

	Issue	Description	TPUD Position	Doris Mast Position	David Mast Position	Don Aufdermauer Position
	Compliance with OAR 860-025-0030 Filing Requirements	OAR 860-025-0005 requires that an application for a CPCN "comply with all other applicable Commission rules."	TPUD has satisfied this condition.			
	OAR 860-025-0030(1)(b): Information required to be in the Application under OAR 860-025-0005					
1 0	Detailed line description	Tillamook PUD's Transmission Line will be operated at 115 kV and will be sourced from an existing breaker in BPA's Tillamook Substation. The Transmission Line will run 8.6 miles from the Tillamook Substation and terminate at the new Oceanside Substation.	The Application includes a detailed line description.	Only the transmission line and 2 new feeders are described in detail. The return of 22 MW to Tillamook on a rebuilt feeder 51 is not described. Without a rebuilt feeder 51 the 33 additional MW that the transmission project is promising cannot be delivered. A detailed description of how the worst feeder in the system, incapable of being rebuilt to provide 11 MWs to coastal communities can be rebuilt to provide 22 MWs to Tillamook is necessary and has been omitted.		Line 51 would be rebuilt any way to handle the extra power coming back which is twice as much as its being used for now, our PUD is equiped to work on distribution line, transmission lines are a whole different ball game.
1 1	Purpose of proposed transmission line	The purpose is to adequately provide service to existing and new loads in a portion of Tillamook PUD's service territory, and to increase safety and reliability of TPUD's existing system.	The Application includes sufficient information describing the purpose of the line.		Option 3 does a better job of placing the capacity where it is needed - Option 3. is also safer because it does not go through forests.	TPUD has bought 4 transformers, that are bigger than present ones with upgrading line 51 and using Option 3 and with TCCA using propane. This gives TPUD more reliability, and accommodates for future load growth.
2 1.1	Necessity of proposed transmission line	The necessity is to increase reliability, accommodate load growth by adding system capacity, and address aging infrastructure. RELIABILITY "It will provide a new, more reliable source of power to the Netarts/Oceanside areas, will provide a connection to other power sources (normally open looped connection), and substantially reduce the number of customers involved in an outage and the length of the outage. LOAD GROWTH The Wilson River Substation is approaching its capacity due to load growth in the City of Tillamook, Bay City, and the communities of Netarts and Oceanside. AGING INFRASTRUCTURE Approximately two miles of the existing radial distribution line serving the Netarts, Oceanside, and Whiskey Creek Road areas consist of a double-circuit pole line that is more than 50 years old."	The Application includes sufficient information demonstrating the necessity of the line.	Reliability will increase for coastal communities but will decrease for Tillamook as 22 MWs of load for Tillamook is placed onto feeder 51. With the transmission project more people will suffer outages. Option 3 decreases outages in the coastal communities without shifting outages to Tillamook, a larger population area with several critical loads including hospital and medical facilities, large commercial customers and industrial customers. Load growth is overstated as sales have trended down in the last 5 years. Since 1973 TPUD has added several substations to the system, yet system capacity is not referenced in the application. Therefore no meaningful determination of load growth can be made with the incomplete data TPUD provided. Rebuilding feeder 51 needs to be done no matter which option is chosen. Given that need is overstated and reliability problems increase for Tillamook with the transmission line, TPUD has failed to show the transmission line is necessary, especially since Option 3 has less impacts, costs less, increases reliability for coastal communities, and adds capacity to Wilson River.	RELIABILITY – Option 3 provides a new more reliable source of power to the Netarts/Oceanside area. (PUD noted that Option 3 was "Good" on reliability") Option 3 also provides a connection to other power sources and would substantially reduce the number of customers involved in an outage and the length of that outage. LOAD GROWTH The average load on the Wilson River Substations has dropped from 49.71 MW in 2011to 41.52 MW in 2017. With Option 3 the capacity of the Wilson River Substations will increase to 101 MW and the highest system peak (2009) is only 62.9 MW (see included chart) and this was before the creamery went to a propane boiler. Now the Creamery's boiler is also taking 4 MW off of the peak demand. AGING INFRASTRUCTURE The aging infrastructure can be fixed with Option 3 or other methods. A transmission line is not needed to do that. Option 3 provides the redundancy to allow the replacement of the aging infrastructure.	Remember TPUD ordered 4 new transformers and line 51 is being rebuilt anyhow.

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6	1.2	Safety of proposed transmission line	Transmission Line will satisfy the Commission's safety criterion, because it will be constructed, operated, and maintained to meet or exceed all applicable National Electrical Safety Code standards, as well as all applicable federal, state and local laws, regulations, and ordinances.	The Application includes sufficient information demonstrating the safety of the line.	The transmission line poses a fire hazard and not everybody will be able to evacuate safely due to the limited roads. Option 3 would be easier to construct with less impact to landowners because more of it would be in the road right of way.	Option 3 is safer because it is on road right of ways and does not go through 40 acres of forest	TPUD would have better access during our frequent floods after our flood waters go down because Option 3 is all on county road right of way except for a short distance at the end of Matejeck Road which the 2 farmers would give easements.
7	1.3	Practicability of proposed transmission line	Tillamook PUD, in collaboration with the community and its leaders, has developed a route that is practicable and has the least overall impact on the community.	The Application includes sufficient information describing practicability of the line.	Option 3 has less over all impact to farms and forests, is the least cost route, and uses existing right of ways and easements. Option 3 creates a more reliable distribution system for coastal communities by adding a line from the Trask substation which is served by a different BPA line than Wilson River is on. The transmission line option only has service from a single BPA line because both the transmission line and feeder 51 are served by the same BPA line. Having 2 BPA sources in the loop increases the reliability and makes Option 3 more practicable. Tillamook would also benefit from this dual source because line 51 links them up.	Option 3 is more practicable because it has less impact on farmland and forests and to the community. Option 3 is easier to construct because it is on the Road right of way. Option 3 would be easier to maintain once it is built with less impact to the farms and the forest.	Not true, Citizens Advisory Group (CAG) worked hard to keep poles and lines away from homes. The route was changed after their proposed routes. Now it goes over or very close to 12 homes with families and some businesses.
8	1.4	Justification of proposed transmission line	Transmission Line will provide many benefits to Tillamook PUD and its customers and will allow Tillamook PUD to continue to meet its obligation to provide safe and reliable service to all of its existing members and future members.	The Application includes sufficient information demonstrating the justification of the line.	The transmission line is not justified when Option 3 meets TPUD's needs with far less impact and costs less, without increasing Tillamook's outages. Using eminent domain on 20 landowners cannot be justified when Option 3 can be built without subjecting anyone to eminent domain.	Option 3 adds capacity to the Wilson River by putting a larger transformer close to Tillamook's critical loads instead of at the end of a 20 mile trip on the worst feeder of the system. Option 3 is also safer for coastal communities because it does not create a fire hazard in the forest. Option 3 increases reliability for coastal communities without increasing outage to Tillamook as the transmission line does. Since Option 3 provides similar benefits at a lower cost the transmission line cannot be justified.	Option 3 and Line 51 could be done without using eminent domain.
9	2	OAR 860-025-0030(1)(c): Spatial information	This rule provision requires an application for a CPCN to contain various maps and figures.	The Application includes the spatial information required by this rule.	There is no map showing the power returning to Tillamook on a rebuilt line 51. I am including a crude map of how TPUD plans to return 22 MWs of load from Oceanside to Tillamook on feeder 51 which has high outages from cars hitting poles and trees taking out the line.		
10	3	OAR 860-025-0030(1)(d): Cost information	This portion of the Commission's rules requires Tillamook PUD to provide estimated costs of certain components of the Transmission Line.	The Application includes the cost information required by this rule.	Option 3 costs less than half so all of the rate payers benefit.		They offered one time payment which was very low when the cities get monthly franchise fees and TPUD gets attachment fees from cable companies etc.
11	4	Financial feasibility information required under OAR 860-025-0030(1)e	The rate impact to existing members from the proposed transmission line is not expected to be significant. Tillamook PUD expects to receive financing for the Transmission Line from RUS.	The Application includes the financial information required by this rule.		Option 3 provides redundancy and capacity at the source of the Tillamook valley at less than 50% of the cost.	Option 3 is less than half the cost.
12	5	OAR 860-025-0030(1)(f): Information related to potential condemnation of property	Tillamook PUD is seeking consent, in the form of easements, from landowners along the Transmission Line route. Until easements are obtained, condemnation is a potential for most properties	The Application includes sufficient information relating to potential condemnation of property.		Option 3 would have almost no problem getting easements. With the transmission line option There are still over 20 properties that may need to have eminent domain.	Oregon Department of Agriculture, Oregon Farm Bureau, Oregon Dairy Farmers Association, and Tillamook County Creamery Association, the property owners on the route and private citizens all oppose the transmission line or extensive use of eminent domain.
13	6	OAR 860-025-0030(1)(g): Information related to alternate routes	TPUD conducted a thorough analysis of alternative routes for siting the proposed transmission line.	The Application includes sufficient information relating to alternate routes.	Insufficient and incorrect data was given for Option 3. Only transmission routes were considered by CAG.	TPUD only conducted an analysis of alternate transmission line routes. TPUD did not conduct a thorough analysis of other non transmission line routes. Option 3 was never fully vetted	They knew Option 3 was reliable but it was never discussed at the CAG meeting.

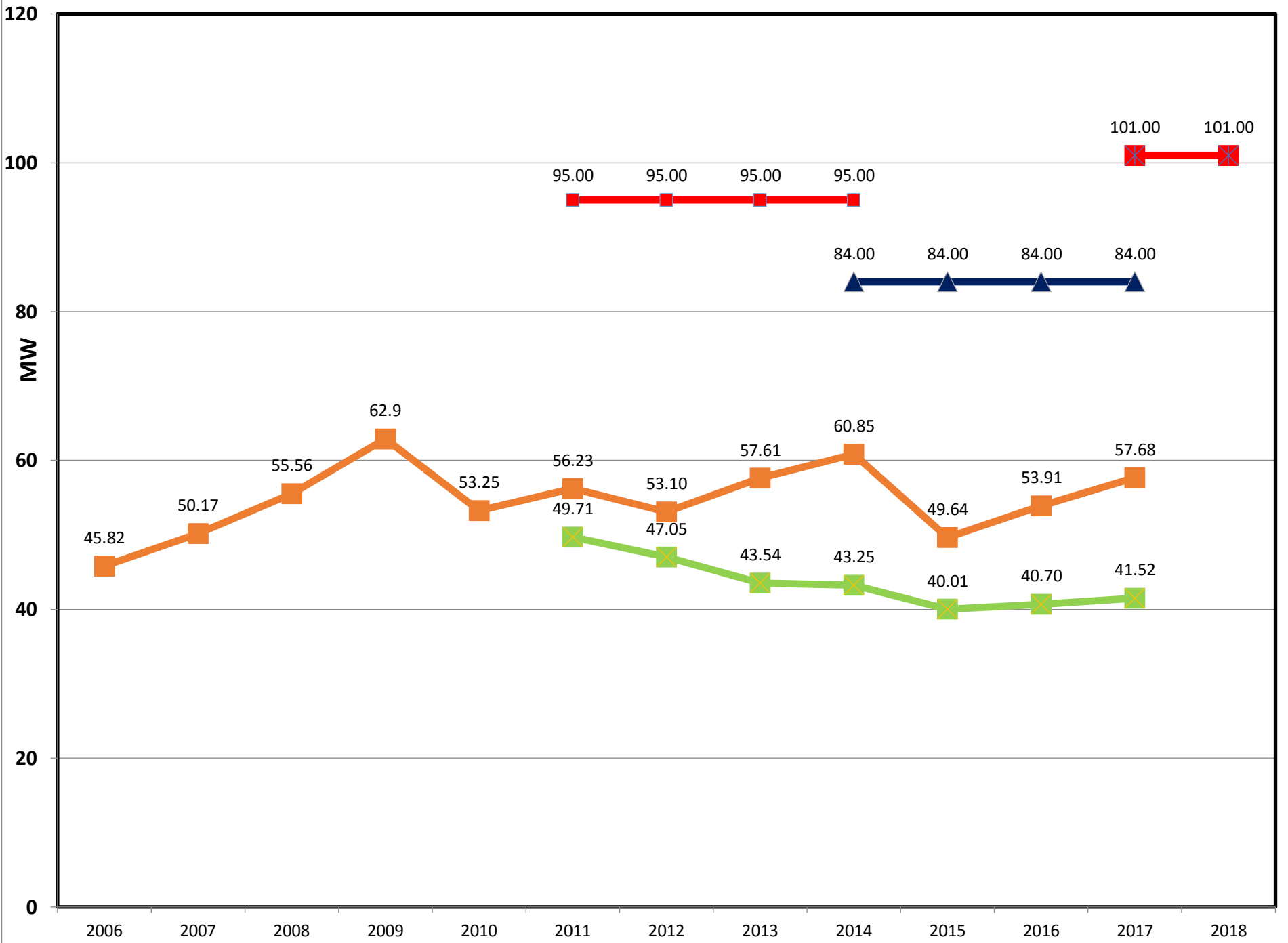
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14	7	OAR 860-025-0030(1)(h): Additional information	Tillamook PUD has conducted its own investigation into the need for the line and has determined it is in its customers' best interest to construct the line. The Transmission Line is needed to provide safe and reliable service to Tillamook PUD's customers.	TPUD has satisfied this condition.		TPUD eliminated Option 3 because of calculation errors even before it was presented to the public. Therefore Option 3 was never meant to be seriously considered. The transmission line option is the only option that TPUD has been advocating for the last 7 years. TPUD board ignored unsolicited public comments that returning power back to Tillamook on line 51 was not feasible.	TPUD has made errors in their math on Option 3. Routes have changed. They have not addressed the power coming back on line 51. How many other things are not reliable information?
15	8	OAR 860-025-0030(2) and (3): Land use information	As noted in the State Agency Coordination Program, all comprehensive plans in the state have been acknowledged to be in compliance with Statewide Planning Goals.	TPUD will rely on local government determinations for land use compatibility of the line and has demonstrated that such approvals are possible.	Option 3 is easier to get permitted and has fewer impacts because it is a distribution line.		Will see, but I think not.
16	8.1	Statewide planning goals	The Commission can determine that the application is consistent with Statewide Planning Goals	Independently from local land use approvals, the Application sufficiently describes how the proposed transmission line is consistent with applicable statewide planning goals.	Option 3 has far less impacts on coastal shorelands, farm zone and forest zone because it is in the road right of way more than the transmission line is and it avoids those areas with the exception of a short area in the forest (much less than the 4 miles of the transmission line in the forest).	The transmission line option has serious conflicts with Statewide Planning Goal 3 agriculture, Goal 4 forests, and 17 coastal shorelands. Option 3 does not have any of these conflicts.	Not yet, this proposed transmission line goes around our new Southern Flow Corridor. 521 acre restoration project. Remember this area is in the Coastal Shorelands Planning area. Bandon Marsh National Wildlife Refuge had problem with power lines and birds. Option 3 has far less impacts.

/s/ Doris Mast

/s/ David Mast

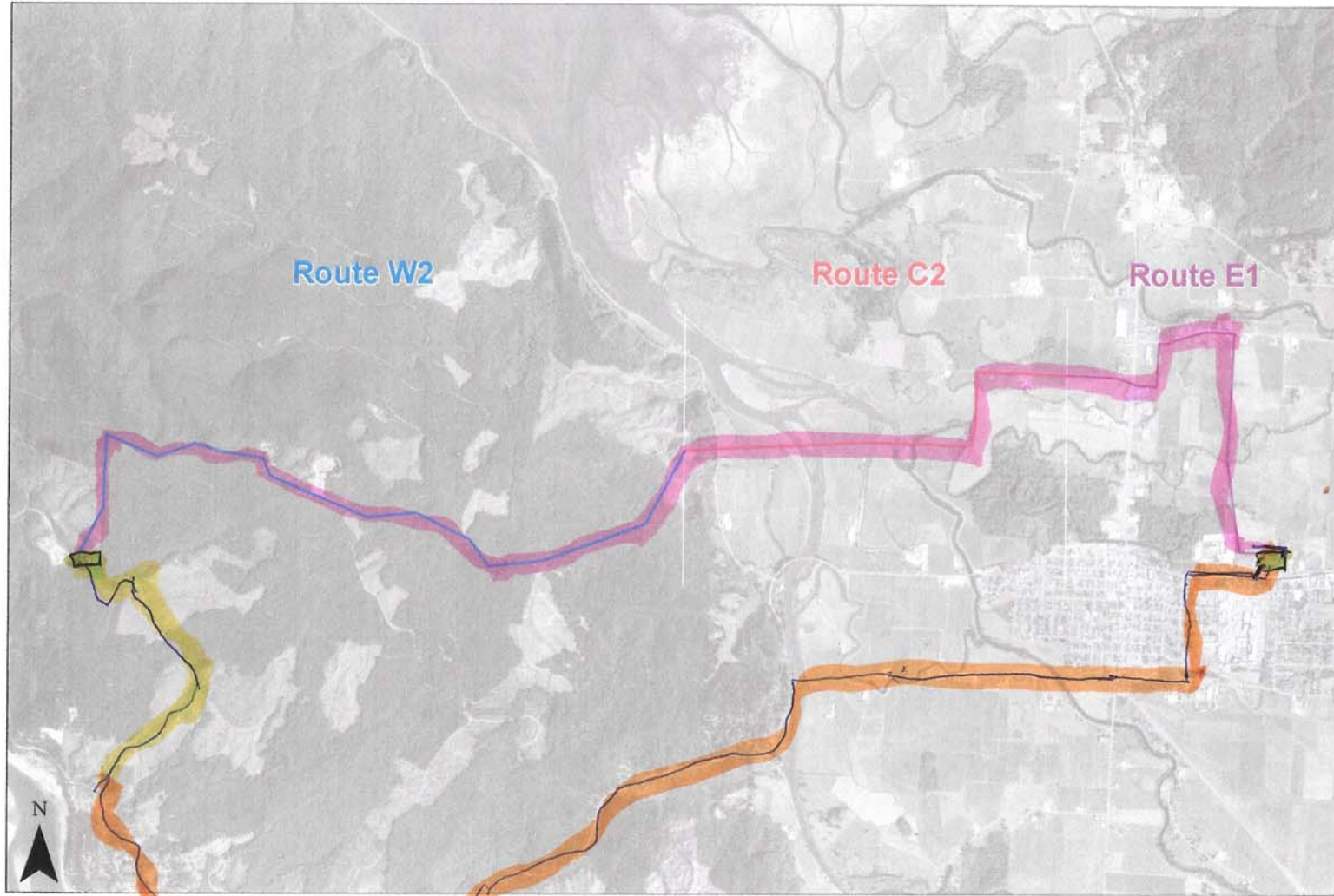
/s/Don Aufdermauer

Wilson River I & II Loads & Peaks vs Thermal Rating (Capacity)



■ Old Thermal Rating
 ■ Average Monthly Load
 ■ Highest Hourly Peak
 ▲ New Thermal Rating
 ■ With 17 MW Added Capacity (Option 3)

The Journey of 20 Miles to Go A Few Yards (Maybe) Doris 1



Transmission Line

New Distribution Link from Substation to Feeder 51

Feeder 51

Substation