

October 7, 2015

Submitted via email to Rebecca Fredrickson at BPA

RE: NRU Comments on BPA Transmission Southern Intertie Hourly Non-Firm Workshops

Dear Rebecca,

Northwest Requirements Utilities (NRU) is a trade association that represents the interests of 54 Load Following customers of BPA who also hold Network Transmission (NT) service contracts. Maintaining a reliable, cost-effective power and transmission system is of utmost importance to our membership.

NRU supports the process BPA has initiated to explore possible solutions to address the devaluation of the Southern Intertie long-term firm transmission rights. It is important to preserve the value of BPA's long-term transmission assets and ensure equitable recovery of costs from users of those assets. Central to this is preserving the value of long-term, firm transmission service on the Southern Intertie, relative to lower valued transmission services (such as hourly non-firm).

NRU supports BPA's efforts to ensure its ability to continue to receive predictable, stable revenues from Southern Intertie customers that fully recover the costs of that segment.

NRU supports BPA's efforts to explore rates and non-rates options, including collaborative solutions, in a timely fashion. We recognize that some solutions may be implementable on a quicker timeframe than others, and appreciate that this process can accommodate such flexibility.

NRU supports BPA's proposed draft principles on "rate criteria" and "non-rate criteria" listed on pages 9 and 10 of BPA's September 29, 2015 workshop handout. We do not support expanding BPA's principles to include generic references to FERC approved Open Access principles or consideration of the EPA's Clean Power Plan. BPA should consider and ultimately adopt solutions based on its statutory rights and obligations, including its rate directives.

We will remain engaged in this process in the forthcoming months and will continue to submit comments as these discussions evolve.

Thank you for this opportunity to comment. Please let me know if you have any questions.

/s/ Megan Stratman

Megan Stratman