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REBUTTAL TESTIMONY OF

DENNIS E. METCALF AND SUSAN GARIFO FURST

Witnesses for Bonneville Power Administration

**SUBJECT: Rebuttal Testimony for Non-Federal Transmission Cost for GTA Customers’  
Non-Federal Power Purchases**

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6 **FOR GTA CUSTOMERS' NON-FEDERAL POWER PURCHASES**

7 **Section 1. Introduction and Purpose of Testimony**

8 *Q. Please state your names and qualifications.*

9 A. My name is Dennis E. Metcalf. My qualifications are contained in WP-02-Q-BPA-49.

10 A. My name is Susan Garifo Furst. My qualifications are contained in WP-02-Q-BPA-24.

11 *Q. Please state the purpose of your testimony.*

12 A. The purpose of this testimony is to rebut testimony from certain parties regarding the  
13 application of Bonneville Power Administration's (BPA) proposal for the payment for  
14 non-Federal transmission for non-Federal power to the South Idaho Exchange customers.

15 **Section 2. Response to Parties' Testimony**

16 *Q. Please summarize the parties' testimony regarding the inclusion of the South Idaho*  
17 *Exchange Customers in the payment for non-Federal transmission for non-Federal*  
18 *power.*

19 A. The Idaho Consumer-Owned Utilities Association (ICUA) proposes that BPA include  
20 the costs associated with the delivery of non-Federal power either through the South  
21 Idaho Exchange or a "functionally equivalent replacement" and eliminate the  
22 requirement that such deliveries come from the BPA network. Gendron,  
23 WP-02-E-ID-01, at 3. Northwest Requirements Utilities (NRU) and the Pacific  
24 Northwest Generating Cooperative (PNGC), both state that the South Idaho Exchange  
25 serves a similar function to General Transfer Agreements (GTA), and propose that the  
26 South Idaho Exchange mechanism be eligible for non-Federal power under BPA's

1 proposal. Saven, WP-02-E-NI-03, at 10 and Holt and Scott, WP-02-E-PN-01, at 6-7.

2 PNGC also proposes that BPA's criteria should be modified to eliminate the requirement  
3 that non-Federal power originate from the BPA system for those customers served  
4 through the South Idaho Exchange. Holt and Scott, WP-02-E-PN-01, at 7-8.

5 *Q. Are any modifications needed to BPA's proposal to allow the mechanism employed in  
6 the South Idaho Exchange to be eligible under the proposal?*

7 A. No. The only issue concerns whether PacifiCorp is able or willing to provide  
8 transmission from its western to its eastern system, either by allowing third party  
9 deliveries over the South Idaho Exchange or through the redispatch provisions in its  
10 Open Access Tariffs. The Transmission Business Line (TBL) takes no position on  
11 whether PacifiCorp can or should provide such service, but is willing to work with GTA  
12 customers and PacifiCorp in an attempt to reach such an arrangement. If GTA  
13 customers succeed in acquiring such service for non-Federal deliveries, then TBL would  
14 pay for that service subject to the conditions of the TBL proposal.

15 *Q. Both ICUA and PNGC propose that BPA should modify its proposal to eliminate the  
16 requirement that non-Federal power originate from the BPA system. Is that change  
17 necessary for the South Idaho Exchange customers to benefit from TBL's proposal for  
18 purchases made on the east side of the region?*

19 A. No. The Utah Power GTA provides for the delivery of power from Goshen Substation  
20 to the GTA customer, and the portion of Goshen Substation owned by BPA is in  
21 Bonneville's Network. Therefore, under the TBL proposal, TBL would pay for  
22 non-Federal transmission from Goshen to the GTA customers' Points of Delivery. The  
23 customer would be responsible for costs of delivering non-Federal power to Goshen. In  
24 other words, if the customer arranges for delivery of non-Federal power to Goshen, BPA  
25 will include the Network-equivalent costs of the non-Federal transmission from Goshen  
26 to the customer subject to the conditions of the TBL proposal.

1 Q. *Does this conclude your testimony?*

2 A. Yes.

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