

**WESTERN MONTANA ELECTRIC
GENERATING & TRANSMISSION COOPERATIVE, INC.**

P.O. Box 1000 Missoula, MT 59806

September 28, 2012

Tech Forum
Bonneville Power Administration
911 NE 11th Ave.
Portland, Oregon 97232
techforum@bpa.gov

Re: BP14 Transmission Rate Case—Comments on Eastern Intertie Alternatives
[Submitted Electronically to techforum@bpa.gov]

Western Montana Electric Generating and Transmission Cooperative, Inc. (WMGT) offers the following comments on the alternative rate treatment options presented by BPA staff for the Eastern Intertie. At the September 12, 2012 rate workshop staff presented 3 alternatives: 1) Status quo with separate segments for the Eastern Intertie and Network, 2) Roll-in of the costs of the Montana Intertie rights and 3) Roll-in of the entire Eastern Intertie.

Subsequently at the September 27, 2012 workshop, BPA indicated that it would consider a recommendation to roll-in the costs of the Montana Intertie if there was consensus that roll-in of the Montana Intertie would not be a precedent for roll-in of the Southern Intertie.

WMGT does not support either roll-in alternative. In addition, the discussion at the September 12 rates workshop about development of some type of “non-precedential” language made it clear that many customers are skeptical that any sort of agreement or understanding could be developed. In addition, it is clear that there is no way to bind future customers and it is all but certain that other roll-in recommendations and/or advocacy could or would result from a decision to roll-in the Montana or Eastern Intertie.

Thank you for the opportunity to comment on the Eastern Intertie Roll-in Alternatives. Please feel free to contact me with any questions you may have about these comments.

Sincerely,

Joe Lukas
General Manager