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**Subject: TransAlta Comments on the TSR Study Procedures Business Practice and Data Exhibit**

TransAlta's comments on BPA's draft TSR Study Procedures Business Practice ("BP") are focused on Data Exhibits that would be required to accompany requests if the BP is implemented.

Generally, TransAlta agrees that customers should be provide as much detailed information as possible about the service being requested, such as source and sink, so BPA staff can study impacts as accurately as possible. The information is important for study purposes, but it cannot form the basis of removing the TSR from the queue and cannot be used to deny service.

**Alternate Solution**

For the reasons described below, TransAlta requests a global edit to the Transmission Service Request Data Exhibit as follows. In all instances that refer to missing required information, delete the text "shall result in the TSR being DECLINED" and replace with "shall result in a scoping meeting between the Customer and BPAT to establish appropriate study parameters for the TSR".

**Data Exhibit Impacts**

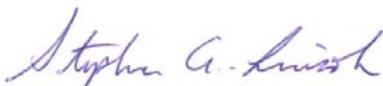
1. TransAlta echoes two concerns that that have already been described in earlier NOS Reform meetings and comments.
  - a. Transmission is purchased by customers who participate in energy markets and use the capacity with a variety sources and sinks that are not confirmed until day-ahead and real-time timeframes. This type of use has been fundamental to transmission service since the inception of Open Access and it will be denied if BPAT implements the Data Exhibit as proposed.
  - b. Denying TSRs that do not satisfactorily demonstrate the ultimate load will put many Point-to-Point customers in an untenable and paradoxical situation: A Power Purchase Agreement ("PPA") will be necessary to verify a TSR's sink, while at the same time successfully negotiating a PPA can and often does require *a studied or awarded TSR*. BPAT cannot implement a policy that

forces transmission customers into this contradictory position.

2. The provision of transmission service is based on the Points of Receipt and Delivery (“POR” and “POD”, respectively). These key parameters are not superseded by source or sink as Sections 1 and 2 of the proposed Data Exhibit implies. A TSR’s dependency on POR and POD, not source and sink, is highlighted in Section 22.2 of BPAT’s Open Access Transmission Tariff (“OATT”), where material changes—that require the customer to start over with a new TSR—are described as modifications to **POR** and **POD**.
3. TransAlta has serious concerns about the Data Exhibit’s references to “ultimate load” and BPAT’s validation process as described during the April 12, 2013 Cluster Study Eligibility Requirements meeting.
  - a. TransAlta contends that the validation process could involve confidentiality issues and conflicts of interest. For example, say the ultimate load is an industrial customer seeking direct access power. When validating Section 2.a. of the Data Exhibit, who is BPAT going to question about displaced generation, the entity that could lose a power customer? The proposed Data Exhibit validation process is flawed and must be corrected to prevent third parties from having any influence over a TSR’s fate.
  - b. In cases where the POD is an interface between BPAT and an adjacent Balancing Area Authority (“BAA”), BPAT is extending its responsibility to study system impacts beyond its own BAA.

TransAlta supports a requirement for customers to provide detailed information about how transmission capacity will be used, but the proposed Data Exhibit and consequences are not the way to get it.

Sincerely,



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Cc/  
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