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BC Hydro Power Authority
333 Dunsmuir St.
Vancouver, B.C., V6B 5R3

Sent via email

Dear Brenda Ambrosi:

Proposed Change to Counterflow

On April 30, 2021, BC Hydro Grid Operations ("BC Hydro") posted a BC Hydro Power Supply ("BCPS") request asking BC Hydro to modify its ATC Implementation Document and associated TTC/ATC Business Practice to allow for firm counterflow scheduling from BC to the U.S. based on the assured deliveries of the Canadian Entitlement.

BC Hydro requested feedback on the proposed change. TransAlta Energy Marketing Corporation's ("TEMCO") comments follow. TEMCO asks that our comments be taken as preliminary views on the proposal—we wish to review BC Hydro's submission on the proposed change before deciding on whether to support or oppose it.

1. TEMCO requests that BC Hydro post their feedback in a follow-up bulletin for stakeholders to consider. TEMCO is concerned that if new firm capacity is created as a result of this proposal, it should be made available in a nondiscriminatory manner and will not negatively impact the reliability of service sold today.
2. BCPS has asserted that the nature of the Canadian Entitlement is such that counterflows can be confidently offered and scheduled as firm. It is unclear whether BC Hydro agrees with that assessment. For example, is data available that demonstrates how scheduled Canadian Entitlement flows dependably in real-time enough to offer firm counterflow capacity (within some acceptable reliability metric)? Are there other aspects of the proposal that should be examined to confirm that other Transmission Customers will not be negatively impacted by the change?
3. The proposal does not address how firm counterflow capacity would be posted to ensure equitable access for all market participants. Can BC Hydro briefly explain how this change, if adopted, would be implemented in its system and result in an offering?

Yours truly,

TRANSALTA ENERGY MARKETING CORP.