



Commissioners

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*Chief Executive Officer/
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Wayne W. Nelson

February 12, 2014

Elliot Mainzer, Administrator
Bonneville Power Administration
PO Box 3621
Portland, OR 97208

(submitted via e-mail to techforum@bpa.gov)

RE: Transmission Segmentation Discussion – Proposed Segmentation Principles

Dear Elliot:

On behalf of Clark Public Utilities (Clark) I appreciate the opportunity to provide you with comments on the proposed workshops slated to discuss BPA's Transmission Segmentation policy and related principles. I appreciate you hosting the meeting on January 28, 2014, to discuss this topic.

Clark supports the analysis and conclusions reached in the BP 14 Record of Decision on the issue of Segmentation. Over the past 75 years BPA has planned the transmission system to meet the needs of the region consistent with its statutory obligation to ensure the widest possible use of the system. In doing so BPA has provided a great service to the entire region. Both urban and rural utilities and communities throughout the Northwest have benefited from BPA's Segmentation and uniform rate methodologies. To change methodology now would unnecessarily divide public power, and also the region as a whole, into winners and losers. BPA's existing Segmentation methodology is equitable, consistent with cost causation, and meets BPA's statutory obligations. Clark is not convinced that a compelling reason exists to revise BPA's Segmentation methodology at this time.

We look forward to the upcoming workshops on this topic and support the principles laid out by BPA staff in the January 28, 2014, meeting.

Sincerely,

A handwritten signature in red ink, appearing to read "Pat McGary", is written over a red line.

Patrick R. McGary
Director of Energy Resources