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**Public Power Council**

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January 15, 2004

**VIA FACSIMILE**  
Stephen J. Wright  
Administrator  
Bonneville Power Administration  
911 N.E. 11<sup>th</sup> Avenue  
P.O. Box 3621  
Portland, Oregon 97208-3621

**Re: Proposed Tariff Compliance Filing Concerning Large Generator  
Interconnection Agreement and Procedures**

**Dear Steve:**

We understand that the Transmission Business Line proposes to adopt FERC's Order 2003 regarding large generator interconnections. The Public Power Council submitted comments to your staff expressing PPC's lack of support for this proposal. In its comments, PPC suggested that TBL should publish its draft proposal, take comments and provide a written decision, as required by the Administrative Procedures Act. PPC restates that suggestion here as a formal request.

A decision to comply substantially or partially with the Order 2003 would be a major policy decision. The implementation of all or portions of the final rule will appreciably shift costs, and amounts to a significant rate design issue. If BPA wishes to deviate from the final rule, it would be better to develop the record in support of the Administrator's decision in a hearing in the region, rather than rely on a FERC proceeding to do so. Leaving aside the substantive issues, these tariff modifications are, in effect, modifications of our members' service contracts.

While BPA may not be required to hold a hearing, the Administrative Procedures Act requires that the public have an adequate opportunity to comment on the proposed action. We believe that, at a minimum, BPA should publish its proposal, explain it fully, take comments on it and issue a written decision before implementation, either through a compliance filing or ad hoc, bilateral contracts.

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We conveyed these points to your staff in our comments. Staff posted on its website all of the comments that it received but has not indicated what it will do. We urge you to provide a satisfactory process even if it is only the minimum process that, we believe, is necessary. We look forward to your response.

Sincerely,



C. Clark Leone  
Manager

Cc: Nicole Case, Kanner & Associates  
John Saven, NRU  
Lon Peters, PGP  
Aleka Scott, PNGC  
Terry Mundorf, WPAG