BPA SOUTHERN INTERTIE HOURLY NONFIRM WORKSHOP PROCESS PUBLIC GENERATING POOL COMMENTS October 9, 2015

General Comments

- <u>BPA Power Involvement as Transmission Customer</u>. BPA preference customers are interested in understanding the impacts this issue has on the value of BPA Power's long-term firm rights on the Southern Intertie and BPA Power's perspective on other ideas contemplated and discussed in the stakeholder meetings.
- <u>Provide a timely remedy</u>. Given the financial impacts of this issue, we encourage BPA to implement a timely remedy to this issue. As indicated below, we believe implementing a short-term solution could provide for the ability to evaluate and implement an effective, long-term solution.

Statement of Issue

We would recommend that the current Issue Statement be modified to include the following objectives:

• To assure that long-term firm transmission rights holders are afforded the opportunity for an equitable sharing of congestion benefits between the Northwest parties and markets served by the Southern Intertie.

Alternatives for Consideration

PGP does not have any specific alternatives to recommend but offers the following thoughts on the category of alternatives that have been outlined so far:

- Given the time that may be involved in a collaborative solution and the uncertainty of results for other non-rate solutions, a rate solution may be the best solution in the near-term.
- A negotiated or collaborative solution has the potential to provide an effective, long-term solution. For this reason, we encourage BPA to put a solution in place that meets short-term needs (i.e. implement a rate solution) and be open to this alternative as a long-term solution.