

**NRU Suggested Changes/Clarifications to the Final TRM
January 15, 2009**

Page 2, lines 10 and 11:

Reads:

“into which all line items on the Revenue Requirement Table are divided (allocated), address treatment of costs to be recovered.” This is unclear.

Perhaps should read:

“on which all line items on the Revenue Requirement Table are itemized and treatment of costs to be recovered is addressed.”

Page 29 lines 18 and 19:

“The **RHWM** is set by BPA in the RHWM Process prior to each 7(i) Process and defines a Public’s maximum eligibility to purchase at Tier 1 Rates for that Rate Period, limited by the ... Actual Net Requirement for Load Following customers.”

This is inconsistent with **Page 43 lines 13 and 14**: “The RHWM sets the maximum planned amount of power that a customer may purchase each year of the Rate Period under Tier 1 Rates, subject to its Annual Net Requirement.” Emphasis added.

Should Page 43, lines 13 and 14 read (?): “The RHWM sets the maximum planned amount of power that a customer may purchase each year of the Rate Period under Tier 1 Rates, subject to its Annual Net Requirement for Slice/Block customers and Actual Net Requirement for Load Following customers.”

Page 45, line 1:

“A public comment period and publicly noticed meeting will follow publication of the RHWMs”

Shouldn’t there be a specified length to the comment period? E.g., “at least 10 business days”?

Page 45, lines 17 and 18:

“Amounts less than 8,760 MWh may be served with Non-Federal Resources, consistent with the notice provisions of the CHWM Contract.”

Section 9.1 of the CHWM contract needs to be clarified to allow for this. Right now the contract only allows for amounts less than 8,760 MWH to be served with federal power, and the contract should be conformed to the TRM to prevent confusion.

Page 77, line 1: mentions PURPA resource.

Should this language include all federal, state (and local) resources mandated for acquisition, as well as “PURPA” resources?

Language could read: “In addition, PURPA or other federal, state, and local mandate, may require a customer to take a [...]”

Page 78, line 11 and page 80, line 3:

What is the definition of a “qualifying resource” for RSS purposes? Does this mean “Specified Resource”?

Page 81, lines 3 to 5:

Delete the following text as indicated from this TRM language:

“A resource that is contractually committed to be flat within each Monthly/Diurnal period of the year but not flat between those periods ~~will avoid the DFS charge but~~ will be subject to the Resource Shaping Charge. A resource that is contractually committed to be flat annually will avoid ~~both the DFS charge and~~ the Resource Shaping Charge”.

Reason: DFS is not applied to unspecified resources, but the Resource Shaping Charge is applicable to unspecified resources. The current language is confusing.

Page 81, line 25:

The word “charge” should be “credit” in both instances.