







Seattle City Light

700 5th Ave. | P.O. Box 34023 | Seattle WA 98124-4023
TEL (206) 684-3000 TTY/TDD (206) 684-3225 FAX (206) 625-3709
seattle.gov/city-light    

July 15, 2025

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
PORTLAND OR 97293-4428

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

Bonneville Power Administration Conditional Firm Service Business Practice v30

Seattle City Light (City Light) appreciates the opportunity to comment on the proposed amendments to the Conditional Firm Service Business Practice.

City Light understands and is supportive of Bonneville's intent behind removing the termination rights for customers whose Bridge CFS is converted to Reassessment CFS, where the customer has not continued participating in the necessary upgrades. This appropriately links termination rights to upgrade participation.

City Light recommends BPA consider customers who have met all their participation requirements but have not been awarded firm service due to actions or inactions by BPA. In this case, we suggest customers should retain the option to terminate their agreement upon conversion to Reassessment CFS. City Light supports BPA advancing policies for shared accountability while following cost causation principles.

City Light additionally recommends that this business practice should be part of the suite of business practices amended as part of the Grid Access Transformation. City Light requests that BPA extend the proposed business practice process for CFS v30 to align with the proposed Grid Access Transformation business practice process.

City Light thanks BPA for accepting and considering these comments.

Michael Watkins
Strategic Advisor
Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration