

## **Snohomish PUD**

August 10, 2011

### **VIA EMAIL**

Tech Forum  
Bonneville Power Administration  
PO Box 491  
Vancouver, WA 98666  
[techforum@bpa.gov](mailto:techforum@bpa.gov)

**Re: Network Open Season and Generation Interconnection Reform Comments**

Dear Tech Forum,

Snohomish submits the following comments on the potential modifications to BPA's Network Open Season (NOS) and Generation Interconnection (GI) reform presented at the July 20th meeting. In addition to these comments Snohomish has filled out BPA's PTSA survey form and submitted that to the Tech Forum.

Snohomish appreciates that BPA is considering modifications to the NOS process going forward. BPA is in a unique situation. The number of Long Term Firm Transmission Service Requests (TSR) in BPA's queue is one of the largest in the country. Likewise, wind to load ratio is the largest in the U.S. And while the NOS 2008, 2009 and 2010 processes did clear the queues, the amount of wind on BPA's system continues to increase.

Because of the large amount of wind in BPA's Balancing Authority, historical planning methods are no longer working. Snohomish appreciates BPA planning engineer's work. Snohomish believes BPA needs to work with the region to define study assumptions behind the region load resource plan. The Wind Integration Study Team defined the percentage of time that a wind generator runs. Is BPA using the same one? Are the NTTG plans using a different number? Snohomish, for example, uses a different number for wind availability than BPA is using in its studies. BPA mentions a regional open season, but before BPA starts that or starts a NOS process again, we, as a region need to agree on the basic assumptions. Since BPA is a ColumbiaGrid (CG) member it should raise these issues at CG planning meetings.

Access to capital questions should be addressed in the upcoming Capital Investment meetings being held by BPA Finance Division.

The Generation Interconnection queue does require significant modifications and should be done jointly with the NOS process. There should be a process for allowing generation-ready projects to move up through the queue past projects that are not ready. Any such process, however, needs to be fair and not put other BPA customers at risk.

Snohomish PUD  
NOS-Generator Interconnection Reform Comments

Comment Received 8/10/2011

If you have any questions or comments please contact me at [lafinley@snopud.com](mailto:lafinley@snopud.com) .

Sincerely,

/s/

Linda A. Finley  
Sr. Regional Transmission Engineer