

# MEMORANDUM

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To: Techforum@bpa.gov  
From: Aleka Scott, PNGC's Vice-President of Transmission and Contracts  
Date: December 5, 2013  
RE: NOS Process Update Comments

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PNGC Power appreciates the opportunity to submit comments on the NOS Reform Process. These comments are in response to BPA's Nov. 18, 2013 presentation on NOS Process Update.

We suggest that BPA lessen the proposed 2014 Cluster Study Security Requirement to a lower multiple of months, such as one- or two-months, from the current six-month requirement. This will still impose a substantial security requirement and, combined with the Data Exhibit requirements should successfully produce a pool of serious requesters. With this modification to the cluster study security requirement, BPA should continue to implement the NOS Reforms it has proposed.

We believe that the cluster study funding method used in 2013, Pro-Rata share, is not sufficient to eliminate the speculative transmission requests. BPA should not use this process indefinitely, or even for the next round of NOS. Having a lower bar to get into the cluster study may make the cluster study results invalid if too many participants drop out when the next financial commitment is due. It is better to have a higher financial commitment at the front end of the cluster study, than jeopardize the integrity of the cluster study process. Further, BPA needs to have a robust NOS process in place should the market for renewable resources, and therefore for transmission requests, shift. Continuing with its proposed NOS reforms, as modified by our suggestion above, will allow BPA to study and answer the serious requests in a timely manner.

We appreciate this opportunity to comment and look forward to further engagement on NOS issues.