

**Comments of Avangrid Renewables, LLC on  
Error Correction Process Straw Proposal  
May 12, 2016**

Avangrid Renewables, LLC appreciates the opportunity to provide comments on the straw proposal to develop an Error Correction Process, presented by Snohomish PUD at the May 6<sup>th</sup> BP-18 Transmission Workshop. As Snohomish states, Bonneville currently does not have an established policy or consistent process by which to address mathematical errors discovered during a rate period. This has resulted in different and inconsistent treatment of errors and makes it difficult for customers to understand how Bonneville makes the determination that an error will be corrected or if it will not.

Avangrid Renewables generally supports the proposal which would establish criteria, scope and a method that Bonneville should use to guide its actions when errors are discovered. Avangrid thinks it prudent and timely to develop the policy through the BP-18 workshop process. Additionally, the error correction methodology should be based on a percentage of revenue requirement, which would ensure fair treatment of both Power and Transmission customers. Further, any attempt at error correction should be limited to errors occurring within the current rate period. BPA should avoid making retroactive corrections to errors occurring in prior rate periods.

Avangrid Renewables looks forward to working with Snohomish, Bonneville and it's other customers to develop a policy that will help guide the handling of errors that might occur during the rate making process.