

August 14th, 2024

BONNEVILLE POWER ADMINISTRATION
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Submitted via email: techforum@bpa.gov

Comments on July 30th TC-26 Pre-Proceeding Workshop

Seattle City Light (City Light) appreciates BPA's efforts to actively engage, facilitate workshops, and be responsive to customers regarding BP-26 Rate Case and TC-26 Workshop topics. City Light would like to offer the following comments for BPA's consideration.

Network Loss Factors

City Light supports the staff recommendation to maintain the current two season loss factors determined by the current loss factor study methodology.

ROFR Queue Management

City Light supports the staff recommendation to change the tariff language regarding ROFR for alignment with BPA practices.

Transmission Line Ratings FERC Order 881

City Light thanks BPA for outlining the rationale behind the deviations from Order 881 and supports BPA's planned implementation.

GI Reforms

City Light supports BPA proposed changes to the LGIA including the updated definitions.

EIM Charge Codes

City Light generally supports BPA's approach to follow cost causation principles and industry best practices.

Persistent Deviation Language

City Light supports BPA staff recommendation to change the tariff language to provide greater clarity regarding Persistent Deviation charges. City Light additionally supports BPA following cost causation principles regarding applying charges to entities in instances where actions cause a cost to BPA.

New Technology Pilot

City Light supports the BPA staff recommendation proposing more general language to allow all new technologies to be included in the technology pilot program.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light