

June 6th, 2024

BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on BPA May 22nd, BP-26 Rates TC-26 Tariff Pre-Proceeding Workshop

Seattle City Light (City Light) appreciates BPA's efforts to actively engage, facilitate Customer-led 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.

Transmission Line Ratings - FERC Order 881 Implementation

City Light supports BPA's overall approach to implementation of FERC Order 881. City Light suggests that there would be value in BPA developing explanatory material supporting BPA's decision to not follow the *pro forma* language.

ROFR Queue Management

City Light supports BPA's Alternative 2 to change the Tariff to harmonize BPA's practices fully with the Tariff.

Western Resource Adequacy Program (WRAP) in BP-26

City Light supports continuing the WRAP principles put in place in BP-24. City Light additionally supports the BPA proposal for Above-RHWM Load and New Large Single Loads.

Intentional Deviation in the EIM

City Light suggests BPA continue to closely monitor the impacts of VERs scheduling off forecasts and consider how any future policy changes may cause cost shifts between customer groups.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light