

**JOINT COMMENTS OF THE NT CUSTOMER GROUP
REGARDING BPA NT BUSINESS PRACTICE**

These comments and attached redline document are respectfully submitted to the Bonneville Power Administration (“BPA”) on behalf of Northwest Requirements Utilities, PNGC Power, Western Public Agencies Group, and Clatskanie PUD (collectively, the “NT Customer Group”) regarding BPA’s draft Network Integration Transmission Service (NT) Business Practice. The NT Customer Group represent over half of all of BPA’s NT customers of whom rely heavily on the guidance provided by BPA’s NT Business Practice.

Due to the unusually large volume of questions and proposed modifications that we propose in the attached redline document, we do not believe the current Business Practice schedule will provide the necessary dialogue that we believe is required to adequately address our wide-ranging concerns. We strongly propose that BPA withdraw the draft NT Business Practice under section 4.3 of Bonneville’s Business Practice Process, and instead present the draft in a Network Operating Committee for further discussions between BPA and its NT customers.