



November 13, 2020

TO: BPA Tech Forum (*submitted to techforum@bpa.gov*)
RE: BP-22 Transmission Loss Settlement

Dear BPA,

Idaho Falls Power does not support the current proposal/settlement in how losses are dealt with. We are struggling to understand the concept of capacity costs as it pertains to physical energy loss settlement coupled with the fact that 168-hour physical settlement doesn't simply net out in the long run for both parties. The deviation from standard loss settlement practices, creating and new capacity cost/charge coupled with also not allow concurrent loss payback is something that needs a more robust process and understanding by affected parties.

I encourage BPA to not proceed forward with the proposal so we can better understand the cost drivers and cost causation principles so we can find a more collaborative solution that doesn't create undue work for entities paying back their losses.

Respectfully,

Bear Prairie

A handwritten signature in blue ink that reads "Bear Prairie".

General Manager

cc. File/BP448