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December 5, 2013

Department of Energy
Bonneville Power Administration
Transmission Services
P.O. Box 64109
Vancouver, WA 98666-1409

Via Email: techforum@bpa.gov

Re: Comments of Puget Sound Energy, Inc. on 2013 NOS Public Meeting

Puget Sound Energy, Inc (“PSE”) would like to thank The Bonneville Power Administration (“BPA”) for the opportunity to comment on BPA’s 2013 Network Open Season Public Meeting.

Regarding BPA’s future cluster study financial policy, PSE does not agree with the proposed financial requirements for the 2014 NOS. PSE regards the NOS as an important input to its plan of service to future load and generation development. While we understand that the intent of this change is to mitigate BPA’s financial risk associated with loss of MWs included in the NOS study, it can place an undue burden on a load serving entity to carry such significant costs for an extended period of time. BPA should recognize the inherent uncertainty of forecasting load and generation levels and locations. A low cost to enter the NOS allows time for customers to consider whether or not to continue as the level of uncertainty unfolds. Additional payments later on are therefore appropriate for those parties that have chosen to remain in the process.

PSE appreciates BPA's consideration of the recommendations contained herein. By return e-mail, please confirm BPA's receipt of these comments.

Very truly yours,

Puget Sound Energy, Inc.

By  _____

Title _____ Theresa M. Burch
Manager
Energy Delivery
Puget Sound Energy, Inc