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Subject: TEMUS Comments on Hourly Firm Evaluation and Total Transfer Capability

Matt:

During Bonneville's TC-20 Settlement Customer Workshop on September 26, 2019, staff provided an update and shared evaluation results of the Hourly Firm product based on the established Monitoring and Evaluation Plan. There was information about hours when actual flow on certain flowgates were within 20% of Total Transfer Capability ("TTC"), see slides 15 – 17 from the workshop's materials, and a conceptual method for measuring transmission risk called Firm Capacity Buffer ("FCB"), from slides 33 – 35.

TransAlta Energy Marketing (U.S.) Inc. ("TEMUS") is submitting written comments to request an opportunity to discuss and understand these TTC topics more fully. In particular, TEMUS would like to explore whether TTC observations from TC-20 Monitoring and Evaluation have informed, for example, current Seasonal TTC updates.

TEMUS is concerned because TTCs were covered in the October 16, 2019 Commercial Business Process Improvement ("CBPI") call, where agendas traditionally deal with OASIS performance, webTrans updates, and system automation projects. Yet apparently during the October 16th call, subject matter experts discussed how new TTC policy intends to better reflect uncertainty.

TEMUS requests a bigger venue to discuss these points: 1.) How TTCs better reflect uncertainty. TEMUS observes that uncertainty factors *always* result in reduced transmission availability, 2.) We want to understand what reliability role TTC policy plays when real-time flows are governed by System Operating Limits, and 3.) We want to explore whether results observed from TC-20 Monitoring and Evaluation have influenced recent changes.

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