

From: [Megan Stratman](#)
To: [Tech Forum](#)
Cc: [Roger Gray](#); [Betsy Bridge](#); [Blake Weathers](#); [Sybil Brown](#); [Megan Stratman](#)
Subject: BP-18 IS HNF
Date: Friday, May 06, 2016 12:29:38 PM

Hi Rebecca,

As NRU has stated previously, we support BPA Transmission working to ensure that the long-term value of the Southern Intertie is maintained, and appreciate the process BPA has held to discuss the issue and identify and test various solutions, specifically on the topic of the Southern Intertie (IS) Hourly Non Firm (HNF) rate.

In response to your request for comments at the April 20 workshop, NRU submits the following.

As described in the April 20 workshop materials, BPA staff proposes to modify the IS HNF rate to reflect the number of most valuable hours in the day. NRU supports this rate design.

BPA's analysis suggests that the most valuable hours in the day are when net load is the highest, which appears to be 4-6 hours of the evening peak. Because limited time was provided for us to conduct a robust analysis of data and potential impacts, we cannot specifically comment on this at this time, but we do support BPA's continued work on this issue and involvement of customers in future analysis. We look forward to future workshops as more data and analysis are shared to finalize the number of high value hours.

Additionally, BPA's staff leaning to use the same methodology for calculating IS Hourly Firm and HNF rates seems supportable to NRU.

Thank you for the opportunity comment.

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