

# **Customer Comments**

## **BP-16 Rate Case**

Comment Received from  
Iberdrola Renewables  
September 19, 2014



**From:** Beane, Laura [<mailto:Laura.Beane@iberdrolaren.com>]

**Sent:** Friday, September 19, 2014 4:15 PM

**To:** Tech Forum

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**Subject:** Iberdrola Comments on Southern Intertie Issues

Iberdrola Renewables appreciates the opportunity to comment regarding the Southern Intertie issues raised during the BP-16 rate workshops. Iberdrola Renewables agrees a seams issue exists which has impacted the firm transmission rights holders on the Southern Intertie. Firm rights holders have made a significant investment and the loss of value is of concern. Numerous options have been proposed to address this issue. Iberdrola Renewables is concerned that some proposed solutions may create unintended consequences or precedent that could be detrimental in the future. However, Iberdrola would like the opportunity to further explore the proposal to eliminate the 10:00 p.m. release of unused capacity as non-firm transmission on Bonneville's system and, instead, require firm rights holders to remarket any unused transmission. Bonneville could create this requirement via Business Practice and make clear that unused transmission that was not offered by firm rights holders by a designated time would be automatically posted at Bonneville's tariff rate cap. This would help to ensure transmission capacity was fully utilized while properly compensating long-term firm rights holders for their investment. Iberdrola Renewables believes Bonneville should initiate a stakeholder process to further explore this, as well as other, potential solutions.



**Laura Beane**

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