

## City Light comments regarding LARP

City Light appreciates the opportunity to provide comments to BPA regarding their Long-Term ATC Review Process including associated Tariff language. City Light supports BPA's proposal to stop calculating and posting LT ATC values and overall approach to the large number of TSRs BPA is currently receiving.

BPA asked customers for feedback regarding the example bi-monthly commercial powerflow study report provided. City Light believes the detail granularity of this report is not sufficient for a third party to objectively ascertain whether the binary outcome of a TSR being granted or not granted is valid. City Light believes BPA should plan on having greater resources available to assess TSRs more rapidly and provide a high level of transparency. This would provide greater value to customers.

City Light additionally suggests that BPA retain both CTIM and providing "What if" analysis for customers. To limit the administrative burden on BPA, City Light suggest limiting the number of "What if" desires an entity can request to once every bi-monthly study period.