

Snohomish County PUD No 1
Comments on Connecting Variable Generating Resources to the Federal Columbia River
Transmission System (FCTRS)
January 14, 2009

Snohomish County PUD No 1 (PUD) wishes to express its general support for BPA's proposed intermittent-generation curtailment process for ensuring transmission reliability, but urges BPA to carefully attend to implementation details. We are concerned there will be unintended consequences for utilities with intermittent resources that serve load within the BPA Balancing Authority Area. These utilities could find themselves penalized for situations beyond their control.

Snohomish PUD is a Load Serving Entity that schedules power within the BPA Balancing Authority Area. By June 2009, the PUD will have contracts for over 220 MW of wind capacity in its power portfolio. Dispatch orders to curtail variable generation could cause the PUD to fall short of the energy necessary to serve its load and could result in both Energy Imbalance and Unauthorized Increase Charges. Currently, there are no actions that Snohomish PUD could take within-the-hour to mitigate such a curtailment. This consequence of the Business Practice needs careful consideration and discussion before implementation.