

Seattle City Light (City Light) submits these comments in response to the March 17, 2020 TC-22, BP-22 and EIM Phase III Workshop.

Transmission Losses:

City Light strongly supports PPC's comments on this issue. At this time, the potential benefits of alternatives to the status quo remain unclear and do not appear to outweigh the costs and impacts that customers will bear as an outcome of any changes. Notably, BPA includes "Customer Impact" among its criteria for the decision on losses, however, there has not been adequate discussion and analysis on this area. City Light encourages BPA to carefully assess the impact that any change to its treatment of losses will have on customers. We look forward to seeing additional evaluation and engaging in further discussion about the customer experience.

EIM Transmission Usage on the Network:

City Light supports an Interchange Rights Holder transmission donation model in which both firm and non-firm PTP products would be eligible for donation. We understand that there are some concerns with the inclusion of unlimited hourly non-firm, and that BPA may need to limit the non-firm product to those limited by ATC.

Non-firm transmission is utilized regularly in the EIM, as EIM entities using the ATC methodology provide as-available transmission across their systems on a non-firm basis. With that in mind, there should be limited barriers to allowing EIM transfers to flow on non-firm transmission when such transmission capacity is available. Moreover, the recent Business Practice revision allowing for dynamic transfers on non-firm transmission provides an indication that this type of flow on non-firm transmission is feasible on BPA's transmission system.

Hourly Firm:

City Light appreciates the update on the hourly firm evaluation. As mentioned in our comments on this topic submitted to Tech Forum on March 2, Hourly Firm remains an important product to City Light for use in balancing our loads and resources as well as for providing reserves.

At a high level, as we look forward to the June 24 update on this topic, it would be useful to hear from BPA about what it has been able to discern from the data collected to date. For example, what were the objectives of this change in policy, and is the system responding as anticipated? Can BPA parse any changes to ATC? Additionally, it would be useful to hear how BPA is integrating the feedback it has solicited from customers as a part of this analysis. The Hourly Firm Monitoring and Evaluation Plan states that "Bonneville will consider this customer experience information during the evaluation of the hourly firm product" and BPA has solicited feedback in advance of this workshop and others, but, to date, this information has not been integrated into the analysis presented to customers.

More specific to the March 17 presentation, we have additional questions about some of the information provided in the Deep Dive on the February 2020 North of Echo Lake slides. Specifically, we are interested in better understanding the schedules and what type of reservations the schedules were depending upon when the peak flows occurred. For example,

on slide 83 and 85, it would be useful to have some more granular data about what occurred when actual flows exceeded TTC on February 17 between HE6 and HE 12 (slide 83) and February 23, from HE 7 to HE 14 (slide 85), including:

- a. total of net schedules;
- b. the reservation types associated with the total non-netted schedules.
- c. Breakout reservations N>S
- d. Breakout reservations S>N

De Minimis:

Like hourly firm, the short term *de minimis* issue is important to City Light, and both impact City Light's ability to balance loads and resources in the near-term horizon. As we have indicated in multiple forums, changes to a number of BPA's policies and practices over the past eight months have greatly reduced customers' ability to redeploy long-term firm transmission service in the short-term horizon. The lack of clarity and inconsistent documentation associated with the application of the *de minimis* test for short term redirects have exacerbated the challenging impacts of these changes. Moreover, in the case of the *de minimis* test, we are concerned that the current application does not apply the same standards across all products.

City Light understands that BPA has competing priorities that it has to balance as it allocates staff and resources to address policy as well as operational issues. In the meantime, customers are left in a challenging situation. The sooner that BPA can address these issues and provide clarity, the sooner it can provide relief to customers.

ST ATC:

Before BPA implements the proposed change to eliminate using negative ETC as part of its base ETC data (Proposed ST ATC Improvement #1), City Light believes it would be helpful if BPA provided a historical analysis by month for the past 5 years of (a) the number of reservations, (b) the MWhs, and (c) the peak MW amount that were granted because negative ETC was the practice. In other words, how frequently and by how much did the total granted reservations exceed ATC over the past 5 years?

Additionally, in the discussion about Proposed ST ATC Improvement #3, BPA indicated it is considering a pilot program to limit hourly non-firm sales to the posted hourly non-firm ATC in OASIS. City Light requests that BPA provide any additional information it might have to offer on its early thinking on this pilot.