



Your Northwest renewables utility

August 6, 2014

Submitted via email to: techforum@bpa.gov

Tech Forum
Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

Re: Proposed Revisions to BPA Direct Assignment Policy

Snohomish appreciates the opportunity to provide comments on BPA's Direct Assignment Policy. As new transmission facilities become necessary, it is important for BPA to have a robust and transparent process for determining how these new projects will be classified. Snohomish offers the following for consideration.

In the Segmentation process, Snohomish requested that BPA re-examine its Direct Assignment Policy, specifically to create a durable and consistent methodology for evaluating new projects. Snohomish has attached a redlined version of the BPA Policy. The proposed edits are intended to provide clarification on which facilities are subject to Direct Assignment and which would be included in the integrated network. Snohomish's suggestions include:

- **Removal of the 34.5 kV brightline.** Going forward, proposed facilities should be evaluated on their merits without a kV threshold requirement.
- **Impact to Bulk Electric System.** Another factor that should be considered in determining whether the costs of a facility should be directly assigned is whether the facility would impact the Bulk Electric System.
- **Clarifications.** Several terms, such as "short radial loop" have been edited for clarity.

In addition to changes made to the Policy, Snohomish requests a review process where proposed projects and their classifications are discussed to help ensure consistent application of the Direct

Assignment Policy. The Transmission Customer Forum may be an appropriate venue to summarize recent Direct Assignment evaluations.

Snohomish reiterates that the revised policy should apply prospectively – classification of existing facilities would be unaffected. The proposed changes are intended to solidify the methodology for Direct Assignment and provide clear guidelines for classifying new transmission facilities.

Please do not hesitate to contact us if you have any questions.

Sincerely,



Craig W. Collar
Assistant General Manager
Power, Rates and Transmission Management
Snohomish County PUD No. 1

Attachment: BPA Direct Assignment Policy – Snohomish Redline 5-6-14.doc