



March 15th, 2021

RE: TSR Study and Expansion Transmission Business Practice Proposed Changes

City Light thanks Bonneville Power Administration for the opportunity to provide feedback on proposed changes to business practices. City Light has the following comments regarding the proposed changes.

- Change: Clarification that choosing not to specify generation source may result in being ineligible for conditional firm service (B.2.h) *City Light recommends this change become effective after the current Cluster Study process has concluded and prior to the deadline for entities to elect to enter the next Cluster Study process.*
- Proposal to change the customer's response timeline for returning the preliminary engineering agreement from 30 days to 15 days (E.1.c) *City Light recommends the timeline for customer's response returning the preliminary engineering agreement remain 30 calendar days. The detailed analysis and due diligence needed by customers before committing significant resources to a preliminary engineering agreement make a 15 calendar-day time-period insufficient. Under the proposed change, an entity could receive a preliminary engineering agreement on Thursday May 27th, 2021 and must return the signed agreement with full payment before or on Friday June 11th, 2021. Considering 1 business day for wire payment, 3 business days for invoice processing and accounting, and entity must make the approval choice by the end of June 4th. With the holiday weekend and the possibility of key personnel taking vacation, this leaves an entity with on 4 business days to make a commitment to a 30-to-50-year asset. This is not a reasonable customer expectation by Bonneville.*
- Proposal to change credit security requirements to allow customers to request removal of required security for a plan of service when the TSR revenues have covered the cost of the upgrade (H.7.a.i.) *City Light supports this change. Allowing customers to request removal of required security for a plan of service when the TSR revenues from customers have covered the cost of the upgrade is fair and equitable.*

Sincerely,

Michael Watkins
Strategic Adviser
Seattle City Light
michael.watkins@seattle.gov

