



*Your Northwest renewables utility*

December 4, 2015

Submitted via email: [refredrickson@bpa.gov](mailto:refredrickson@bpa.gov)

Bonneville Power Administration  
905 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

Re: Comments of Snohomish County PUD No. 1 on the BPA Southern Intertie Hourly Non-Firm White Paper

Dear Ms. Fredrickson;

Snohomish County PUD No. 1 (Snohomish) appreciates the opportunity to provide feedback to BPA on the draft White Paper, as well as the Southern Intertie Hourly Non-firm process to date. As a BPA customer and an owner of Third AC capacity, Snohomish is invested in preserving the value of the Southern Intertie for long term rights holders.

After reviewing the draft White Paper, Snohomish believes there is sufficient detail in the Background sections, and that the White Paper properly characterizes the history of this issue. Additionally, the description of each option seems to accurately summarize the proposed action.

In the draft White Paper, BPA describes the three seams issues currently faced by the region, as well as the scope of issues to be considered as part of this process. BPA is limiting the scope of this process to the seams issue of the priority of hourly non-firm in the CAISO being equivalent to long term firm. This excludes the issues concerning curtailment responsibility between BAs and the assignment of scheduling rights during de-rates. Snohomish is concerned with the exclusion of these seams issues, as each contributes to the loss of customer value on the Southern Intertie. BPA states that these topics will be discussed in other forums; Snohomish requests that BPA explicitly state which processes are being considered to address these seams issues and provide a timeline for future action.

Snohomish County PUD #1

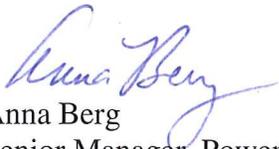
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Snohomish would also like to reaffirm its support for BPA considering both rate and non-rate solutions to the loss of long term firm value. Depending on the final results of BPA's analysis, it makes sense to implement a short term rate solution to recapture some of the lost value while studying and implementing a non-rates solution to close the underlying seams issue permanently. These actions can be taken in tandem with a collaborative effort with the CAISO.

If BPA has any questions about these comments, please do not hesitate to contact us. Snohomish looks forward to continuing this process and reviewing the results of BPA's analysis in the final White Paper.

Sincerely,

A handwritten signature in blue ink that reads "Anna Berg". The signature is written in a cursive style with a long, sweeping underline.

Anna Berg  
Senior Manager, Power Supply