP-18 rate proceeding, BPA staff pointed to the ability to analyze non-rate alternatives to the Southern Intertie Hourly Firm and Non-Firm rate increase adopted in that proceeding and intended to do this once the proceeding was complete. For example:

- Adopting our proposal does not preclude continued work and collaboration with customers and stakeholders to adopt non-rate solutions to address Southern Intertie seams issues. *See BP-18-E-BPA-25 at 39.*
- On July 6, 2016, we shared with the customers that BPA would defer work on non-rate solutions until after the BP-18 ROD was issued. *See SM-BPA-26-14.*

To date, BPA has not provided any follow-up information to stakeholders on this issue. The NCUs respectfully request that BPA provide any analysis on non-rate alternatives that has been conducted since the July 26, 2017 BP-18 Record of Decision (ROD).¹ If BPA has not conducted any analysis since BPA's ROD, we ask BPA to explain why and its plan for conducting such analysis going forward.

Thank you.

¹ BPA's Regional White Paper on Southern Intertie Hourly Non-Firm Alternatives (February 16, 2016) was conducted before the BP-18 rate proceeding and was not the basis for BPA's commitment to explore and analyze non-rate alternatives after the BP-18 rate proceeding.