

Seattle City Light's Comments on CAISO's 2018-2019 Transmission Planning Process—
Draft Special Study Scopes
April 25, 2018

Seattle City Light (City Light) appreciates the opportunity to comment on the 2018-2019 Transmission Planning Process (TPP). City Light owns and operates resources with approximately 2,000 MW of carbon-free hydroelectric capacity and owns 160MW of capacity on Bonneville Power Administration's (BPA) share of the Northwest AC Intertie (NWACI). City Light is the tenth-largest consumer owned electric utility in the nation, providing electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. City Light executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Energy Imbalance Market (EIM) in 2020. City Light is supportive of exploring options to increase the transfer capabilities between the Pacific Northwest and California on the NWACI and the PDCI to allow for the more efficient dispatch of carbon-free resources throughout the west.

The capacity and costs of the NWACI are shared among a number of entities in a complex contractual arrangement of asset owners and capacity owners, representing both jurisdictional and non-jurisdictional entities. City Light is one of several entities that owns capacity rights on BPA's share of the NWACI. We echo comments previously provided by BPA stating that any studies addressing capabilities of the COI and the NWACI require coordination not only with BPA, but also the other NWACI asset owners and BPA's capacity owners.

Thank you for this opportunity to comment. Please contact Stefanie Johnson at (206) 386-4539 or stefanie.johnson@seattle.gov for any questions or additional information regarding these comments.