



City of Seattle

Edward B. Murray, Mayor

Seattle City Light

Jorge Carrasco, General Manager and CEO

July 8, 2014

Bonneville Power Administration (via [Techforum@bpa.gov](mailto:Techforum@bpa.gov))

Partial Long-Term Firm Service, Version 8

To whom it may concern:

Thank you for soliciting customer comments on Version 8 of the Partial Long-Term Firm Service Business Practice. Seattle City Light (Seattle) appreciates the opportunity to comment and respectfully asks that BPA reconsider the proposed time a Customer has to submit a Remainder Transmission Service Request (TSR).

If a Partial Service offer is made to the Customer, Version 7 gives the Customer 15 days to submit the new Child TSR for the remaining capacity from the date the Parent TSR is changed to CONFIRMED status. Version 8 reduces the 15 days to submit a request for the Remainder to the same day the Customer changes the TSR's status to CONFIRMED. While Seattle isn't opposed to a reduction in the overall time period the Customer has to submit for the Remainder, the proposed reduction is too great and could result in lost transmission service.

Seattle suggests that instead of allowing 15 days to submit the Remainder, the time period be reduced to 5 days. Giving the Customer 5 days to submit the Remainder will allow for unforeseen circumstances, holidays, illness, etc. which could delay the Customer in being able to submit a Remainder request. Having more than a same day window is important when dealing with such a crucial business product like TSRs. Allowing the Customer a window of 5 days will give a needed cushion in the event of unforeseen circumstances and effectuate BPA's desire to reduce the current window.

Seattle greatly appreciates the opportunity to submit comments on this issue. Should you have any questions regarding these comments, please don't hesitate to contact me at (206) 386-4537 or [sarah.davis@seattle.gov](mailto:sarah.davis@seattle.gov).

Respectfully submitted,

A handwritten signature in blue ink that reads "Sarah Davis".

Sarah Davis  
Sr. Power Analyst  
Seattle City Light