

Customer Comments

Subject: Seattle City Light Comments – De Minimis Impact Dead-Band for Flowgates

Submitted: August 23, 2019

Seattle appreciates the opportunity to comment on the De Minimis Impact Dead-Band issue that was discussed during BPAT's TC-20 Settlement implementation update workshop held August 6, 2019 from 9am-11am via Webex.

In addition to Seattle, we believe there are a sufficient number of customers that have had similarly unexpected detrimental impacts, arising from the inconstant application of the De Minimis Impact Dead-Band, to warrant BPAT's attention. Therefore, Seattle encourages BPAT to prioritize the issue and engage with customers to find solutions as soon as reasonably practicable.

Moreover, Seattle believes that the treatment as described in the supplemental ATC document "*De Minimis Impact Dead-Band for Flowgates, Version 15*" is good policy for all transmission service requests because it avoids imposing unnecessary barriers to granting service arising from inconsequential quantities that don't have meaningful or measurable impact to the system.

Sincerely,

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