

TECHFORUM

December 4, 2015

Seattle City Light's Comments re: BPA Questionnaire on Transmission Load Service and ATC

Dear Ms. Nichols-Kinas,

Seattle City Light (Seattle) appreciates the opportunity to provide comments and give input on BPA's Transmission Load Service Initiative and Revised ATC Methodology Questionnaire.

Our primary concern around changing the ATC methodology is balancing the preservation of our current level of service on existing Long-Term Firm reservations with Seattle's need to rely upon redirects for load service and commercial transactions.

Of the questions posed in the Questionnaire on Transmission Load Service and ATC, unfortunately Seattle can only be responsive to Question 8 which asks "What data would help you make a more informed selection to any or all of the above questions?" The questions posed on modeling assumptions presume that Seattle has the requisite information to determine the impacts of the various modelling assumptions and the accompanying trade-offs. In Seattle's view, such questions are premature.

To answer Question 8, Seattle requests that BPA runs a model, varying it by the listed assumptions, and reviewing the results of those runs with its transmission customers in a workshop. Understanding how different flowgates would be impacted under different modeling assumptions would put Seattle in a better position to be able to provide meaningful input in this process. During the workshop on November 17th, customers requested a matrix of the options/assumptions with costs and the results and implications of the varying assumptions. Seattle reiterates this request.

Additionally, BPA should begin systematically collecting the relevant data about transmission system use. This will enable more informed decisions in the future.

Seattle would also like to thank and commend the BPA staff affiliated with this initiative. Staff have been accommodating, responsive, and collegial to work with through the process thus far. As a customer, Seattle greatly appreciates these efforts. Should you have any questions about these comments, please don't hesitate to contact Sarah Davis at Sarah.Davis@Seattle.gov or 206-386-4537.

Sincerely,



Sarah Davis, Sr. Power Analyst
Seattle City Light