

December 22, 2016

BONNEVILLE POWER ADMINISTRATION  
VIA E-MAIL

Dear Jeff King,

Seattle City Light ("City Light") thanks you for the opportunity to comment on the proposed Coordinated Transmission Agreement ("Agreement") between BPA and the California ISO ("CAISO"). City Light understands and appreciates that BPA and CAISO are formally memorializing certain current operations and data transfers between BPA and the CAISO as well as strengthening the relationship between the two entities into the future.

City Light encourages BPA to consider seams issues comprehensively, including the value of the Southern Intertie to those who support it financially. City Light encourages BPA to continue to support the value of the Southern Intertie and explore areas where its value could be enhanced, such as additional Dynamic Transfer Capacity.

City Light is concerned that a public process for standard operational coordination is unnecessary in this particular instance. The entities should use other stakeholder initiatives, e.g. BPA's Commercial Operations KSI and CAISO's business practice manual change process, to effectuate any changes associated with existing processes that impact how the parties coordinate outside of this Agreement.

City Light recognizes and encourages BPA's and CAISO's use of utility best practices relating to operational coordination of each of their respective systems. Though not a party to the agreement or a member of the Coordination Committee, BPA customers should have an avenue or opportunity to discuss and advocate impacts of this Agreement and its implementation on the customers' use of their transmission rights. City Light is concerned that the proposed agreement contains only minimal protections for customers if the impacts of this Agreement are not as anticipated. City Light requests that BPA provide some regular reports of progress or outcomes related to this Agreement in order to permit evaluation of the results of the Agreement. Furthermore, City Light requests that BPA publish the implementation cost estimates.

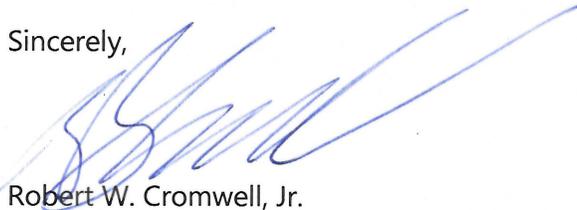
City Light encourages the parties to use all appropriate and cost effective means to maximize the benefits of coordination between the parties. City Light hopes that implementation of this agreement will help BPA modernize and provide the transmission business line an improved set of tools and capabilities, consistent with the goals of Commercial Operations KSI, which we support.

Section 5 has prescriptive language. City Light suggests BPA and CAISO consider more general language in which each agency agrees to follow its own practices, provide regular and appropriate

information to the other, comply with applicable standards of other entities (WECC, NERC, Peak, *etc.*) notify the other if information is not provided in a timely or otherwise appropriate manner, and similar affirmations of coordination. If the Agreement will continue with prescriptive language, City Light suggests reviewing § 5 to ensure that the language encourages mutual notification and that both parties respond in a timely manner when notifications are not provided or are incorrect.

City Light requests that BPA and CAISO carefully consider the business practices they will establish regarding curtailment of schedules. It will be important to assure that there is clear accountability for curtailments (or EIM redispatch) and that actions are made clear to all affected participants.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Cromwell, Jr.", written over a light blue horizontal line.

Robert W. Cromwell, Jr.  
Director  
Seattle City Light