

*Sally*01-16-04A10:23 RCVD *mje***City of Seattle**

Gregory J. Nickels, Mayor

Seattle City Light

James Ritch, Acting Superintendent

January 13, 2004

This request was forwarded to Debra Smiley KDP-4 on 1/16/04 mje hu # 503-230-3084

Sally Long
 Transmission Account Executive
 Transmission Marketing & Sales, TM-OPP-2
 Bonneville Power Administration
 PO Box 61409
 Vancouver, WA 98666-1409

Subject: Freedom of Information Act Request

Dear Ms. Long:

RECEIVED BY BPA FOIA OFFICE THIS DATE: 01/21/04
DUE DATE: 2/19/04
LOG # 04-022

Seattle City Light (Seattle) staff met many times with BPA's Transmission Business Line (BPAT) representatives over the last few years to discuss the Puget Sound Area transmission congestion issues. Seattle and other Puget Sound area utilities are penalized inequitably for the return of the Canadian Entitlement energy due to curtailments that resulted from transmission congestion. To better understand the history and context of BPAT's decisions that led to this situation, we need to assess the technical review process conducted by BPAT prior to using the Northern Intertie to return this energy rather than build transmission lines to Oliver, B. C. as was provided in the Columbia Treaty.

Accordingly, in September 2003, Hardev Juj asked for a copy of the studies that demonstrated the Canadian Entitlement energy could be returned over the Northern Intertie. You responded that those studies were confidential information exchanged between the US and Canada, and you were unable to release them to Seattle.

Seattle does not believe that these documents can be held secret, especially from those utilities that are directly affected by BPAT's actions. Therefore, by this letter Seattle formally requests the information listed below under the federal Freedom of Information Act (FOIA).

Seattle requests that BPAT send us copies of the underlying information that constitutes the basis of the findings in the Final Environmental Impact Statement on Delivery of the Canadian Entitlement, January 1996, Document Number DOE/EIS-0197 (the "1996 FEIS"). Specifically, Seattle requests the documents, data, studies, power flow base cases in raw data format, draw files, list of contingencies used in the power flows, loads/resources of all Puget

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Sound utilities that were used in the power flows, tabulations of study results, stability runs and corresponding plots, graphs, assumptions, work papers and results that supported the following statements in the 1996 FEIS:

1. "Adequate existing south-to-north capacity exists on the BPA transmission system so that no additional transmission facility would be needed in the northern Puget Sound area to deliver the entire Entitlement amount (approximately 1,400 MW) to the Blaine point of delivery." (Section 2.2.1.1, Transmission Construction, Blaine Point of Delivery, 1996 FEIS, page 2-4);
2. "However, delivering the Entitlement at Blaine might require accelerating the construction date of a new 500-kV transmission line across the Cascade Mountains in Washington. This new line was identified as one possible contingency to meet Puget Sound loads if they grow faster than expected and if most new generation is located east of the Cascades. Delivering the Entitlement at Blaine would represent a new load in the Puget Sound area, and a cross-Cascades line might have to be built several years earlier than would otherwise be the case. This line would be either a new double-circuit 500-kV line or an upgrade of an existing 345-kV line to 500-kV double circuit." (Section 2.2.1.1, Transmission Construction, Blaine Point of Delivery, 1996 FEIS, page 2-5);
3. "Sufficient south-to-north transmission capacity exists in the northern Puget Sound area to deliver the full Entitlement to Blaine; however, additional transmission capacity across the Cascades would be needed sooner than BPA now plans to add it." (Section 4.1.1.3, Blaine Point of Delivery, 1996 FEIS, page 4-17);
4. "The Puget Sound EIS ~~evaluated several alternative strategies to correct existing peak~~ load reliability problems and to meet the projected growth in demand for electricity. A new cross-Cascades transmission line is one of the contingencies for the selected strategy." (Section 4.1.1.3, Blaine Point of Delivery, 1996 FEIS, page 4-17);
5. "If, however, the full Entitlement is delivered at Blaine, additional cross-Cascades 500-kV transmission line capacity would be required within a few years after the turn of the century, possibly as early as 2005. The exact date is very sensitive to different assumptions about load growth and the location of new generation; however, it is clear that delivering the full Entitlement at Blaine would require new transmission several years before it would otherwise be required." (Section 4.1.1.3, Blaine Point of Delivery, 1996 FEIS, page 4-17);



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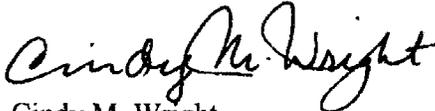
In addition, Seattle requests that BPAT provide a copy of the following document:

6. Puget Sound Area Electric Reliability Plan EIS (DOE, April 1992) cited in Section 4.1.1.3 (Blaine Point of Delivery) of the 1996 FEIS (page 4-17).

Please forward these materials to me (1) electronically to my email at cindy.wright@seattle.gov or (2) in hard copy (when appropriate) at Seattle City Light, 700 Fifth Avenue, STE 3300, Seattle, WA 98104-5031. We would appreciate receiving the base cases and computer modeling data stored on a compact diskette. Seattle is, of course, prepared to pay all appropriate copying costs and other fees provided for under FOIA.

If you have any questions, please contact me at (206) 386-4533.

Sincerely,



Cindy M. Wright
Manager of Wholesale Contracts
Seattle City Light

CW
cc: William Patton, Seattle Law Department



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