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Sent: Sunday, August 19, 2012 3:59 PM
To: Tech Forum
Subject: BPA NT Planning Policies from Wells Rural Electric Company

WREC Comments on the proposed NT Business Practices

Wells Rural Electric Co. (WREC) appreciates the opportunity to comment on BPA's proposed revisions to its Network Integration ("NT") Transmission Service, Version 5, Business Practice ("NT Business Practice") and Impacts of Long Term Requests Available Transfer Capability ("ATC") Methodology, Version 10, document ("ATC Document").

Wells Rural Electric Co. (WREC) is a consumer owned distribution cooperative serving residential, commercial, irrigation and industrial customers in Northern Nevada. WREC's service area is approximately 12,000 square miles serving approximately 6,000 customers. WREC is a requirements customer of BPA and receives transmission service via a BPA NT contract and BPA GTA service through Idaho Power and NV Energy transmission systems. WREC is a member of Northwest Requirements Utilities (NRU) and a member of Northwest Energy Management Services (NEMS) for non-federal Tier 2 power.

BPA is proposing important positive changes to its NT transmission planning policies that reflect the new world of Regional Dialogue and use of non-federal resources with no detrimental impact to customers that continue to rely fully on the federal system. These changes represent significant progress on BPA's behalf and provide a framework that reflects Regional Dialogue's goal of using of non-federal resources to serve some A-RHWM load. As a member of NRU, WREC fully supports the comments submitted by NRU regarding the NT Business Practices.

WREC does feel there is still a need for BPA to develop a policy for building or upgrading the transmission system when capacity is not available to serve NT loads. Transmission upgrades can take a very long time to complete and must be planned for well in advance of NT loads. We urge BPA to continue working with NT customers to determine how transmission upgrades or builds needed to meet NT customer loads 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 insufficient ATC available and/or insufficient sub-grid capacity available. As a member of NRU, WREC looks forward to continuing working with BPA on these issues.

We wish to express our support and appreciation for the hard work that has gone into developing these revised documents by BPA and other customers. Adoption of these documents will certainly expedite one of the primary drivers of Regional Dialogue, that being the development of non-federal resources.

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