

From: Ray Grinberg [mailto:Ray@penlight.org]
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To: Tech Forum
Subject: Cost Allocation Alternatives

Peninsula Light Company appreciates the opportunity to comment on the cost allocation methodologies presented at the Transmission Cost of Service Analysis (COSA) workshops. Peninsula uses Network Transmission (NT) to serve its 30,000 members in Pierce County, Washington.

Peninsula Light Company supports the position of NRU and other NT Customers and urges BPA to employ the 12 coincident peak cost allocation method in the COSA for the FY 2014-2015 transmission rate case. The 12 CP allocation method has long been prescribed by the Federal Energy Regulatory Commission (FERC). The 12 CP method clearly meets all of the FERC tests when applied to the load characteristics and planning criteria for the BPA Network segment. The 12 CP method will result in the equitable allocation of costs of the Network between federal and non-federal users of the transmission system as well as between the various transmission services involving use of the Network segment.

Thank you for considering these comments.

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