



Your Community Energy Partner

August 6, 2018

Submitted via email to: comment@bpa.gov

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905 NE 11th Ave
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**Re: Comments of Public Utility District No. 1 of Snohomish County on
BPA's TC-20 Process and July 23 Workshop Topics**

Snohomish appreciates the opportunity to comment on Bonneville Power Administration's (BPA) TC-20 process, specifically the topics discussed at the July 23 workshop. These comments address topics related to BPA's proposals related to the Business Practice process.

Business Practices Definition

As Snohomish recommended in its May 30, 2018 comments, Bonneville should include a Business Practice definition in the tariff that reflects FERC's "rule of reason" standard. A definition will clearly establish the standard by which Bonneville and its customers can evaluate whether a particular provision belongs in the tariff or a business practice.

Business Practices Process

Snohomish supports the improvements to the Business Practice Process that Bonneville noted on slides 23 and 24 of the July 23, 2018 presentation. In particular, we believe that a more interactive process between Bonneville and its customers at the beginning of the process. i.e., before a draft business practice is issued, will be beneficial. Snohomish believes that this engagement will be particularly useful in cases where the Business Practice is either newly proposed, or when a change could have significant impacts to customer operations.

In addition to BPA's currently proposed revisions, Bonneville should consider an avenue for customers to appeal a Bonneville management decision on business practices to the Administrator. Finally, we recommend that Bonneville formally include these changes in its "BPA Transmission Business Practice Development" document.

Conclusion

Snohomish appreciates the opportunity to comment on these issues. If you have any questions about Snohomish's positions or proposals, please feel free to contact me.

Sincerely,



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