



Seattle City Light

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BONNEVILLE POWER ADMINISTRATION
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments concerning BPA August 31st BP-26 Settlement Workshop

Seattle City Light (City Light) appreciates the opportunity to provide comments on Bonneville Power Administration's (BPA) August 31st BP-26 Settlement Workshop.

Settlement Commitments General Comment

City Light suggests that BPA consider the customer expectation that a settlement commitment to hold a workshop on a topic is not met by holding one short workshop to meet three commitments.

Behind-the-Meter (BTM)Feedback

BPA states on slide 22 of the presentation that it has a planning obligation for all load behind a NITS Point of Delivery. City Light seeks clarity on how BPA would treat behind the meter NITS load if the NITS customer were in a separate Balancing Authority Area (BAA). City Light asserts that reliability and planning concerns are negated if the NITS customer were within its own BAA. The BAA, not BPA, would be responsible for rebalancing its system if a BTM resource were to fail. There would be no impact on the reliability of BPA's Network. City Light requests that BPA provide clarity and develop a policy for NITS BTM that is within a customer's BAA and therefore not the responsibility for BPA to include in planning or reserve resources to maintain.

City Light thanks BPA for accepting and considering these comments.

Michael Watkins
Strategic Advisor
Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration