



Your Community Energy Partner

September 7, 2018

Submitted via email to: techforum@bpa.gov

Rebecca Fredrickson
Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

**Re: Comments of Public Utility District No. 1 of Snohomish County on
BPA's BP-20 Process**

The Public Utility District No. 1 of Snohomish County (Snohomish) appreciates the opportunity to submit these comments regarding the Bonneville Power Administration's (BPA) BP-20 process. These comments focus on the development of rate schedules in advance of the BP-20 rate proceeding, and how that development may be affected by the parallel tariff development process.

BP-20 Rate Schedules and the TC-20 Tariff Process

Snohomish is seeking clarification from BPA regarding the rate schedules being developed as part of the BP-20 rate process. It is Snohomish's understanding that leading into the TC-20 process, BPA had planned to operate two transmission tariffs:

- The currently-in-effect tariff, which would govern those customers currently taking service from BPA (the "Existing Tariff"), and;
- The tariff established in the new TC-20 tariff development process, which would govern any new service acquired from BPA (the "New Tariff")

Because BPA had planned to operate two tariffs, it was Snohomish's expectation that BPA would maintain two sets of rate schedules - one for each tariff. However, Snohomish has not seen indications that BPA is developing updated rate schedules for use with the Existing Tariff.

For example, at the August 22 BP-20 Workshop, BPA staff presented redlines that compared the currently effective rate schedules associated with the Existing Tariff to the rate schedules BPA staff intends to propose for the New Tariff. In particular, the redlined rate schedules removed references to hourly firm service consistent with BPA staff's intent to not include the hourly firm product in the New Tariff.

However, BPA staff did not provide a comparison between the currently effective rate schedules and rate schedules BPA staff intends to propose in the BP-20 proceeding that would be associated with the Existing Tariff. It is Snohomish's understanding that the Hourly Firm product would continue to operate under BPA's Existing Tariff for those customers with applicable service agreements, and that the associated rates would be updated and published in the rate schedules for the Existing Tariff.

BPA has traditionally shared with customers its proposed changes to rate schedules prior to the commencement of a proceeding to allow customers an opportunity to review and comment before BPA staff makes a final decision on how to move forward. Snohomish is concerned that without the chance to review rate schedules developed for the Existing Tariff, customers' ability to provide substantive feedback would be impaired.

Snohomish understands that BPA and its customers are planning to engage in settlement discussions, which may result in all customers moving to a single tariff under a settlement agreement. However, given the relative uncertainty around settlement discussions, Snohomish encourages BPA to fully develop rate schedules associated with both the Existing Tariff and the New Tariff for consideration prior to the start of the BP-20 rate proceeding. Snohomish also encourages BPA to share those rate schedules with its customers at BPA's earliest opportunity.

Snohomish appreciates the opportunity to provide these comments. If BPA has any questions about this issue, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ian Hunter".

Ian Hunter
Transmission Policy Analyst
(425) 783-8309
irhunter@snopud.com