

**PNGC's Comments
on BPA Proposed Metering Exhibit, April 29 Version
May 9, 2008**

First and foremost, revisions to metering exhibits must be by **mutual agreement**. Mutual agreement forces both parties to really verify the details of a metering exhibit. These are very complex exhibits with information needed from both parties. The points of delivery (PODs) define the primary quantity of the power sale. No change should be allowed to this fundamental part of the agreement without mutual written agreement.

1. BPA should consider having just one POD exhibit for both PS and TS. All the information needed for both PS and TS. Each business line would only use information it needed. Revisions to the exhibit would be prepared by one staff and attached to both the power and transmission contract at the same time. I foresee double the work and three-times the confusion if we have to prepare two different exhibits every time a POD needs updating. One common exhibit would insure that both our transmission bill and power bill are as accurate as possible and the exhibit is kept current.
2. If the previous one exhibit idea is rejected, BPA should recognize that there are reasons why the Transmission (TS) POD may need more information in them than the Power (PS) metering exhibits. For example, some TS exhibits specify reactive billing treatment while this information would not be needed for PS POD exhibits. Further, there are often special provisions dealing with UFT charges, special treatment of delivery charge, or other facility specific information needed for TS that would not impact PS billing.

Due to the work associated with updating POD exhibits, we would urge BPA not to require a wholesale revision of all existing TS POD exhibits to match PS exhibits.

2. ALL elements needed to accurately bill should be included in the POD exhibit; not just the critically important ones. The PS exhibit should note if each POM is subject to metering losses. This does not mean that the actual metering loss percentages need to be in the exhibit; loss factors are referenced now and this practice should continue. In our experience, whether or not POM losses apply creates more billing confusion than almost any other single meter attribute. The metering exhibit should be explicit about whether or not metering losses are needed at a POM.

3. While automation and standardization is a lofty goal, the reality of POD exhibits is much messier. It is important to note that automation may be possible but not standardization. There are too many one-off arrangements on the ground to hope for complete standardization. These

one-off arrangements may be able to be automated however. BPA should respect the complexity of the existing electrical system on the ground.

5. If BPA continues to want a separate and distinct POD exhibit for the power sales contract, it should not use any tables. Text versions like Format 1 are preferable. There is often quite lengthy and complex text in some of the areas that simply would not fit in the box format.

6. For clarity and ease of reference, BPA should include numbers on the points of metering (POM) since some POD have up to 5 or 6 POMs.

Thank you for this opportunity to comment.