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To:	Tech Forum
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Subject:	[EXTERNAL] Snohomish PUD Comments in response to January 28, 2020 - TC-22, BP-22 and EIM Phase III Workshop
Date:	Tuesday, February 11, 2020 4:31:31 PM

Thank you for the opportunity to submit comments related to the topic, "Exploring Section 7(f) Power Rate Options," discussed at the TC-22, BP-22 and EIM Phase III Workshop held January 28, 2020. Snohomish is interested in additional discussions related to the risks such service and rate re-design could potentially pose to BPA.

With regard to the NR Rate, Snohomish asks that BPA clarify the timing, availability and market risk the NR rate could potentially pose to BPA as a discretionary Tier 1 System obligation. Staff's current understanding is that only BPA customers contracting for the Load Following product are eligible to purchase energy at the NR rate. Snohomish seeks additional clarification on:

- the process, binding commitment and qualifications required for a customer to secure service at the NR rate.
- the basis or methodology for a re-design of a new NR Rate; and
- the applicable terms and conditions associated with the service and rate.

It is not clear how or if BPA would augment the Tier 1 system capability in order to provide energy at the NR rate. Snohomish also has interest in exploring the conditions under which a new Firm Surplus rate would be applicable. Our understanding is that Firm Surplus service is contingent on availability, and therefore would not require augmentation if resources were not sufficient to meet BPA's designated obligation. Again, we would be interested in understanding:

- the process and qualifications required for a customer to secure service at the Firm Surplus rate
- the basis or methodology for a re-design of a new Firm Surplus Rate; and
- the applicable terms and conditions associated with this service and rate.

We look forward to future discussions on these topics.

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