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To: [Tech Forum](#)
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Subject: [EXTERNAL] Draft NT Business Practice Comments
Date: Thursday, February 18, 2021 12:43:08 PM

Hi,

Please see comments below regarding the draft NT Business Practice submitted on behalf of PNGC Power, Northwest Requirements Utilities, Western Public Agencies Group, and Clatskanie PUD. Section D Reserving Transmission Capacity for Forecasted Non-federal Network Resources, 3(c). How does BPA deal with encumbering transmission for variable resources? Does the forecast, which is used to encumber transmission assume the full nameplate capacity of the project or some energy volume based on a capacity factor analysis of the generating unit? This methodology needs to be address and discussed.

Thank you,

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