

Thank you for the revisions under consideration. Seeking to reduce the number and magnitude of curtailments due to SOL concerns when there are overgenerators by targeting those overgenerators is a great idea. Revising the window for calculating FTC is also a welcome change.

BPA should consider contacting other generators that may be able and willing to adjust generation in order to reduce SOL concerns. Some small generators are unable, due to not being staffed at certain hours or not able to ramp, to comply with curtailment directives. If BPA contacts those generators that can change generation, rather than those that cannot, BPA can solve the SOL concern practically.

BPA should consider a waiver for those plants that are not continuously staffed and have ramp restrictions that preclude them from complying.

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