

August 23rd, 2024

BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on August 9th BP-26 Workshop

Seattle City Light (City Light) appreciates BPA's efforts to actively engage, facilitate Customer-led workshops, and be responsive to customers regarding BP-26 Rate Case and TC-26 Workshop topics. City Light would like to offer the following comments for BPA's consideration.

Energy Shaping Services (ESS)

City Light supports BPA recovering the full cost of load uncertainty using cost causation principles. City Light suggests that BPA explore ESS charges that fully recover the costs for load uncertainty, including uncertainty for extreme weather conditions.

Power Unauthorized Increase

City Light supports BPA staff Alternative 3 that reflects hourly market energy cost conditions and monthly capacity demand rate conditions. City Light additionally supports the proposed UAI Waiver Language.

Demand Rate

City Light supports the concept that the Demand Rate should be a long run price signal that incentivizes energy and resource decisions. City Light also supports limiting rate shock impacts to customers. In this context, City Light suggests that BPA ramp in a substantial amount of the 23% increase in the Demand Rate yearly over the rate period. This could occur with a 7% increase applied in each of the three years of the rate period.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light