



NTTG Order 1000 Stakeholder Comment and Input Form Your input on Northern Tier's processes are important to us. Please submit comments to info @ nttg.biz			NTTG Response All responses are dynamic and based upon assumptions that may be adjusted as options are fleshed out and alternatives considered; Unless otherwise indicated, responses are subject to change.			
Received via info @ nttg on May 15, 2012			NTTG Tracking Info Date Received: May 16, 2012 @ 1:18 PM (PST) Committee Assignment: NTTG O1K Cost Allocation Compliance Workgroup Date Assigned: May 16, 2012			
5/16/2012: Assigned to the NTTG Cost Allocation Compliance Workgroup						
Commentor Contact Information						
Date: May 15, 2012 Name: Vicki Baldwin Organization: UIEC						
Comments			DRAFT RESPONSE			
Source Document	Page / 1	Comment	ID#	Title	Response Date	Draft Response
n/a	n/a	With respect to cost allocation, it is our position that a postage stamp rate covering both PacifiCorp's eastern ("PACE") and western ("PACW") areas is not fair. There are clear delineations of the public policy issues between the two and the reliability issues. Similarly the net power cost reductions taken for transmission are treated differently in PACE than in PACW. Therefore, they should be separated for purposes of cost allocation.	57	UIEC #20	6.1.12	NTTG has not proposed or adopted a postage stamp regional cost allocation as part of its Order 1000 compliance efforts. Retail cost recovery mechanisms approved for use by the respective state commissions of PacifiCorp are not subject to the requirements of Order 1000, which addresses regional transmission cost allocation subject to jurisdiction by the Federal Energy Regulatory Commission ("FERC").
n/a	n/a	In allocating costs, there needs to be a clear method for allocating costs to non-investor-owned transmission entities and non-investor-owned generation entities that benefit from transmission projects. This should include, but not be limited to, assigning appropriate costs to wind generators for accessing the transmission system.	58	UIEC #21	6.1.12	Comment acknowledged. Guidance on this matter is provided in FERC Order 1000, P 760, and FERC Order 1000-A, P 680.