

PNGC 7/8/2014



MEMORANDUM

To: BPA Transmission at techforum@bpa.gov
From: Aleka Scott
Date: July 8, 2014
RE: PNGC Comments on Partial LTF service, Version 8

PNGC would like to submit the following comments regarding Version 8 of BPA's Partial Long Term Firm business practice:

Our comment refers to Table A and Table B under section B.1.

In both tables the "Partial Term/Partial MW without ROFR" offer type states that the partial offer must be available for at least 6 consecutive months of the TSR's term.

PNGC would like to see BPA offer partial service for any available months, with no limit on number of months and no requirement for consecutive months as a condition of a counteroffer for partial service. As NT customers, our requests are only to serve load; our load is firm in ALL months. Having firm transmission for ANY month is better than having to use short term firm products, or ultimately, nonfirm transmission. BPA's business practices for NT should do all that they can to offer any firm service that is available when making a partial long term firm transmission counteroffer. There is no reason that a partial service offer in response to an attested-to NT TSR should be countered with any less than all months that are available, even if the months are not consecutive and even if it is only for one month. We strongly urge you to consider amending your partial offer business practice, **at least as it applies to NT TSRs**, with a removal of the 6 consecutive month limitation on counteroffers.

Thank you for your consideration.