



Commissioners

Nancy E. Barnes
Jim Malinowski
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**Chief Executive Officer/
General Manager**

Wayne W. Nelson

July 17, 2018

Re: COMMENTS OF CLARK PUBLIC UTILITIES ON TC-20

NT Network Operating Agreement

Clark Public Utilities does not oppose BPA's preferred alternative of a simplified approach as stated at the June 26, 2018 TC-20 Workshop. We are confident that BPA will develop a base NOA that provides the foundational attributes required of every customer while providing the flexibility to address terms and conditions specific to individual customers in ways not detrimental to the individual customer or any other BPA customer.

NT Redispatch and Attachment M

Clark Public Utilities supports BPA's proposed alternative 4 as presented at the June 26, 2018 TC-20 Workshop. This alternative gives BPA the flexibility to redispatch from resources on a least cost, non-discriminatory manner. It allows BPA to address unforeseeable issues through the business practices obviating the need to change the tariff, a much more arduous process.

Schedule 9

Clark Public Utilities supports BPA's proposal modifying Schedule 9 to expressly link to Schedule 10 "physical feasibility" and capacity forecasts. This clearly limits obligations under Schedule 9 by the capacity forecasted in Schedule 10. We further recommend to clearly state that BPA'S statutory obligations also limit "physical feasibility" as contemplated in Schedule 9.

Hourly Firm

Clark Public Utilities supports BPA's approach toward conforming the sale of Hourly Firm transmission with the FERC Pro Forma tariff. Clark Public Utilities encourages BPA to be responsible in calculating and selling any transmission product such that each customer receives the purchased product as intended. Hourly Firm transmission sales present creditable and unfair threats to longer-term transmission purchased by NT, PTP, and other legacy customers.

NT Conditional Firm

Clark Public Utilities supports BPA's approach toward conforming the NT Conditional Firm transmission product with the FERC Pro Forma tariff. This approach will remove Conditional Firm service from the BPA tariff. This is consistent with our prior comments from the customer groups that BPA has an obligation to plan for and serve NT customers on firm transmission.