



Transmission Services

Subject: Customer Comments on the 2009 Network Open Season Precedent Transmission Service Agreement (PTSA)

Customer: Avista Utilities

Received: May 8, 2009

Comments to Proposed 2009 PTSA Language contained in Section 5(a)(2) and Exhibit B.

The referenced language requires the customer to provide resource and load specific locations. Hydro is the predominant resource in the Northwest. As BPA is well aware, new and existing resources are optimized in conjunction with hourly, daily and seasonal hydro conditions, including non-power flow requirements. Resources are dispatched hourly based on load conditions, hydro conditions, fuel cost, etc. Many utilities in the northwest that purchase transmission through BPA make system sales that originate from a number of existing resources. It is impractical to expect customers to pinpoint the locations as it appears is required in the proposed language. Resources in the Northwest simply are not dispatched in the manner implied.

BPA's need for load and resource location within the BPA Balancing Area is recognized as necessary in BPA's transmission planning studies. However, the Northwest transmission system is operated beyond BPA boundaries and incorporates many other utilities transmission systems. Many of the loads served by utilizing BPA's transmission are located on other parties systems that sell transmission under a contract path methodology. The point of delivery leaving BPA's system may not represent a specific substation and may be a combination of many physical points.

It would be practical for BPA to require the customer to provide a best estimate of the load and resource location, and clearly state such location is not binding.

Thank you for the opportunity to comment.