



*Commissioners*

Nancy E. Barnes  
Jim Malinowski  
Jane A. Van Dyke

*Chief Executive Officer/  
General Manager*

Wayne W. Nelson

June 21, 2018

Re: COMMENTS OF CLARK PUBLIC UTILITIES ON TC-20

Available Transfer Capability

Clark Public Utilities appreciates BPA's presentation on ATC and is supportive of BPA exploring ways to make efficient use of its transmission system. With respect to load growth assumptions, we are supportive of BPA working closely with customers on load forecasts as part of the NT dialogue process to ensure that BPA is appropriately planning the system and enabling economic development in the region. We also support BPA's planning for network load growth in its calculation of existing transmission commitments (ETC), consistent with BPA's obligations under its open access transmission tariff, including Section 28.3, which calls for the transmission provider to provide firm transmission service over its transmission system to the network customer for the delivery of capacity and energy from its designated network resources to service its network loads.

Clark Public Utilities is also very supportive of BPA staff's comments that they will encumber capacity for NT resource forecasts based on the highest impact on each flowgate for all accepted NT forecasts. This will allow Clark Public Utilities to procure combinations of designated resources that make the most efficient use of BPA's transmission system on a planning basis.

TC-20 Procedural Schedule

The most recent redlined OATT produced by BPA staff has many sections that are incomplete and/or marked as under review at this time. In addition, BPA recently released proposed guidelines for how it will make deviations from FERC *pro-forma*, but has not yet finalized these guidelines in light of customer feedback last month. BPA has yet to release a comprehensive set of changes it intends to make along with the proposed tariff language. Until BPA produces a final set of issues that it will address, along with proposed tariff language, it is difficult for Clark Public Utilities to comment on the appropriateness of the procedural schedule. That said, to the extent these outstanding issues are addressed, we generally support the alignment of the TC-20 and BP-20 RODs.