

**Grant County PUD Comments on
BPA's Proposed Short Term Firm Available Transfer Capability
Methodology - 4/16/04**

Below are Grant County PUD's comments regarding Short Term Firm ATC

1) If a request for STF transmission results in a *de minimis* impact on a flowgate, the request should be granted in all cases. This should apply for both requests to purchase STF transmission and firm redirects. To deny a request that has only a *de minimis* impact places an unacceptable limitation on STF transactions. *De minimis* impacts should continue to be defined as impacts on a flowgate of 10% of total request or 10MW, whichever is least.

2) STF transactions to meet native load in the Northwest should be given priority over transactions to move power to California.