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**Subject: TransAlta Comments on the BPA – CAISO Coordinated Transmission Agreement**

Matt:

TransAlta appreciates the opportunity to comment on the Coordinated Transmission Agreement (“CTA”), We believe managing Energy Imbalance Market (“EIM”) flows affects all of Bonneville’s transmission customers.

1. TransAlta contends that the scope of the Coordinating Committee should include a process for notifying potentially affected Bonneville transmission customers *before* revisions to the agreement are made or unanticipated operational issues are addressed.
2. The agreement does not mention how exchanged data will be accessible to transmission customers, like via OASIS. TransAlta suggests fixing this by adding a descriptive column to Exhibit B.
3. Section 5.4 Adjustment of Generation: TransAlta supports Bonneville’s stated goal of mitigating risks from excessive or inaccurate curtailments, and we understand that the unique reference to South of Allston is intended to address rare and significant contingency events. However, as an operator of generation near South of Allston, TransAlta is concerned that Section 5.4 lacks necessary specificity. As written, for example, Section 5.4 does not mention the rarity of these exceptional generation adjustments nor does it describe the contingency(ies) that could trigger them. It is also unclear how impacts to all transmission service will be shared equitably if Bonneville must waive limits to EIM Incremental flows during these events, as described in Section 5.7. TransAlta contends that these details are not beyond the scope of the agreement and should be added in a new exhibit. Finally, Bonneville’s transmission customers—who are not party to the agreement and yet who could be impacted by this section—must have some way to participate in the development and maintenance of these details.

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