

July 16,2019

Via Email ([techforum@bpa.gov](mailto:techforum@bpa.gov))

Bonneville Power Administration  
Transmission Services

**Shell Energy North America's (SENA) comments on Bonneville Power Administration's (BPA) proposed changes to TSR Study and Expansion Process Business Practice.**

SENA appreciates this opportunity to comment on BPA's proposed changes its TSEP Business Practice.

SENA wishes to provide comment on the proposed section:

D. Option to Study TSR for Conditional Firm Service (CFS) item 2.

*"If a customer does not request BPAT to study conditional curtailment option in the Study Agreement, then the TSR(s) will not be eligible for CFS study at a later time."*

SENA seeks clarification from BPAT that when a customer submits a Long-term Firm Transmission Service Request (TSR) as part of a Cluster Study that once the study is complete the customer and BPAT are not be precluded from discussing a Conditional Firm Service if, as a result of the study, sufficient Available Transfer Capability (ATC) was not available all hours during the time period requested. SENA believes it is not appropriate to restrict the service type requested prior to the study and it is better to determine what transmission service can be offered based on the results of the study.

Thank you for your consideration of this comment.

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