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March 31, 2020

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**Subject: TEMUS Comments on the March 17, 2020 TC-22, BP-22 and EIM Workshop**

Matt:

BPA's March 17<sup>th</sup> workshop touched on several topics on which TransAlta Energy Marketing (U.S.) Inc. ("TEMUS") appreciates the opportunity to comment. The topics and comments are enumerated below. Slide numbers refer to the main presentation<sup>1</sup>.

1. Integrated Scope at slide 13: Venn diagrams stage a come-back. The diagram and grouped columns are very helpful for tracking in what venue(s) topics are being debated and decided. Please continue to use this format and consider that it could also be used to efficiently highlight the topics planned for the next workshop.
2. Issue #16 Seller's Choice: TEMUS supports better access to low-cost resources and improving an NT customer's ability to buy non-federal power from suppliers at MIDC and deliver it to their load. For Step 3 at the April 28<sup>th</sup> workshop, please comment on whether implementing Seller's Choice has any impact on ATC due to designating or undesignating resources, or encumbering capacity for NT service. How that works is unclear.
3. Issue #9 Transmission Losses: Using the description of alternatives on slide 32, TEMUS supports 3 and 5, provided two details are considered in implementation. For both alternatives 3 and 5, TEMUS assumes—recommends, if necessary—that customers be able to choose their loss return method throughout the year.

For alternative 5, TEMUS supports what appeared to be consensus among the workshop participants who concluded that "concurrent" should *not* mean returning losses with every individual e-Tag schedule, which would create an unnecessarily duplicative scheduling burden on customers. TEMUS supports a daily aggregation, perhaps by heavy and light

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<sup>1</sup> Main presentation - <https://www.bpa.gov/Finance/RateCases/BP-22-Rate-Case/Documents/17Mar20%20-%20Main%20Tariff-Rates-EIM%20Workshop.pdf>

load period, that is returned the next preschedule day. While not exactly concurrent, this method would strike a balance between improving upon the current 168-hour delay and significantly reducing customers' administrative burden.

4. Issue #35 De Minimis: Using the alternatives listed on slide 106, TEMUS supports alternative 2. BPA is clearly concerned about the potential accumulation of individual de minimis impacts, but in the absence of an analysis that definitively demonstrates the likelihood of this occurring, TEMUS cannot back the other suggested alternatives.

## **TRANSALTA ENERGY MARKETING (US) INC.**

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