

March 31, 2020

*Submitted via Tech Forum*

**RE: NRU Comments on 3/17/2020 EIM/BP/TC-22 Workshop**

Northwest Requirements Utilities (NRU) submits the following comments on two topics from the 3/17/2020 EIM/BP/TC-22 rate case workshop.

**Seller's Choice**

NRU represents the interests of 53 Load Following utilities across the Pacific Northwest. They rely on BPA-Transmission Services to deliver both federal and non-federal resources to serve their retail loads. On behalf of the NRU membership, we first want to acknowledge BPA's willingness to include the Seller's Choice modification in its Open Access Transmission Tariff ("Tariff"). The result of this action has improved NT customers' ability to access the Mid-C market and deliver non-federal market purchases to load, the importance of which is explained in greater detail below.

As part of the TC-20 implementation, BPA is required to evaluate the impacts of the Seller's Choice option. On March 17, BPA provided additional context regarding Seller's Choice and some of the factors to be considered in that analysis. NRU would like to share additional context from the NT customer perspective. Seller's Choice is critical for NT customers to access Mid-C market purchases, as most counterparties who transact at the Mid-C are either unable or unwilling to abide by the NT Network Resource limitation included in the pro forma Tariff, which mandates that NT customers identify the Balancing Authority Area from which their market purchase will be sourced on a long-term basis. Said differently, under the pro forma Tariff, a supplier must be able to identify the specific source on an annual basis in order for an NT customer to use long-term firm transmission to deliver that market purchase to load. It is important to note that NT customers are unable to redirect, which is a right that allows PTP customers to access long-term firm transmission without having to initially identify the source at the time of the request for transmission. Thus, this is not a question of getting a better price or reducing

administrative burden—this is about being able to access the market on a level playing field with PTP customers.

In preparation for the Seller's Choice impact evaluation, we ask that the following information be provided to enhance BPA and customers' ability to understand the impacts from Seller's Choice implementation:

- Identify the total number of Mid-C reservations and schedules (both in count and MW) that are using the Seller's Choice option relative to all other Mid-C reservations (both in count and MW, both PTP and NT).
- Provide a qualitative analysis regarding how transmission planning visibility is impacted by Seller's Choice relative to the use of PTP redirects.
- Identify the total net MW impacts from the using the Seller's Choice option compared to a single MID-C TSR (e.g., BPAT.CHPD)

Again, NRU appreciates BPA's efforts on implementing Seller's Choice. We look forward to the evaluation process and the continued discussions in the TC-22 process to continue to include Seller's Choice in BPA's Tariff.

#### **Additional Day of Monthly Workshops**

NRU supports BPA staff's proposal to add an additional day of monthly workshops to tackle EIM/BP/TC-22 rate case issues. These issues are highly complex and interrelated, and additional time for productive conversations is welcome.