

July 15th, 2024

BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on July 8th BPA Data Exhibit Validation Notice

Seattle City Light (SCL) would like to offer the following comments for BPA's consideration.

General Comments:

SCL believes the Data Exhibit Validation Notice is a major change to the BPA Requesting Transmission Service Business Practice and BPA past practice. As a major change, BPA should follow the formal process for these changes.

Identification of the rights to deliver energy to the POR.

SCL would like BPA to consider how the Data Exhibit Validation Notice implementation would limit an entity with large, planned load growth from requesting transmission 10 to 20 years in advance of the need for that transmission. In view of the 12-15 years necessary for major transmission expansion projects, entities need to make requests far in advance of having specific resource contracts or information.

SCL suggests the following wording changes in section 2.d. to allow entities to obtain BPA concurrence and data exhibit validation:

2.d. Other demonstration of business relationship **or need** that creates a reasonable expectation that the transmission service will be utilized consistent with the Generation Facility information cited in the Data Exhibit.

SCL additionally suggests that BPA could designate existing major bus/scheduling points that correspond with subareas of the BPA system experiencing clusters of Generator Interconnection Requests. BPA in the past has shared a heat map of this information. Entities could designate these as PORs with a generic New Point to facilitate requests supporting long-term transmission expansion.

Demonstration of a reasonable expectation that the Receiving Party will may take delivery of the energy at the POD

SCL would like BPA to consider the business necessity of requesting transmission segments to connect existing resources or transmission segments to other existing transmission segments or

intertie points that are not designated marketing hubs. BPA should recognize the business needs of requesters to be able to optimize the use of resources.

SCL suggests the following wording changes in section 3.d. to allow entities to obtain BPA concurrence and data exhibit validation:

3.d. Other demonstration of a business relationship **or need** that creates a reasonable expectation that the transmission service will be utilized consistent with the Receiving Party information cited in the Data Exhibit.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light