

August 19, 2014



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To whom it may concern:

On August 13, 2014, BPA held a BP-16 Power and Transmission Workshop. At this meeting, BPA requested comments from customers regarding the Southern Intertie Long Term Firm Value topic be provided by Wednesday, August 20. This submittal is from four of the Public Utility Districts that are directly affected by changes to this topic. The four PUDs were recently awarded a share of the Southern Intertie through Portland General Electric's Open Season process. We appreciate the opportunity to comment and provide the following feedback on behalf of the four PUDs.

Our initial, coordinated comments are as follows:

- The Districts are asking to extend the comment period so that all participants have sufficient time to research the issue and prepare comments.
- The Districts support further analysis on the voiced regional value shift concerns raised at BP-16 Rates Workshop.
- The Districts support customer requests for BPA to apply resources and help customers form an educated opinion on a regional value shift.
  - There appears to be seams issues from business practice induced systemic disconnects between CAISO MRTU scheduling practices and Northwest scheduling practices that requires additional research.
- The Districts support BPA setting up future customer meeting(s) to understand what BPA and other regional entities have learned. We also request that along with future customer meetings we continue these discussions within rate workshops.

The main reasons for further analysis and regional dialogue are as follows:

- The Districts have concerns as PBL preference customers that PBL revenues are being adversely impacted by this regional value shift.
- The Districts have concerns as TBL transmission customers that the regional value shift may have unintended long term adverse impacts on the value of existing firm BPA Intertie rights.

Thank you for the opportunity to comment on this important matter.

Sincerely,

Cowlitz County Public Utility District  
Franklin County Public Utility District  
Klickitat County Public Utility District  
Lewis County Public Utility District