



## CITY OF BONNERS FERRY

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### VIA EMAIL

Tech Forum  
Bonneville Power Administration  
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The City of Bonners Ferry feels it necessary to offer the following comments on the Integrated Network Segmentation Analysis presentation by Snohomish Public Utility District (“Snohomish”) at the Transmission Pre-Rate Case Workshop on August 22, 2012, which we understand was also supported by other PTP customer representatives. The City of Bonners Ferry has significant concerns about this proposal as we understand it. We fully support the comments submitted by NRU/PNGC/WPAG and therefore want to endorse those comments here but not repeat them.

At the distribution level we do not set electric rates based a segmented/directly assigned cost of the facilities to each individual residence. We follow the almost universal standard of setting rates so that they are fair by class of customer. As we understand Snohomish’s proposal, it would reject a rate setting methodology that has been used for years.

Further, it appears that the data in the presentation was extremely simplistic and failed to capture the reliability and load carrying capacity of loop feeds and distributed generation resources. In the Snohomish presentation, the Bonners Ferry Substation and the transmission loop sections on either side of this substation are identified as a load-serving network. The presentation neglected the fact that this is part of a loop feed and is integral with almost 50 MW of generation in north Idaho and western Montana owned by EWEB, Northern Lights, Inc, and the City of Bonners Ferry. It also fails to capture the fact that this substation has a large capacitor bank for system stability.

As shown with this one example of a single substation and two associated transmission segments, functionally assigning an accurate segmented cost would be extremely difficult if not impossible. Due to the complexity of the system, attempting to assign segmented cost would be fertile grounds for conflict.

For the reasons identified in the NRU/PNGC/WPAG comments and the above reasons, the City of Bonners Ferry urges Bonneville to reject the Snohomish proposal.

Thank you for the opportunity to comment on the Snohomish segmentation proposal. Please feel free to contact us with any questions you have about these comments.

Sincerely,

Stephen Boorman  
City Administrator