

February 10th, 2022

Bonneville Power Administration
via: techforum@bpa.gov

Re: Concurrent Loss Return

To Whom it may concern,

City Light appreciates the background and industry review BPA provided as part of the January 26, 2022, Concurrent Losses workshop. We believe there is insufficient justification from BPA to modify the current Loss Return process that works well for customers. City Light believes there is significant risk to implementing a new Loss Return paradigm efficiently and effectively in the current timeline. City Light recommends BPA consider a broader discussion on this with customers regarding the various parallel initiatives and how customers can best partner with BPA.

City Light has two priorities regarding Loss Returns if a change is to be made:

1. The option for customers to provide physical Loss Returns to BPA be maintained in a way that is not costly or burdensome to customers or BPA for most Loss Returns.
2. Fair and equitable pricing of Financial Loss Returns. City Light firmly believes that Financial Loss Returns are in fact energy sales and should not include an additional capacity charge.

City Light would additionally like to provide the following feedback to BPA regarding the material from the January 26th, 2022, workshop.

KW Remainders: City Light recommends all kW remainders be settled financially.

Loss Return Imbalance: City Light recommends all imbalance be settled financially.

Invalid Loss Returns: City Light recommends assessing a penalty charge.

Loss Obligation Timing and Posting: City Light prefers new Concurrent Loss screen within the BPA Customer Portal if it is possible to build functionality that would allow for 3rdparty loss providers.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light