

NIPPC Comments on BPA Proposed Business Practice related to Requesting Transmission Service V.48

The Northwest & Intermountain Power Producers Coalition submits the following comments in response to the BPA proposed changes to the Requesting Transmission Service Business Practice. The Northwest & Intermountain Power Producers Coalition (“NIPPC”) is a membership-based advocacy group representing] competitive electricity market participants in the Pacific Northwest and Intermountain region. NIPPC has a diverse membership including independent power producers and developers, electricity service suppliers, transmission companies, marketers, storage providers, and others. Most of NIPPC’s members are transmission customers of BPA and will be impacted by this business practice.

Comments

NIPPC members generally support the proposed changes. While there were initial concerns about the proposed increase in the processing fee, based on the representations by BPA staff that \$10,000 represents the actual cost of processing customers’ requests for transmission service, NIPPC does not object to the increase in the non-refundable processing fee. NIPPC agrees that the costs of processing a customer’s request for transmission service should be borne by the customer making the request and not recovered from existing transmission customers through BPA’s rates.

Section F.3.

NIPPC has no objection to a requirement that customers provide BPA with information using the current data exhibit form. We do suggest, however, that BPA include a cross-reference to the location of the “current” data exhibit form and specify the effective date of the “current” version of the data exhibit form in the business practice. Alternatively, BPA could attach the current data exhibit form to the business practice as an appendix.

Thank you for the opportunity to provide these comments.