



June 2, 2020

Re: NIPPC comments on BPA 5/19/20 Workshop

NIPPC appreciates the opportunity to provide comments to BPA on the Seller's Choice topic.

Some NIPPC members see value in BPA's continued support of Seller's Choice contracts.

This support, however, is tempered by ongoing concerns that the optionality inherent in a Seller's Choice contract has an outsized impact on Long Term and Short Term ATC. This concern is not necessarily based on the ATC impacts of Seller's Choice contracts at the current level, but is also based on a potential future where there is a significant increase in the demand for Seller's Choice contracts.

Over the past several rate periods, NIPPC has consistently urged BPA to implement re-dispatch of Network Customers' Designated Network Resources. Yet BPA has consistently refused to consider implementation of this core component of Network Service under the Open Access Transmission Tariff.

At this point in the process, NIPPC and its members continue to have insufficient information regarding BPA's implementation of the transmission service requirements associated with Seller's Choice contracts to make an informed decision on whether to oppose or support any alternative.

NIPPC encourages BPA to provide examples which walk through the steps of how transmission is reserved and scheduled, including when encumbered ATC for both Long Term and Short Term Seller's Choice contracts is claimed or released for broader use in the marketplace. At some point, it would also be useful for BPA to explain how each of the proposed Alternatives to BPA's Short Term *de minimis* test would be applied in its evaluation of the transmission requirements for a Seller's Choice contract.