

**Programs in Review for FY 2008-09  
Draft Close-Out Letter of November 22, 2006**

**Comments of the Public Generating Pool, Northwest Requirements Utilities,  
PNGC Power, and the Public Power Council**

The Joint Customers noted above filed extensive comments on September 7, 2006, addressing several critical subjects: (1) improvements to customer involvement in capital planning; (2) improving third-party financing opportunities; (3) implications of third-party financing; (4) regional transmission planning, expansion, and maintenance practices; and (5) BPA's most recent depreciation study. The Joint Customers generally agreed with BPA's proposed program levels for Transmission Services, and in light of the proposed settlement in the TR-08 docket see no need to comment on the specific program levels in the draft close-out letter.

Since September 7, BPA has provided some additional information on the Schultz-Wautoma upgrade, which involved third-party financing. However, the other subjects raised in the September 7 comments have not been addressed. Thus, we are disappointed that BPA's response to our extensive comments on several issues consists of two sentences on page 5 of the draft close-out letter, which refer only to the capital review process, and which offer no details. Thus, we are resubmitting our comments of September 7, and ask that, in the final close-out letter, BPA specifically address the individual issues raised in those comments.

Thank you.