



Eugene Water & Electric Board

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Submitted via e-mail to techforum@bpa.gov

RE: EWEB Comments on Network Integration (NT) Transmission Service Business Practice, Version 5

EWEB appreciates the opportunity to comment on the proposed revisions to BPA's Network Integration (NT) Transmission Service Business Practice, Version 5 ("NT Business Practice"). After reviewing the revised NT Business Practice (BP), we are very pleased to see BPA has included revisions that allow BPA to pursue the most accurate information in its planning. These proposed changes will help BPA meet its requirement under the tariff to provide firm transmission service to NT customers to serve NT from non federal resources in addition to the FCRPS. For specific comment, EWEB fully supports those submitted by Cowlitz in their comments submitted August 21, 2012.

In addition to offering our support and appreciation for the revised processes encompassed in the NT Business Practice, we urge BPA to continue working with NT customers to determine how upgrades or builds needed to meet NT customers' needs will be accommodated. Updating BPA's planning assumptions via forecast TSRs is an important step in the right direction but only half of the answer. The other half of the answer is how BPA, as the NT service provider, will provide service to NT customers when there is no ATC available and/or there is no subgrid capacity available. We look forward to continuing our work with BPA on these issues.

Thank you again for the work BPA has done to revise the NT Business Practice.

Megan Capper
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cc: Erin Erben, Manager of Power and Strategic Planning