

Request for Comments – Response to BPA Questionnaire Key FERC Order 890 Reciprocity Issues

Filed by NIPPC, 1/15/10

The agency's request for customers to comment on Bonneville's willingness to comply with FERC Order 890 is commendable. So are the efforts BPA has taken in recent months to respond to operational challenges in the integration of wind power generation on its system.

The following response filed on behalf of the Northwest & Intermountain Power Producers Coalition (NIPPC) underscore our comments dated November 4, 2009 to which Bonneville has yet to respond.

NIPPC embraces the fundamental principle underlying federal policy that Transmission Owners (TOs) should provide their customers with services they require to conduct transactions and deliver power over a TOs' wires or, in the event that that's not possible, then to enable the customers to secure reasonable alternatives to achieve their commercial objectives. The first three topics BPA has laid out for comment are not of immediate concern to NIPPC or its members but that does not mean that BPA should dismiss them or use them to justify a surrender of safe harbor status and reciprocity. NIPPC encourages Bonneville to approach FERC to establish workable time lines that will implement these services to the extent BPA customers require them. A technical conference with FERC could be useful provided it is focused on collaboratively finding ways to allow BPA to comply with Order 890 -- rather than as a prelude to walking away from reciprocity under FERC's OATT.

In this light, the fourth question resembles the proverbial forest obscured by its trees.

NIPPC considers it vital that BPA maintain a reciprocal Tariff consistent with FERC policy. The agency's ability to collaborate with others TOs, accommodate IPPs developing resources within its balancing authority, and, most importantly, to prevent undue discrimination and preference in transmission service depends on Bonneville continuing to operate under FERC's OATT.

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