

These comments are submitted to the Bonneville Power Administration (“BPA”) on behalf of Northwest Requirements Utilities (“NRU”), Western Public Agencies Group (“WPAG”), Eugene Water and Electric Board (“EWEB”), and PNGC Power (collectively, the “NT Customer Group”) regarding the Seller’s Choice issue that BPA has presented to customers as part of its TC-22 workshops.

BPA presented its staff recommendation on July 28, which is to remove the current Seller’s Choice provisions from its Tariff. Prior to July 28, BPA had primarily focused its Seller’s Choice evaluation on the impacts to Available Transfer Capability (“ATC”) and transmission planning, as well as addressing specific customer comments. The NT Customer Group believes that the ATC and transmission planning are the most germane criteria in which to assess whether Seller’s Choice creates any detrimental impacts to BPA or its customers.

Based on BPA’s presentation from July 16, it is clear that the use of Seller’s Choice in FY 2020 and FY 2021 has resulted in de minimis ATC impacts with no more than 44 MWs of additional ATC usage in either year. In terms of impacts to transmission planning, BPA has yet to demonstrate what is meant by planning uncertainty and has relied on vague statements claiming Seller’s Choice somehow hinders its ability to ensure designated network resources can serve network load, but has been unable to demonstrate that Seller’s Choice actually has a meaningful impact on how BPA plans for and manages flows in and around the Mid-C area.

That said, we appreciate BPA’s concern that it is difficult to anticipate future ATC and planning impacts without knowing whether the current use of Seller’s Choice is indicative of future use by NT customers. To alleviate this concern, the NT customer group proposes the following solution: extend the current Seller’s Choice provisions through September 30, 2023 with an annual cap that would limit the total MW demand requested by NT customers. We can discuss the appropriate cap, which should be informed by the 10-year resource forecasts that NT customers will submit in the upcoming NT Dialogue process over the next month.

We would also like to recognize that we share the same concern regarding the significant amount of BPA staff time that was devoted to the Seller’s Choice evaluation that was mandated in the TC-20 settlement agreement. Fortunately, this evaluation is now complete and we see no reason to burden BPA staff with this exhaustive evaluation on a going forward basis. Thus, we would recommend that any evaluation in TC-22 be limited to the implementation of the proposed Seller’s Choice cap described above, which can be easily monitored on OASIS by both BPA and its customers.