

April 17, 2020

**Via email:**

[techforum@bpa.gov](mailto:techforum@bpa.gov)

U.S. Department of Energy  
Bonneville Power Administration  
Transmission Services

**Re: Comments of Avista Corporation, Portland General Electric Company, and Puget Sound Energy, Inc. on BPA Alternative Strategy for BP/EIM/TC Process**

Avista Corporation, Portland General Electric Company, and Puget Sound Energy, Inc. submit the following comments on the BPA Alternative BP/EIM/TC Strategy (“Alternative Strategy”) and the April 8, 2020 BPA Tech Forum email regarding “Virtual Meeting Announcement: Discussion of Potential Process and Engagement Changes to TC-22, BP-22 and EIM Phase III Workshops.”<sup>1</sup> In the April 8 Tech Forum email, BPA requested feedback on whether BPA should adopt the Alternative Strategy “or stay the course.”

Avista Corporation, Portland General Electric Company, and Puget Sound Energy, Inc. recognize that present circumstances are challenging for BPA and its stakeholders and are causing BPA to evaluate, and seek input on, strategies for the BP/EIM /TC process. BPA’s request for feedback on its process is appreciated.

Important elements in any BPA process must include the following: (i) opportunity for timely stakeholder input, (ii) BPA consideration, and discussion with stakeholders, of that input in developing BPA proposals, (iii) use of analyses, such as analyses BPA has undertaken, in developing BPA proposals. Regardless of whether BPA adopts the Alternative Strategy or stays the course, inclusion of these elements in BPA’s process should facilitate collaboration, incorporation of stakeholder feedback into BPA proposals, and regional consensus.

BPA has received a number of comments to date on TC-22, BP-22 and EIM Phase III workshop topics<sup>2</sup> and on TC-20 implementation topics.<sup>3</sup> BPA’s process should ensure consideration of these comments and allow for timely submittal of additional comments going forward. (For example, any straw proposal under the Alternative Strategy must be flexible and subject to adjustment based on stakeholder input and discussion.)

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<sup>1</sup> The BPA BP-TC-EIM Phase 3 Alternative Proposed Timeline is available at <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/10Apr20%20-%20Alternative%20Proposed%20Timeline.pdf> (“Alternative Strategy Timeline”).

<sup>2</sup> See, e.g., <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Pages/Customer-Comments.aspx> .

<sup>3</sup> See, e.g., <https://www.bpa.gov/transmission/CustomerInvolvement/TC20Implementation/Pages/Customer-Comments.aspx> .

BPA analyses, including transparency for stakeholders regarding such analyses, of various issues-- such as analyses and transparency pursuant to the TC-20 Settlement Agreement<sup>4</sup>--should proceed.<sup>5</sup> Such analyses and transparency should provide an important foundation for the BP/EIM/TC processes, and timely access to such analyses and transparency should facilitate understanding of the issues and help promote consensus on them.

BPA's review of these comments and consideration of the recommendations contained herein is appreciated. By return e-mail, please confirm BPA's receipt of these comments.<sup>6</sup>

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<sup>4</sup> Available at [https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/TC-20%20Settlement/Final\\_TC-20%20Settlement%20Agreement%20\(11-13-08\).pdf](https://www.bpa.gov/Finance/RateCases/BP-20/Meetings/TC-20%20Settlement/Final_TC-20%20Settlement%20Agreement%20(11-13-08).pdf).

<sup>5</sup> Several of these analyses are described in the Comments of Avangrid Renewables, LLC, Avista Corporation, Portland General Electric Company, and Puget Sound Energy, Inc. on March 17, 2020 TC-22, BP-22 and EIM Phase III Customer Workshop on (1) Seller's Choice, (2) Transmission Losses, (3) Type of Transmission for EIM Transfers, (4) Intertie Studies, and (5) Proposed ST ATC Improvement #3 - Hourly NF AFC, Pilot Program. Available at [https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/Comments/Mar%2017%20Workshop/03.31.20%20Commenting%20Parties%20\(Avangrid-PGE-Avista-Puget\).pdf](https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/Comments/Mar%2017%20Workshop/03.31.20%20Commenting%20Parties%20(Avangrid-PGE-Avista-Puget).pdf).

<sup>6</sup> Nothing contained in these Comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or provided under BPA's Tariff or otherwise under contract.