



OCTOBER 13, 2020

City Light is a member of the Public Power Council (PPC) and supports PPC's comments regarding the September 29, 2020 TC-22, BP-22, and EIM Phase III workshop. In addition, we offer the following comments.

City Light supports an EIM Charge Code allocation that preserves the value of customers' existing long-term firm transmission rights already paid for under the OATT. BPA's proposal would impact City Light's ability to utilize our long-term transmission rights after T-57 to balance our load and maintain reliability. As an EIM entity, City Light is required to balance to a load forecast at both T-80 and T-60. City Light relies on our long-term BPA transmission rights to support internal resource schedule changes and bilateral transactions necessary to meet the T-60 load forecast. The timing between the T-60 load forecast update and BPA's proposed scheduling deadline of T-57 does not leave customers with enough time to make these necessary adjustments. This creates an unreasonable constraint on utilizing OATT rights and makes it likely that customers would incur additional charges to utilize these rights.

Additionally, City Light believes that BPA's proposal to not allocate congestion rent to customers who donate transmission to the EIM could create an unintentional disincentive for donation and could potentially result in less transmission available to facilitate EIM transfers.

City Light thanks BPA for the effort put into the TC-22, BP-22, and EIM Phase III process and workshops, and appreciates BPA's consideration of these comments.

