

Submitted 10/25/19

Seattle City Light submits these comments in response to the Monitoring and Evaluation Plan discussion at the September 26, 2019 TC-20 Settlement Customer Workshop.

City Light appreciates this opportunity to provide feedback. The changes associated with TC-20 are multiple and layered, both for BPA and for its customers. City Light has found that the changes to date, when taken together, can have more severe impacts than what might have been anticipated for any single item. While not specific to the hourly firm discussion, City Light is interested in learning more about where in its processes BPA is being deliberative about the TC-20 changes, staging them based on importance, and assessing and how those changes are collectively impacting customers. For example, either the changes to hourly firm or the recent changes to assumptions regarding short term TTC seasonal default ratings have an impact on City Light; together, they pose more complex challenges. Limiting hourly firm and making TTC changes to flowgates with little notice has left customers struggling to deliver to load. City Light has experienced instances when we have had to rely on non-firm transmission to deliver Block energy, and hours when non-firm transmission has not been available. Moreover, without a full picture of all the moving parts and how they might impact each other, it is difficult for customers to meaningfully respond to proposals and participate in stakeholder workshops.

As we move forward, City Light is particularly interested in BPA's assessment of risk associated with limiting hourly firm. A reliable system is undoubtedly of critical importance but, taking into account the challenges to expanding the physical transmission system and the needs of BPA's customers, it is important that BPA maximizes the available facilities in order to minimize the likelihood of unused capacity. City Light is concerned that without first defining the appropriate level of risk, and providing details about how BPA makes this determination, the firm capacity buffer (FCB) or any other metric developed for this evaluation offers little usefulness.

Additionally, any assessment of risk and subsequent changes to policy should also take into consideration the impact on customers. It is possible that changes might not remove or lessen risk, but instead shift risk to customers who do not have other options. BPA has indicated that it is committed to being a dependable and responsive business partner as it proactively navigates a changing environment. Customers cannot be left behind in how these changes are being considered and implemented.

City Light is interested to know if BPA considered using any existing metrics (such as transmission reliability margin) to avoid creation of new metrics, and if so, why those metrics were not acceptable for this purpose. Any risk metric developed or utilized by BPA should give meaning to what BPA is accountable for, and how it is balancing both its technical and commercial obligations. In light of recent reductions to TTC, we are concerned that risk metrics such as the FCB, which places a value on the margin between TTC and firm usage, could be unnecessarily conservative if it is not valuing the correct measures.

With regard to the specifics of the update on the Monitoring and Evaluation Plan, much of the data presented compares different months of the year to one another. BPA explained that it only collected data from February 2019 to June 2019 to utilize in its assessment of the change to limited hourly firm. It is difficult to draw meaningful conclusions comparing data from months that have different generation and load profiles. We encourage BPA to find ways to utilize data from prior years, to supplement what has already been provided.

