

March 13, 2019

Michelle Cathcart  
Bonneville Power Administration  
905 NE 11<sup>th</sup> Avenue  
Portland, Oregon 97232

*Electronically submitted via BPA techforum*

Re: Comments of Point-to-Point Customers to February 26 Hourly Firm Evaluation Planning Workshop

Ms. Cathcart:

Constellation believes that the Hourly Firm product has significant value and is pleased that BPA is engaging with its customers in order to develop a rigorous analytical framework, that is data-driven and objective. We recognize the import of this analysis, as it lays the groundwork for the decisions that will affect the Hourly Firm product during the TC-22 proceeding.

We support the letter submitted on behalf of Avangrid Renewables, LLC, Avista, Portland General Electric Company, Public Utility District No. 1 of Snohomish County, Puget Sound Energy, Sacramento Municipal Utility District, Seattle City Light, Shell Energy North America, and Transalta Energy Marketing (U.S.) Inc. Importantly, we concur with the recommendation to allow for additional opportunities to discuss, develop, and comment on the analytical framework. We also believe that the proposed evaluation schedule would be very helpful to ensure what continues to be a collaborative effort.

We believe that the evaluation should allow for a particular focus on the *actual curtailments events* that have occurred over the past three-four years. This should include system conditions such as any outages (generation and transmission), contingency events, system operating limits as well as set-asides impacting TTC and ATC, unavailability of analytical or topology tools, then-current long-term and short-term ATC methodologies/calculations, etc. Given that it is curtailments that the agency has expressed concern to avoid, it seems helpful to better understand the specific circumstances that contributed to the actual curtailment events.

We are also very interested in the agency's plans to update or refine its ATC methodology(s), and the extent to which such effort may improve awareness of ATC or FATC so to also improve the situational awareness of making short-term ATC/FATC available.

Thank you for your efforts to date. Again, we value the Hourly Firm product and believe that it can be improved in a manner that satisfies BPA while maintains functionality that satisfies BPA's customers.

Sincerely,

/s/

Mary Lynch  
Director, Wholesale and Market Development  
Constellation Energy

cc: Jennifer Solomon  
Carol Opatrny