



Energizing Life in Our Communities

June 6, 2024

Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

Via email: TechForum@bpa.gov

RE: Comments regarding May 22nd TC-26 Workshop

Snohomish appreciates the opportunity to provide feedback to the Bonneville Power Administration (BPA) regarding the BPA TC-26 Workshop topics. We appreciate BPA staff, customers, and stakeholders for their engagement on these issues and for the forum to consider customer perspectives.

Rights of First Refusal (ROFR) Tariff Change Proposal

Snohomish supports BPA's "Alternative 2" proposal to change the language of Section 2.2(a) of BPA's Tariff to align with BPA's existing process to offer ROFR to customers who request at least five years of service. Snohomish experienced a scenario in which we would have lost rollover rights on a Long-Term request had BPA enforced strict implementation of a *pro forma* policy of granting ROFR rights to firm service customers with a contract term of five years or more.

Snohomish maintains 20% ownership of the Packwood Hydroelectric Project, a dedicated resource within our long-term power portfolio that requires acquiring BPA transmission service from the project to our load. In August of 2018, Snohomish submitted a Long-Term Firm Redirect request for service from 1/1/2019 to 10/30/2026, with the intention to exercise rollover rights. (Because the parent reservation of the Redirect had a termination date of 9/30/2026, we were unable to request a Redirect term beyond that date.) As service could not be granted at that time, Snohomish submitted the Transmission Service Request (TSR) to the 2019 TSR Study and Expansion Process Cluster Study, which was then re-evaluated through the 2020 and 2021 Cluster Studies. After ATC analysis and evaluation of the 2021 Cluster Study, BPA was able to make a partial term offer of Conditional Firm Service to Snohomish with a start date of 11/1/2021, effectively altering the term of service to 4 years and 11 months. Had BPA imposed a firm requirement of a five-year contract term for rollover eligibility, Snohomish would have lost their ROFR rights and been left with no option but to submit an additional request for service at the bottom of the Long-Term Firm queue.

Snohomish concurs that the process to complete studies and contract approvals are inherently lengthy. Modification of Bonneville's tariff will continue to allow BPA to accommodate new

transmission service needs without procedural setbacks and will provide significant benefits and prevent significant harm when compared to the *pro forma* alternative.

Sincerely,

Kimberly Haugen

Power, Rates & Transmission Management
Snohomish PUD