



June 29<sup>th</sup>, 2011

**VIA EMAIL**

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

Re: Comments on the NT Memorandum of Agreement

Dear Tech Forum,

PPC submits the following comments on the May 10<sup>th</sup>, 2011 draft of the Memorandum of Agreement for the Management of Network Integration Transmission Service for Delivery of Federal Power to Network Customer Loads (NT MOA). NT customers collectively face challenges for serving their load, including how customers will designate to BPA Power Services their respective secondary network service rights and in what manner BPA will deliver energy to NT Customers using those rights. Overall, PPC believes the NT MOA is a necessary agreement for the coordination between BPA Transmission Services (TS) and Power Services (PS) to deliver federal power to NT customer loads.<sup>1</sup>

*The NT MOA is appropriate for the service of NT Customers' Loads*

The NT MOA is a process, not policy, document intended to establish the procedures, terms and conditions under which BPA PS and TS will deliver power from Federal resources to NT Customers. In particular, NT customers as a group have assigned to BPA PS the right to reserve and schedule NT customers' secondary network service. As a result, BPA PS and TS need to agree on how those rights will be managed. Due to the number and diversity of NT customers, it is helpful that BPA address how they plan to serve NT customers as a group rather than individually. It is appropriate and convenient that there be an agreement between BPA PS and TS regarding NT service issues.

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<sup>1</sup> BPA published a document entitled "BPA Principles Relating to Planning, Operations and Commercial Practices Affecting the Federal Columbia River Power and Transmission Systems," which outlined principles used to develop the NT MOA. PPC chooses not to comment on the Principles document at this time. While these principles may have been used to develop the NT MOA, PPC views the NT MOA as a stand-alone document and not governed by the Principles document.



*The NT MOA does not violate BPA's Open Access Transmission Tariff (OATT)*

We understand some parties may be concerned that the NT MOA conflicts with the BPA OATT or with the description of NT service within the OATT. The Tariff does not prohibit customer groups and BPA from coming to an agreement regarding the procedures, terms and conditions through which NT customers will take OATT service. Moreover, BPA states within the NT MOA that the agreement will be consistent with the BPA Open Access Transmission Tariff.<sup>2</sup> There is no potential conflict with the BPA OATT that should prevent BPA PS and TS from coming to an agreement.

Thank you for this opportunity to comment.

Sincerely,

/s/

Kayce Spear  
Policy Analyst  
Nancy Baker  
Senior Policy Analyst

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<sup>2</sup> From section 1(a) of the NT MOA:

This Memorandum of Agreement (MOA) establishes the procedures, terms, and conditions between the Bonneville Power Administration (BPA) Power Services (PS) and BPA Transmission Services (TS) for the management of transmission arrangements needed to deliver power from Federal resources, including Federal purchases from non-Federally owned resources, designated in accordance with Exhibit A to this MOA by the TS Network Integration Transmission Service (NT or Network Service) customers identified in Exhibit B that take NT Service pursuant to Part III of the BPA Open Access Transmission Tariff (Tariff), as it may be revised from time to time. Such procedures, terms and conditions shall be consistent with the Tariff, including the methodology for designating Network Resources.