

Comments of the Sacramento Municipal Utility District,  
Transmission Agency of Northern California, and Turlock Irrigation District  
BP-20 Rate Case Workshops  
May 4, 2018

The Sacramento Municipal Utility District, Transmission Agency of Northern California, and Turlock Irrigation District (collectively, Northern California Utilities or NCU) appreciate the opportunity to provide the following comments on BPA's proposed schedule for workshops in preparation for the formal BP-20 proceeding.

In general, NCU expects to participate in workshops related to NCU interests as buyers of energy from the Northwest delivered at the California-Oregon Border (COB). The prices that NCU members pay for such purchases are directly affected by BPA's approach to transmission rate design, as well as congestion management protocols on the Network that could affect the availability and price of surplus energy for export to California.

NCU expects to request one or more opportunities during the workshops this summer, to present analyses of rate design on the Southern Intertie, especially regarding the decision in BP-18 to increase the hourly southbound rate by 270 percent. We understand that BPA requires notice of such requests, in order to ensure that the workshop schedule can be adjusted and interested parties notified in advance. NCU will provide BPA with notice at least two weeks in advance of the requested workshop date and will help ensure that the workshop process leads to a productive exchange of information.

To help ensure efficiency of the workshop process, NCU also requests that BPA provide as much notice as possible of workshop topics, and that BPA post workshop materials no later than five (5) business days in advance of each workshop, to provide all parties an adequate opportunity to prepare.

Thank you.

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