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September 8, 2005

Bonneville Power Administration  
Attn: Communications - DM-7  
P.O. Box 14428  
Portland, OR 97293-4428

Re: Public Comment Period - Decision Point 2.

Dear BPA:

By his letter of August 4, 2005, Chief Executive Officer Stephen Wright solicited input on the referenced project. The comments of the Wyoming Public Service Commission (Wyoming PSC) are set forth below. In summary, the Wyoming PSC supports the continuing development of GridWest and urges the Bonneville Power Administration likewise to support GridWest at Decision Point 2. It is the more sensible and workable approach to the operation of the electric transmission grid in the greater Northwest. We do not view the proposals of the Transmission Improvements Group (TIG) as a viable alternative.

**1. Initial observation.** As it is structured, TIG would not be at work directly in Wyoming. TIG has, however, the potential to have a substantial negative impact on our state if it prevents the further development of GridWest.

**2. A solution is possible.** The Northwest, and the West as a whole, must meet significant transmission-related challenges originating in the physical limitations of the grid and in its operation. We have seen, through our involvement with the Rocky Mountain Area Transmission Study (RMATS), CREPC, the GridWest process and otherwise, that these problems are not theoretical and will not be cured by inaction. They manifest themselves in the decentralized and inefficient operation of the system and in the system's very limited ability to cope with changing and increasing demands. We understand that doing nothing carries a substantial price which will not diminish over time. Worse, it is a price that will be paid by the people and businesses of the region. Collaborative operation of the grid as a coherent, fully-integrated entity, as envisioned by GridWest, is a crucial basis for a workable solution. In this light, the BPA's "one-utility" vision makes excellent sense. Increased efficiency and reliability are possible if this paradigm is implemented. The FERC's recent Declaratory Order and the particular provisions of the Energy Policy Act of 2005 regarding existing transmission rights in

the Northwest give assurance that rational planning such as that undertaken by GridWest can go forward without undue interference.

**3. A sufficient organization is needed.** To achieve these goals, grid governance must be strong enough and decisive enough to operate in a coordinated and timely manner. GridWest has been meticulously planned to be capable of operating the transmission system to meet the needs of the public while preserving the economic interests of transmission owners. It offers practical answers to questions of transmission planning and expansion, system operation, congestion management, system reliability, market monitoring, and other issues. GridWest's development to date has been the result of the work of a wide variety of stakeholders and reflects their emphasis on making the system accountable to its users -- the public. It offers a single entity providing for voluntary operational system control and is designed to allow operational and public interest decisions to be made efficiently and quickly. Reflecting the realities of the electricity marketplace, it has a governance structure which includes a broad base of stakeholders, safeguarded by an independent board.

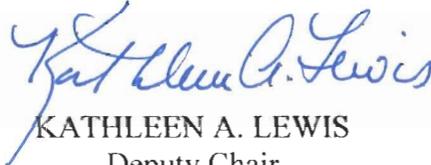
GridWest forms contractual relationships between itself and the various participating utilities, while TIG relies on a loosely related group of five separate agreements among multiple transmission providers themselves. While GridWest is designed to address the needs of the region in a consistent and open manner, TIG appears merely to produce a slightly more complex version of the status quo, keeping decision making in the hands of the utilities and inviting them to think narrowly and to act in their own self interest. GridWest offers an inclusive and sophisticated organization designed to serve the public, while TIG offers a cumbersome process which has not yet articulated a clear set of goals and which apparently seeks to preserve the dominant position of existing transmission owners.

**4. Conclusion: Our support for GridWest.** GridWest has demonstrated a continuing commitment to providing needed improvements in the operation of the transmission system in its footprint. It has been conscientious in its planning and conservative in estimating the value it is capable of adding to the transmission system in the Northwest. If GridWest continues to display these qualities, the Wyoming PSC will continue its support. To date, it has shown no intention to do otherwise; and we urge Bonneville Power Administration to support GridWest at Decision Point 2.

Sincerely,



STEVE FURTNEY  
Chairman



KATHLEEN A. LEWIS  
Deputy Chair



MARY BYRNES  
Commissioner

xc: Stephen Wright, Chief Executive Officer, Bonneville Power Administration