



July 18, 2018

RE: TC-20 Comments – Hourly Firm

As a PTP load serving customer in BPA's Balancing Authority Area (BAA), Benton PUD relies on the firm hourly PTP product to serve our load from short term market purchases and to move our surplus power to the market.

Benton PUD supports any alternatives that offer a firm hourly product in the BPA BAA or the ability to shape firm PTP transmission hourly in the following order of preference:

1. Unlimited hourly firm (status quo)
2. Limited hourly firm
3. Shaped daily firm product, assuming it would allow a single hour redirect or a purchase based on available transfer capability (ATC) for a specific hour to be used

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

Benton PUD proposes that BPAT offer an opportunity to switch from PTP to NT service if the hourly firm product is eliminated or becomes limited.

Benton PUD appreciates BPA's consideration of these comments.

Submitted by:

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