



Transmission Services

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# **Customer Comments on Short-Term Competition for Transmission Rights**

Comment Received from  
Cowlitz County PUD  
March 30, 2012

Posted April 5, 2012

To: BPA Tech Forum

Date: March 30, 2012

RE: Short Term Preemption & Competition for Transmission Rights

Cowlitz PUD provides these comments in response to the materials and discussion presented at the March 1, 2012 customer workshop on Short Term Preemption & Competition for Transmission Rights associated with implementation of Section 13.2 (Reservation Priority) in its Open Access Transmission Tariff (OATT). Cowlitz appreciates BPAT's challenge in providing reliable transmission service to customers while trying to conform its OATT to FERC and industry standard business practices. However, implementation of Short Term Preemption & Competition in its proposed form may have serious unintended consequences that can adversely impact current hour-ahead, as well as day-ahead scheduling processes, create reliability issues, result in significant transmission cost increase risks for both Point to Point Customers as well as BPA's native load NT Customers, impair the transmission resale market, and in general result in additional costs to a significant number of BPA's native load customers. Given that BPA currently provides efficient and reliable transmission service to its customers under its flow gate-based system, and further, given that our understanding of the proposal seems to indicate considerable risks to Load Serving Entities, such as Cowlitz, which there appear to be no commensurate potential benefit to balance against, Cowlitz asks that BPA reexamine its decision to implement Short Term Preemption & Competition until all costs and benefits are thoroughly analyzed.