



June 12, 2020

Seattle City Light (SCL) appreciates the Short-Term *De Minimis* Update on May 29, 2020 and BPA's ongoing engagement with customers on this topic. SCL remains committed to constructively finding a mutually beneficial outcome to this issue. However, we do not believe that the two options presented on May 29 accomplish this, and that additional work and discussion is necessary before this topic is resolved.

SCL is disappointed with the limited remaining options presented by BPA on May 29 and does not support Option 1 or Option 2. Neither option allows customers to retain the full value of their long-term BPA transmission portfolio. Additionally, we remain concerned that under these options, redirects might continue to be treated less favorably than a new short-term request.

SCL continues to ask BPA to apply the current Test 1 and Test 2 to the short-term horizon, consistent with Parties' understanding of how the *de minimis* test was applied at the time of the TC-20 Settlement. BPA has not demonstrated a material negative impact to reliability by applying both *de minimis* tests to short-term redirects. BPA's resolution of the *de minimis* test issue should afford benefits and flexibility to customers. The current options presented by BPA do not accomplish this.

SCL thanks BPA for the opportunity to provide comments and looks forward to our continued discussions. If you have any questions about these comments, please contact Stefanie Johnson at 206.386.4539 or stefanie.johnson@seattle.gov

