

To: BPA Tech Forum

From: Blake Weathers

Re: BPA's Proposed Partial Long-Term Firm Business Practice, Version 8

Date: July 8, 2014

Via: email techforum@bpa.gov

Northwest Requirements Utilities ("NRU") is a non-profit trade association of 54 public utilities that rely upon BPA as their primary or exclusive supplier of wholesale power and transmission services. NRU's members are all BPA Network Integration Transmission ("NT") Service customers. NRU appreciates the opportunity to comment on the Bonneville Power Administration's ("BPA") proposed Partial Long-Term Firm Business Practice, Version 8. We submit the following comments specifically regarding section B.1, Table A and B.

NRU appreciates BPA's efforts to reduce the minimum number of consecutive months where an offer of Partial Service may be granted. That said, we disagree with the proposed restriction that ATC or Conditional Firm Inventory (CFI) must be available for at least 6 consecutive months for an offer of Partial Service to be granted. We believe this requirement does not comport with the intent of the proposed changes to the Business Practice. In fact, this condition may be more restrictive for a Partial Offer that meets the Section 5 requirements in the existing Business Practice.

Rather, BPA should offer Partial Service to Long-Term Firm NT requests for any and all months where ATC or CFI is available, with no limit on number of months and no requirement for consecutive months as a condition of a counteroffer for partial service.

Thank you for the opportunity to comment on the proposed Business Practice.