



*Your Northwest renewables utility*

Submitted Via Tech Forum  
Bonneville Power Administration  
905 NE 11th Ave  
Portland, OR 97232

Subject: Comments on Franklin PUD's Short Distance Discount Proposal

Snohomish County PUD No. 1 ("Snohomish") appreciates the opportunity to provide feedback on the Franklin PUD ("Franklin") proposal regarding the Short Distance Discount ("SDD"). Snohomish understands Franklin's proposal to be in two parts:

- Part 1: Allow the SDD to apply when the Long-Term Firm reservation is redirected to a shorter duration yet firm transmission reservation, and maintains the same POR/POD combination.
- Part 2: If a portion of an SDD-eligible reservation is resold during a month, then the SDD would apply pro-rata for any hours not resold, rather than disqualifying the entire reservation.

Snohomish understands that under the status quo in either redirect or resale scenario described above, the SDD is lost for the entire month.

Snohomish fully supports Part 1 of Franklin's proposal to allow the SDD to apply to shorter duration requests that maintain the same POR/POD combination as its "SDD-eligible" long term parent reservation. The only changing variable seems to be the duration of the transmission service request, which still ties to the customer's long-term parent request. Customers eligible for the SDD would still be utilizing a transmission path that the SDD is designed to apply to, and therefore should continue to receive the benefit of the SDD. Enabling the SDD to be applied to shorter-term redirects with the same POR/POD combination facilitates scheduling efficiency at no cost to other customers or BPA.

Snohomish requests BPA study the cost of implementation for Part 2 of the Franklin proposal; allowing a pro-rata allocation of the SDD benefit. Snohomish agrees in principle that customers should be compensated pro-rata for their "SDD-eligible" firm transmission reservations, regardless of duration. Snohomish would like to better understand the cost and system requirements (if any) to implement Part 2 before it can formally support this part of the proposal.

Snohomish appreciates the thought and work Franklin PUD staff has invested in developing this issue for further regional discussion, and looks forward to the results of BPA's analysis.

Sincerely,

Ian Hunter  
Transmission Policy Analyst