



Seattle City Light submits these comments in response to the TC-22, BP-22, and EIM Phase III Workshops held on June 23 and 24, 2020. City Light is a member of the Public Power Council (PPC) and supports its comments. Additionally, we offer the comments below on Network Usage and the TC-20 Hourly Firm Update:

Network Usage and Non-Firm Transmission Donations

Seattle City Light supports BPA's proposal to allow both firm and non-firm PTP transmission to be donated for EIM transfers and is thankful for the consideration BPA staff has given this issue. ETSR transmission is the foundation of an efficient EIM solution and supports both energy and Flexible Ramp Product transfers between EIM entities.

As BPA proceeds with this proposal, City Light suggests that BPA address the potential impact of BPA's current practice of selling non-firm on an unlimited basis. If non-firm transmission is sold in excess of available capacity, it could impact the market results, particularly as related to the potential for transfer deviations in the window between the Fifteen Minute Market (FMM) solution and the Real Time Dispatch (RTD) solution. In light of this, we ask that BPA develop a means by which it can limit the quantity of non-firm transmission sold or donated so that it does not exceed ATC.

Hourly Firm

City Light was pleased with BPA's announcement that it will be retaining Hourly Firm for the upcoming rate period. As City Light has mentioned on numerous occasions dating back to the Pro Forma Gap Analysis workshops, Hourly Firm is an important product that City Light relies upon to balance variable loads and resources. We appreciate the time and effort that BPA staff has devoted to this analysis.

