

Your Co-op
Flathead Electric
Community...Integrity...Reliability

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May 3, 2012

BPA Transmission Services
VIA EMAL: techforum@bpa.gov

Re: **Comments on Transmission Cost of Service Analysis Workshop Process**

Dear BPA Transmission Services:

Flathead would like to express our appreciation to BPA for its reasonable approach to meeting the terms of the Partial Transmission Settlement Agreement.

Flathead wholeheartedly supports the comments submitted by the NT coalition and would like to reiterate our individual support for BPA adopting a 12CP methodology in accordance with standard industry practice. In general, this may not be middle ground, but it is the right answer and we urge BPA to reconsider using a 12 Non-CP approach. BPA plans its system to meet twelve monthly coincident transmission peaks and the 12CP method for allocating costs between Network and PTP is appropriate.

Flathead also believes that as long as BPA uses the final proposed method from these workshops in its initial proposal that BPA has met its COSA obligations under the Partial Transmission Settlement Agreement.

Thank you for the opportunity to comment.

Sincerely,



Russ Schneider
Regulatory Analyst