

Bob Lafferty and Marv Landauer

2. Need for more comparability for non-transmission solutions (See PP 479, 487, 494. The language negotiated by Marv and Bob Lafferty should be revisited to see if it meets these provisions. However, that level of detail might not need to be included in the strawman.)

PP494 requires that demand resources be considered on a comparable basis with generation.

PP 487 says that stakeholders should provide demand resources if they wish to have them considered in the development of the Transmission Plan.

PP 479 says that demand resources that could solve transmission problems and can be relied upon on a long term basis should be permitted to participate in the planning process on a comparable basis. A footnote to this section indicates that this was not intended to infringe upon state authority with regard to resource planning.

The PEFA process provides that:

- ColumbiaGrid will indicate which problem/needs could conceptually be solved with non-transmission solutions.
- All interested parties can participate in the transmission planning process
- Any party can make non-transmission proposals directly to the utility integrated resource planning (IRP) processes or to ColumbiaGrid (which ColumbiaGrid forwards to the utility).
- The utility IRP process is responsible to analyze non-transmission alternatives on a comparable basis, taking into consideration supply-side resources, demand-side resources, and transmission alternatives and to inform ColumbiaGrid of its determination.

We feel the PEFA process provides for appropriate participation and consideration of non-transmission alternatives on a comparable basis, consistent with state or other government jurisdictional responsibilities for integrated resource planning.