

COMMENTS OF THE NETWORK CUSTOMER GROUP

Submitted June 22, 2018

These comments on the Bonneville Power Administration's ("BPA") proposed Open Access Transmission Tariff ("Tariff") terms and conditions are submitted on behalf of Eugene Water and Electric Board ("EWEB"), Northwest Requirements Utilities ("NRU"), PNGC Power, and Western Public Agencies Group ("WPAG") (collectively, the "Network Customer Group"). The Network Customer Group represents over 85 customers located in 8 states (OR, CA, WA, ID, MT, UT, WY, NV) that use BPA's Network Integration Transmission Service ("NT") to bring power to their respective loads and are dependent on BPA to provide the vast majority of their high-voltage transmission service.

Available Transfer Capability

The NT Customer Group appreciate BPA's presentation on ATC and are supportive of BPA exploring ways to make efficient use of its transmission system. With respect to Load Growth assumptions, we are supportive of BPA working closely with customers on load growth forecasts as part of the NT Dialogue Process to ensure that BPA is appropriately planning the system and enabling economic development in the region. We also support BPA's planning for network load growth in its calculation of Existing Transmission Commitments (ETC), consistent with BPA's obligations under its Open Access Transmission Tariff, including Section 28.3, which calls for the Transmission Provider to provide firm transmission service over its Transmission System to the Network Customer for the delivery of capacity and energy from its designated Network Resources to service its Network Loads.

We were initially concerned with language on page 38 of BPA Staff's presentation which stated that, "*BPA will attempt to model NT Resource forecasts along with NT forecasted load in the Planning ETC(s).*" However, at the May 31 workshop, Staff explained that there may be instances where the planning group does not have the most recent customer forecasts through no fault of their own. The NT Customer Group are also relieved to hear BPA Staff state that in these cases, ETC would be set aside for NT resource forecasts base on the best available information as it comes available.

We are very supportive of BPA Staff's comments that they will encumber capacity for NT Resource Forecasts based on the highest impact on each flowgate for all accepted NT forecasts. This will allow NT Customers to procure combinations of Designated Resources that make the most efficient use of BPA's Transmission System on a planning basis.

TC-20 Procedural Schedule

The most recent redlined OATT produced by BPA Staff contains a tremendous amount of sections that are incomplete and/or marked as under review. In addition, BPA recently released proposed guidelines for how it will make deviations from FERC *Pro-Forma*, but has not yet finalized these guidelines in light of customer feedback last month. In addition, BPA has yet to release a comprehensive set of changes it intends to make along with the proposed tariff language. Until BPA produces a final set of issues that it will address, along with proposed tariff language, it is difficult to comment on the appropriateness of the procedural schedule. That said, to the extent these outstanding issues are addressed, we generally support the alignment of the TC-20 and BP-20 RODs.