

Seattle City Light comments on TSEP business practice changes, v4

City Light offers the following comments on BPA's proposed changes to the Transmission Service Request and Expansion Process (TSEP) business practice, version 4.

Transmission service is extremely important to City Light, and understanding BPA's information needs and processes will help us be good business partners. We are considering making a TSR request this year. We will also be renewing our service agreement in the future, and may want to make some changes then. We have not been in the queue for more than 5 years, and are reacquainting ourselves with BPA's requirements. To the extent that we understand the information that BPA requires, and what BPA will do with that information, we can make a complete request that should help both parties get to a plan of service.

Some of the TSEP BP changes, especially sections B.6 and D in v4, are tied to the conditional firm BP v 24, which was out for comments in March 2020. City Light and other commenters raised questions about some of the proposed changes, and requested additional consideration of the proposed changes to conditional firm. We request that BPA consider a pause to the changes related to conditional firm or put them in a separate BP update process so that the other proposed changes to TSEP may proceed.

Regarding the TSEP BP itself, City Light offers the following comments.

City Light requests that BPA add more description of the both the process and decision criteria BPA will use in the many decision points. For example, in A.2, "...BPA may perform Preliminary Engineering..." and A.3 "...BPA will determine whether to proceed..." Another example is B.4.b.i. As a customer, we need to understand the information BPA requests and how it will use that information. We understand the need for BPA to have discretion in the process. We would like clarification about how BPA may use that discretion to support getting to an acceptable plan of service.

City Light asks that BPA commit to use best efforts to resolve questions about TSRs and gaps in data before declining queue requests. B.2, B.4.c, C.2, E.1.c, G, H.3 are examples where BPA gives the result that a request will be declined. That BPA would decline a request is an absolutely understandable outcome in certain circumstances, and we do not wish to appear to limit BPA's discretion. We seek to understand BPA's needs so that we can work cooperatively with BPA.

B.3 is an excellent case where BPA is adding consideration of customer requests and making efforts to accommodate requests. City Light thanks BPA for doing so, and encourages more examples of such clarity and coordination with the customer to gain the required information and get to a plan of service.

As we all are responding to the COVID-19 pandemic as our highest priority, City Light requests that BPA provide consideration to comments in the future from City Light and other interested parties on this topic. Moreover, at a future date, when City of Seattle and Seattle City Light leadership's primary focus is no longer the emergency response, the City Light leadership may revise positions provided in these comments.

If you have questions or would like more information, please contact me.

Thanks

Eric Espenhorst

Seattle City Light

Regional Affairs