

July 16, 2018



Bonneville Power Administration  
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Submitted via [techforum@bpa.gov](mailto:techforum@bpa.gov)

**RE: TC-20 Comments**

Bonneville Power Administration (BPA) has requested customers submit comment with regard to its TC-20 Tariff Workshop specifically related to Hourly Firm and other issues therein.

Franklin PUD No 1. (Franklin) serves its customers utilizing a Point-to-Point (PTP) Transmission agreement with BPA. As a PTP load serving customer in the BPA Balancing Authority (BA), Franklin relies on the firm hourly PTP product to both serve its load from short term market purchase and also to move and deliver its surplus power to the market as a Slice customer.

Franklin supports any alternatives that offer a firm hourly product in the BPA BA or allows the ability to shape firm PTP transmission hourly in the following order of preference.

1. Unlimited Hourly Firm
2. Limited Hourly Firm
3. Shaped daily firm product, assuming it would allow a single hour redirect or a purchase based on Available Transfer Capacity for a specific hour to be used.

Over the course of the past transmission rate cases, BPA has slowly implemented changes that have increased the difficulty of the scheduling process for PTP contract holders, such as Franklin. BPA's current motivation to eliminate the Hourly Firm product and what this would achieve is unclear to Franklin. Eliminating or limiting the Hourly Firm product that Franklin relies upon could result in increased curtailments to Franklin's load due to increased scheduling on non-firm hourly PTP transmission and an inefficient use of transmission by using daily firm to cover hourly firm needs.

Should BPA Transmission actions limit or eliminate the Hourly Firm product to which Franklin relies, we propose BPA to be open to allowing Franklin a switch from PTP to Network Integration (NT) Transmission Service.

We understand the challenges that BPA has to serve its customers fairly and collaboratively, would like to thank BPA for allowing comment in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Dohrman", written over a white background.

Holly Dohrman  
Assistant General Manager/Power Management

C: Central Files

LTR 2018-226