

Seattle City Light submits these comments in response to the Tech Forum notice issued January 31, 2020.

As a part of the TC-20 Settlement, BPA committed to consider customer experiences with the hourly firm product as a part of the evaluation and monitoring process. Hourly Firm is an important product for City Light. We are closely tracking the implementation of the changes to hourly firm, as well as the associated evaluation and monitoring process. The outcome of this analysis will impact how City Light and other entities in the region balance loads and resources.

We offer the following comments regarding City Light's experience:

Limitation of Hourly Firm to Day-Ahead

On January 1, the hourly firm product was limited to day-ahead. Without a firm product available in the real-time horizon, City Light can no longer offer real-time hourly operating reserves. This additional limitation of the hourly firm product has introduced inefficiencies in the market, as entities in need of reserves within the current day have fewer options and entities with available reserves do not have a way to provide them without an existing firm transmission path between the seller and the buyer.

Other Short-Term Transmission Issues

As City Light mentioned in comments provided October 25, 2019, the customer experience with the limited hourly firm product cannot be separated from other short-term transmission issues and policies. For example, City Light's experience with limited hourly firm has been impacted by BPA's application of the *de minimis* tests utilized for short term redirects. Thus, we continue to encourage BPA to take a comprehensive look at these items.

A primary concern of City Light is that changes to a number of BPA's policies and practices over the past eight months have greatly reduced customers' ability to redeploy long-term firm transmission service in the short-term horizon. As a result of these changes, City Light has experienced uncertainty in serving our load. Specifically, we have had difficulty reserving transmission to deliver BPA power; we also have been unable to obtain firm transmission for periods up to one year in the future. Moreover, non-firm transmission availability has also become highly constrained with the implementation of new power flow management tools to support dispatchers during planned outages and when power flows exceed forecasts assumed for reliable operations.

Together, the combination of multiple revised policies and practices have created challenges for City Light. We appreciate this opportunity to provide feedback on our experience, and we look forward to continued engagement on these issues and their collective impact.