

2010 BPA Rate Case Transmission & Ancillary Services Customer Issues for Partial Settlement

**The following comments were submitted by
Iberdrola Renewables on December 3, 2008.**

Iberdrola Renewables (IBR) submits the following issues, questions and comments regarding BPA's partial transmission rate settlement proposal:

Incremental Rate Proposal:

- If BPA decides to establish a formula incremental rate, please describe the public process BPA is proposing to hold to establish the inputs for such a formula incremental rate, including the method(s) by which customers will have an opportunity to obtain information about and respond to BPA's proposed incremental rate inputs.

Procedural Questions:

- IBR understands BPA's 11/21/08 proposal to constitute a partial settlement of the 2010 BPA transmission rate case, and to exclude "issues associated with generation inputs." Please explain specifically what issues BPA considers to be the "issues associated with generation inputs".
- Please explain BPA's proposed process for resolving the "issues associated with generation inputs", including, specifically, under which BPA docket or dockets these issues will be determined.
- Please explain which "issues associated with generation inputs" will be determined by Power Services and which "issues associated with generation inputs" will be determined by Transmission Services.
- Please explain the interrelationship between the wind integration team meetings and BPA's proposed process for resolving technical and implementation issues associated with the wind integration charge.

Requests:

- IBR requests that BPA add the short-distance discount provision to the Southern Intertie rate schedule, as raised previously, to provide comparability and equity on this matter between the Network and Intertie.
- IBR requests that BPA proceed with the wind integration rate consistent with the Wind Integration Concept paper circulated by IBR on October 24, 2008.

Thank you,
Lara Skidmore

*Lara L. Skidmore
Troutman Sanders LLP
Ph: (OR) 503-590-2979
Ph: (DC) 202-274-2918
Cell: 503-459-7970
lara.skidmore@troutmansanders.com*