

**Conditional Firm
Customer Comments**

Posted: October 17, 2008

This document contains BPA Power Services' comments and Transmission Services' response to those comments on Conditional Firm.

Thank you for your comments.

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1 BPA Power Services

Power Services had a few comments stemming from the information provided at the September 22nd Customer Technical Forum. Our comments are specific to the topic of Condition Firm service.

Our first comment is that we feel BPAT should only look at 3 years of historical data when calculating the CF ATC. The reason we feel 3 years of data is the better representation (better than going back 4 years) is because it captures the flows of new generation on the system. It seems that the further you go back the further away you get changes in the topography of the system and there have been quite a few changes in the last 3 years in terms of new generation on the system and the addition of some new infrastructure.

Our second comment is that for the South of Allston flowgate, and all flowgates for that matter, BPAT should for the first round of offering CF ATC base the CF ATC on the 3% case not the 5% case. This would provide us with a level of comfort as this new service evolves by providing a limit to any unanticipated downsides of CF service.

Transmission Services' Response

Thank you for your attention to our development of the Conditional Firm transmission service product; we appreciate your comments.

BPA Transmission Services will continue to analyze how many years of data should be used for each flowgate when determining Conditional Firm ATC. However, we believe that unless there has been some fundamental change, such as the addition of substantial new generation or a change in system topology that impacts the flowgate, we should use as many years' worth of data as possible. If you believe that Conditional Firm capability for a specific flowgate should be examined using fewer years of data than what we are currently examining, please let us know what circumstances you believe we have overlooked.

We will incorporate your comments regarding South of Allston into the decision document. In addition, we will examine the impacts of recent offers on this flowgate.