

August 26, 2019

Via Email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of Avangrid Renewables, LLC on the *De Minimis* Impact Dead-Band for Network Flowgates

Avangrid Renewables, LLC, (“Avangrid”) hereby submits comments to the Bonneville Power Administration (“BPA”) concerning an issue raised during the implementation of the TC-20 Settlement Agreement regarding the application of *De Minimis* Impact Dead-Band for Network Flowgates, Version 15 document (the “*De Minimis* Document”).¹ At the August 6, 2019 workshop, Katie Sheckells asked for comments from stakeholders to better understand the scope of this issue and how many customers are experiencing unexpected impacts.

On process, Avangrid understands that a sufficient number of transmission customers are experiencing unexpected impacts related to the application of the *De Minimis* tests. BPA should therefore prioritize this issue and create a plan to conduct customer workshops as soon as reasonably practical.

On substance, Avangrid believes the treatment described in the *De Minimis* Document is good policy and should be applied to all requests types to avoid imposing unnecessary barriers to granting service that might arise from inconsequential quantities that don’t have a meaningful or measurable impact to the system. We respectfully request more transparency around BPA’s application of the *De Minimis* Document to better understand this issue.

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Avangrid appreciates the opportunity to submit these comments and looks forward to working with BPA on this issue. By return e-mail, please confirm BPA’s receipt of these comments.

¹ Available at https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Documents/deminimis_impact_dead_band.pdf.