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From: Michael Raschio [<mailto:maraschio@comcast.net>]  
Sent: Friday, April 26, 2013 2:27 PM  
To: Tech Forum  
Subject: TSR Study Procedures Business Practice Comments

Folks

In regards to the BPA Transmission Service Request (TSR) Study Procedures Business Practice, I have the following comments:

1. Sink Designation

I am concerned about the PTP and NT Data Exhibit requirements, especially with providing the POR ultimate sink. I understand BPAs need to have this information to model the TSR correctly in either the Individual study or Cluster Study. However, most new projects and seeking transmission do not know who the ultimate sink will be. They will submit requests based on where they believe they may be able to get a PPA and will provide a possible sink at the POD requested.

The question that BPA does not answer in this BP is how BPA will evaluate the Data Exhibit, and the required information provided, and what meets BPA's requirements. Will BPA accept a Sink at a load Sink such as PGE, as an example, if that customer requesting the transmission does not have a PPA with PGE? I believe it has to accept the data as provided as a legitimate TSR under BPA's Tariff and FERC's Open Access Policy and provide a study agreement. The Data Exhibit should not be rejected and the TSR Declined for this type of condition.

The same holds for requests NW Hub and Mid-C that require a Second leg out of the NW Hub as part of the Data Exhibit. If a legitimate potential TSR or TSA is identified, BPA should accept this as meeting the requirements to proceed with issuing a study agreement. BPA should also look at matching TSRs that go into and out of the NW Hub as another option.

2. Cluster Restudy

BPA covers in this BP who pays the cost if a party drops out during the Cluster Study and a restudy is required. It does not cover who pays for a Restudy as a result of Parties not signing a PTSA or ESA. My understanding is BPA is proposing to cover those costs. These should be included in the BP.

Michael Raschio  
Elcon Associates, Inc  
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