

January 31, 2025

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments Concerning Requesting Transmission Service BP v48

TSR Deposit and Non-Refundable Processing Fee

Seattle City Light (SCL) supports BPA recovering costs in accordance with cost causation principles. SCL suggests BPA consider if the proposed increase in the Non-Refundable Processing Fee recovers all costs associated with initial consideration of new TSRs.

Data Exhibit Submittal and Validation for LTF TSRs 5.a

SCL suggests that BPA consider providing customers with 10 business days from the receipt of BPA's notice to rectify deficiencies. Additionally, SCL requests BPA allow and support customers listing multiple parties for all notifications regarding new TSR request deficiencies. Allowing multiple notifications should alleviate business need for an extended period for customer response.

SCL recommends limiting the length of time for evaluating TSR Data Exhibits to 30 days if BPA cannot support a longer time frame for customer response.

SCL thanks BPA for accepting and considering these comments.

Michael Watkins
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Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration