

February 27th, 2015

To: BPA Tech Forum (delivered via email at techforum@bpa.gov)

RE: Scheduling and Requesting Transmission Service Business Practices

Renewable Northwest appreciates the opportunity to comment on the draft Business Practice revisions to Scheduling Transmission Service Version 17 and Requesting Transmission Service Version 24. Renewable Northwest supports these business practice revisions as it is our understanding that they will facilitate the ability of BPA to procure third-party balancing reserves well in advance of the identified need. This advanced procurement capability is critical for BPA to be able to maintain a high-quality low-cost balancing service, and is in the best interest of consumers, the environment, and the quality of life in the Northwest.

Given the structure of the FY 2016-17 Generation Inputs Settlement Agreement, it is critical that BPA has the ability to solicit and procure a healthy share of cost-effective balancing reserves in advance of the 2016 spring runoff. The proposed business practice revisions would provide BPA that capability. Renewable Northwest also appreciates BPA gaining experience with advanced solicitations and purchases of cost-effective balancing reserves as soon as possible, ideally in preparation for the 2015 spring period. This low-cost trial run would simply test the capability and prime the market for fiscal year 2016 and beyond.

As BPA moves forward with its acquisition strategy, Renewable Northwest urges BPA to maintain a high degree of transparency and provide frequent opportunities for public input.

Renewable Northwest appreciates BPA's attention to these issues and the efforts to date to facilitate more advanced purchases of third-party balancing reserves.

/s/

Cameron Yourkowski
Senior Policy Manager

3Degrees
American Wind Energy Association
Atkins
Blattner Energy
Bonneville Environmental
Foundation
Center for Energy Efficiency &
Renewable Technologies
Christenson Electric
Citizens' Utility Board of Oregon
Climate Solutions
Columbia Gorge
Community College
Community Renewable
Energy Association
DNV GL
EDF Renewable Energy
EDP Renewables
Environment Oregon
Environment Washington
Eurus Energy America
EverPower
FirstWind
GE Energy
Geothermal
Resources Council
Green Mountain Energy
HDR Engineering, Inc.
Iberdrola Renewables
Idaho Conservation League
K&L Gates
Kapla Law PLLC
MAP
Montana Environmental
Information Center
MontPIRG
Natural Capital Partners
Natural Resources
Defense Council
NextEra Energy Resources
Northwest Environmental
Business Council
Northwest SEED
NW Energy Coalition
OneEnergy Renewables
Oregon Solar Energy
Industries Association
Orion Renewable Energy
Group LLC
OSPIRG
Oregon Tech
Portland Energy
Conservation, Inc.
Principle Power
REC Silicon
RES America Developments
Solar Oregon
SolarCity
Stoel Rives, LLP
SunPower Corporation
SWCA Environmental Consultants
Tonkon Torp LLP
Vestas Americas
Warm Springs Power &
Water Enterprises
Washington Environmental Council
WashPIRG
Western Resource Advocates