

Joint Customer Comments Regarding Short-Term ATC
February 14, 2020
Submitted via Tech Forum

Portland General Electric, Puget Sound Energy, Seattle City Light and Snohomish PUD (collectively "the Commenters" or "customers") appreciate this opportunity to provide comments and feedback to BPA regarding the Short-Term Available Transfer Capability (ST ATC) Project Update webinar held on January 30, 2020. Customers want to thank BPA for its engagement with customers through webinars and discussions of this nature. It is helpful to have a forum focused specifically on the more complex topics and we urge BPA to continue working with customers in this way.

Several of the issues and proposals discussed in the January 30 webinar remain unclear. Through these comments, the Commenters are seeking additional clarity and discussion from BPA on the proposed ST ATC Improvement #2 so we can better understand the impacts to our existing systems and processes. Further, we request that BPA not implement these changes until it can provide this clarity and have follow-on discussions on these topic areas.

ATC Calculations associated with Negative ETCs - Proposed ST ATC Improvement #2

At a high level, the Commenters would like to better understand BPA's current ATC calculation (below), and its component parts.

The firm ATC formula is:

$$ATCF = TTC - ETCF - CBM - TRM + PostbacksF + CounterflowsF$$

Specifically, we have the following questions regarding the Proposed ST ATC Improvement #2, (treating negative base ETCs as zero):

1. Customers would benefit from an improved understanding of how ETC and Counterflows are currently calculated:

- Will there be any change to the calculation methodology for ETC to adjust for setting negative ETC values to zero?
- Will there be any change to the calculation methodology for Counterflows to adjust for setting negative ETC values to zero?

2. BPA proposes to set any negative ETC to zero. Customers would like to understand how and when the Counterflow variable is included in the calculation.

- Will negative ETCs still be set to zero if there is no counterflow variable included?
- Will negative ETCs still be set to zero if the counterflow variable and the negative ETC value are not equivalent?

3. Customers request that BPA provide real-world examples of the impact of this change if implemented, including:

- Provide example path calculations with a "Before and After," showing how the calculation would change and the effect on the final ATC value
- Utilize existing path data / conditions to help illustrate the calculation and how the improvement would have helped create a more accurate ATC value

The significant concern by customers is the impact of this proposed set of revisions in combination with other changes or proposals BPA has or expects it will enact, in light of the existing set of challenging transmission issues customers are already facing. Customers are asking that BPA give due consideration to the effect and impacts of revisions to multiple policies and practices. When taken together, they may have a greater impact or effect than what might have been anticipated for any single item. By way of example, when combined with the current application of the *de minimis* test, the proposed ST ATC Improvement #2 could further limit customers' ability to acquire transmission. Customers are seeking a more holistic approach by BPA staff in how it evaluates and then communicates proposed revisions, so customers have confidence that BPA has considered all of the moving parts and how they interact with each other.

We understand BPA hopes to implement the Proposed ST ATC Improvement #2 in March 2020. The Commenters request that BPA postpone implementation of this proposal until BPA can respond to customers' questions and there is an opportunity for a follow-on discussion.

Thank you for this opportunity to comment. If you have any questions or clarifications related to these comments, please do not hesitate to contact us and we look forward to continued engagement on these issues.

Sincerely,

Portland General Electric

Puget Sound Energy

Seattle City Light

Snohomish PUD