

**From:** Richard Sargent [mailto:RSargent@franklinpud.com]  
**Sent:** Wednesday, March 16, 2016 9:49 AM  
**To:** Tech Forum  
**Cc:** Holly Dohrman; Randall Gregg (rgregg@teainc.org); Dmitry Batishchev  
**Subject:** BP-18 Rate Case Parking Lot Issues

As requested Franklin would like to submit two issues for the BP-16 Power and Transmission Rate Case issue list.

### **Short-Distance Discount (SDD)**

Currently under BPA Business Practices, if a PTP reservation that receives a SDD credit is redirected, for all or a portion of the capacity and for any period of time during a month, the customer loses the discount for the entire month in which the reservation was redirected. Under this practice, a utility loses 100% of its SDD credit when a redirect may only occur once in a month and for a single hour. The method of penalizing 100% of the credit for any occurrence is excessive and should be scaled or assessed to a level in relation to the level of the redirects.

### **Unauthorized Increase Charge (UIC) Rate Calculation pursuant to Section II.F.1.a. of the GRSP and UIC Relief Section II.F.3.a**

BPA PTP customers are assessed a UIC charge as defined in Section II.F.1.a. UIC penalties are appropriate however the rate at which they are calculated is excessive and does not represent a proper charge or cost to the system.

The GRSP Section II.F.3.a gives direction to BPA in issuing relief for waiving or reducing the UIC. These directions however are inflexible and stringent and do not allow the ability to permit for a fair reduction or waiver of UIC assessments for inadvertent/unintentional UAI's

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