



Your Seattle City Light

January 31, 2013

Bonneville Power Administration – Transmission Services (BPAT)
TechForum@BPA.gov

Subject: Proposed Business Practice Simultaneous Submission Window Processing and Short-term Competitions: Resale/Redirect Billing Proposal

Seattle City Light ('Seattle') appreciates the opportunity to provide comments in response to The Bonneville Power Administration Transmission's (BPAT's) Simultaneous Submission Window (SSW) Business Practice Version 1 and the Short-term Competitions: Resale/Redirect Billing Proposal (ST Competitions Billing Proposal).

Seattle values BPAT's consideration of customers' input in developing the SSW Business Practice Version 1. As stated in Seattle's comments on June 8, 2012, Seattle preferred the pro-rata allocation approach over the lottery approach since the pro-rata allocation enables some portion of a transaction to be scheduled. Customers who are not selected in a lottery will now be required to unwind energy or capacity transactions. In light of this and the possibility of other unanticipated impacts, Seattle hopes that BPAT remains open to assessing with its customers the effectiveness of its lottery allocation methodology, the unanticipated impacts, and considering mechanisms for improvements. Further, Seattle would greatly appreciate a follow-up meeting in the Customer Business Process Improvement (CBPI) forum in May 2013 to review and discuss experience/challenges faced by the customers and BPAT and opportunities for improvements.

Seattle is thankful for the efforts of BPAT staff in creating its ST Competitions Billing Proposal. Seattle believes that BPAT has developed a reasoned and fair-minded approach that reflects its general obligations under its Open Access Transmission Tariff (OATT) Transmission Service Provider (TSP) as well as FERC directives prohibiting charging customers twice for the same capacity. Further, in light of the complexity of administering billing credits for redirects of resales subject to Short Term Preemption and Competition, Seattle believes that BPAT's proposal for crediting the assignee at the full tariff rate struck a satisfactory balance between administrative complexity and providing a billing credit.



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In closing, Seattle would like to acknowledge the efforts of BPAT staff members to consider and include customer feedback on implementation details, particularly as it relates to Short-Term Competitions Billing.

Respectfully submitted,



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cc: Toni Timberman, BPAT - Portland



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