Thanks for the opportunity to comment. As a PTP load serving customer in BPA’s Balancing Authority (BA), Grays Harbor PUD relies on the firm hourly PTP product to both serve our load and for short term market purchases and sells of our surplus power to the market. Grays Harbor PUD supports any alternatives that offer firm hourly product in BPA’s BA or ability to shape firm PTP transmission hourly in the following order of preference:

1. Unlimited hourly firm
2. Limit hourly firm
3. Shaped daily firm product, assuming it would allow a single hour redirect or a purchase based on ATC for a specific hour to be used

We expect that elimination or limiting of the hourly firm product will result in increased curtailments to load due to increased scheduling on non-firm hourly PTP transmission.

We also propose BPAT offering a switch from PTP to NT service if hourly firm product becomes limited or no longer offered.

Sincerely,

Melinda James-Saffron
PUD #1 of Grays Harbor County
Power and Energy Services Director

Grays Harbor PUD