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Transmission Customer Forum
Bonneville Power Administration
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Submitted electronically via techforum@bpa.gov

Northwest Requirements Utilities Comments on BPA's NT MOA

Northwest Requirements Utilities (NRU) provides the following comments on the May 10, 2011 draft of the Memorandum of Agreement (MOA) for the management of Network Integration Transmission (NT) Service between BPA Transmission and Power Services. All of NRU's members are NT customers of BPA and we appreciate the coordinated approach that BPA Power Services and Transmission Services have taken to serving our membership via the existing NT MOA.

The NT MOA is now being revised to reflect the term of the Regional Dialogue (RD) power sales contracts that go into effect on October 1, 2011. The RD power sales contract addresses service to both load and load growth under the Regional Dialogue Policy. We support having an NT MOA that provides transparency to the communication and coordination between BPA Power Services and Transmission Services that are necessary to provide load service to preference customers. Therefore, we support updating the NT MOA to reflect the new circumstances facing customers under the Regional Dialogue contracts and the approach taken in the draft NT MOA. The NT MOA is an appropriate and necessary framework for coordinating Transmission and Power Services' activities.

What is missing from this discussion is recognition of the new framework under Regional Dialogue where customers have a choice between using non-Federal and Federal resources to serve above rate period high water mark load. BPA Power and Transmission Services need to coordinate to align their policies and procedures, including their statutory obligations and authorities, with the Regional Dialogue Policy.

One of the fundamental premises of Regional Dialogue from a customer perspective was to have a viable and generally comparable opportunity to select between non-federal resources *or* BPA Tier 2 rates when serving above RHWM load. Without transmission access for NT load service, it will not be possible to achieve the goals of Regional Dialogue. Therefore, NRU strongly urges Power and Transmission Services to work with its NT customers to develop policies and methodologies to ensure real power supply choice is available to customers under Regional Dialogue. We look forward to working with the Agency and other customers in achieving this goal.

Respectfully,


John Saven, CEO