

To: Tech Forum

Subject: [EXTERNAL] Determining De Minimis Impacts

Greetings:

In response to BPA's request for input at its August 6, 2019 TC-20 Settlement Implementation update, on its decision to not use the "de minimis" test for redirects, Constellation offers the following comments.

Constellation previously reached out to BPA, due to the significant changes encountered when BPA no longer offered "unlimited" ATC starting July 1, 2019. Frankly, the impact on access to ATC is quite different from what we expected.

The recent statement that BPA is not using the de minimis test for redirects is of concern, as that may be further limiting the ability to use BPA transmission. The De Minimis Impact Criteria described in BPA's ATC document entitled "De Minimis Impact Dead-band for Flowgates, Version 15" appears to apply to all TSRs. This interpretation seems consistent with the Requesting Transmission Service Business Practice (dated 6/24/19).

Constellation believes that the de minimis test issue is of sufficient concern to a number of BPA customers to warrant timely attention. As a suggestion, we would appreciate BPA including this topic on its September 26, 2019, TC-20 Implementation Update agenda.

We plan to provide more comprehensive comments on our experiences with the changes that BPA has made to the Hourly Firm product during your formal comment period.

Thanks much for your interest in our comments and attention to this matter.

Carol Opatrny

Consultant to Constellation