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**V. Denise Saunders**  
Associate General Counsel

October 12, 2012

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission  
Attention: Filing Center  
550 Capitol Street NE, #215  
PO Box 2148  
Salem OR 97308-2148

**RE: PGE's Response to Troutdale Energy Center's Request for Hearing for RFP Scoring Clarification**

Portland General Electric Company ("PGE") is submitting for filing a redacted version of its Response to Troutdale Energy Center's Request for Hearing for RFP Scoring Clarification. Portions of this letter are **CONFIDENTIAL** and subject to protection by Protective Order No. 11-097. Hardcopies of the un-redacted pages have been placed on yellow paper in a separately sealed envelope bearing the legend "CONFIDENTIAL." Please do not place the confidential portions on the OPUC website.

This letter and the redacted version of the enclosed filing are being filed by electronic mail with the Filing Center and provided by electronic mail to all the parties on the service list. PGE will serve copies of the confidential letter upon all parties who have signed the protective order.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided. Thank you in advance for your assistance.

Sincerely,

*Denise Saunders*  
for V. Denise Saunders

V. DENISE SAUNDERS  
Associate General Counsel

VDS:qal  
Enclosures  
cc: UM 1535 Service List

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S (PGE) RESPONSE TO TROUTDALE ENERGY CENTER'S REQUEST FOR HEARING FOR RFP SCORING CLARIFICATION** to be served by electronic mail and by First Class U.S. Mail, postage prepaid and properly addressed, to those parties on the attached service list for OPUC Docket UM 1535. **Confidential Copies have been provided to those parties who have signed General Protective Order No. 11-097.**

Dated at Portland, Oregon, this 12<sup>th</sup> day of October, 2012.



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**SERVICE LIST 10/12/12  
OPUC DOCKET # UM 1535**

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October 12, 2012

**VIA ELECTRONIC FILING**  
**AND HAND DELIVERY**

Public Utility Commission of Oregon  
550 Capitol Street N.E., Suite 215  
Salem, Oregon 97301-2551

RE: Request for Hearing by Troutdale Energy Center for RFP Scoring Clarification  
(Portland General Electric, Docket UM 1535)

Dear Commissioners:

On October 5, 2012, the Troutdale Energy Center (TEC), a bidder in PGE's Capacity and Energy RFP, submitted a letter to you complaining about two issues that it believes could affect the score its bid will receive. PGE disagrees with the claims raised by TEC's letter. The Company also believes that by seeking intervention from the Commission at this stage of the RFP process, TEC is attempting to gain an unfair advantage for itself over all other bidders with respect to the evaluation of its proposal. In addition, TEC's approach harms the integrity of the RFP process by attempting to re-open issues already considered in the public process and addressed by the Commission and by undermining the role of the IE and Staff in overseeing the assessment and scoring of bids.

TEC has come in after the completion of the Commission's public process advocating for a position that would increase its bid score for reliability based on a misplaced perception that the bid scoring has not already accounted for the benefits of a direct interconnection to PGE's system. At the same time, TEC suggests a scoring approach that would undermine reliability for PGE customers by urging the Commission to force PGE to drop the requirement for firm transport and storage. Clearly, TEC is more concerned about the score its bid will receive than the reliability of energy for PGE's customers.

TEC's proposals have already been considered and rejected by the Commissioners after lengthy public proceedings which included extensive comments by NIPPC, a trade group of which TEC is a member. As discussed below, TEC raises no new information to warrant any additional action by the Commission. Moreover, the remedies that TEC seeks have either already been implemented or have previously been considered and rejected by the Commission.

Any delay of the RFP to revisit issues that have already been decided has the potential to harm other bidders, PGE and its customers. Multiple bidders have expended considerable money and resources to develop and submit proposals under the RFP rules and timeline already approved by the Commission. In addition, because bidders are required to hold their prices firm for 140 days (until December 26, 2012) any delay that pushes the completion of the RFP beyond this time could cause PGE and its customers to lose the value of the bids if they expire. The Commission has engaged in a comprehensive public review of PGE's RFP, lasting more than a year. It should not allow a bidder to come in at the eleventh hour and raise issues that have already been addressed in an attempt to obtain a better score for itself over other bidders in the RFP.

PGE will again address all of the issues raised by TEC below.

1. TEC's Transmission Concerns Have Been Addressed

TEC complains about "the use of BPA as the proxy for transmission service," apparently in reference to PGE's use of BPA transmission costs for projects proposing to use PGE's proposed Cascade Crossing transmission line. PGE's proposal to use BPA costs as a proxy was discussed at length during the public proceedings in this docket, was the subject of bidder Q&As on the IE's website, and was ultimately approved by the Commission. *See NIPPC Comments* at 12-15 (June 22, 2011); *NIPPC Comments* at 14-16 (Feb. 22, 2012); *PGE Reply Comments* at 15-17 (Mar. 7, 2012); *Bidder Q&A* Ref#122 (2/10/12), Ref#123 (2/10/12), Ref# 135 (5/30/12), and Ref# 148 (7/9/12); *see also* Order No. 12-215 at 3. The transcript excerpts from the June 5, 2012 public hearing show that the Commissioners, as well as TEC's trade group understood that the BPA costs would not apply to projects directly connecting to PGE's system. Attachment A at 1-2.

TEC's concern that the benefits of a direct connection are not considered in the RFP scoring process is misplaced. The two main issues TEC highlighted are:

- the benefits associated with the avoidance of a BPA wheel
- the risks associated with transmission on BPA's system

Clearly, a project that is directly connected to PGE's system avoids the cost of an additional leg of transmission that projects not directly connected to PGE's system will have to incur. This avoided cost is reflected in the price score of the bid which accounts for 60% of the total score.

TEC appears to suggest that bidders directly interconnected to PGE's system should get additional scoring benefits because of the "risk of wheeling power across the BPA system where PGE has no control over costs, maintenance or operations." TEC asks for "a full assessment of the benefits of directly interconnecting into PGE's system as compared to a project that must wheel across the BPA system." These assessments have already been conducted. All transmission providers, including BPA and PGE, perform interconnection studies for projects interconnecting to their systems. These studies identify and assess the known reliability risks and the costs for resolving such risks. If an interconnection study for a bid directly connected to PGE's system shows fewer reliability issues and therefore fewer costs than would be included in

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a study for a project connecting to BPA's system, such advantage will be reflected in the bid price and the corresponding bid score.

To the extent TEC is concerned about future cost increases or unforeseen reliability risks, we point out that unforeseeable costs and risks exist no matter who controls the system. Even a system operated by PGE may be subject to increased costs and risks. It would be impracticable to design scoring criteria to address future cost increases and risks which may or may not occur.

TEC states that the BPA Network Open Season (NOS) process is of particular concern with regard to this issue. The uncertainties generally associated with the BPA NOS process and how they would affect the evaluation of bids were considered during the public proceedings in this docket. Attachment A at 1-2; *NIPPC Comments* at 19 (Feb. 22, 2012); *PGE Reply Comments* at 20 (Mar. 7, 2012). There is no need to reconsider them at this time.

TEC makes unsubstantiated allegations that PGE's PW II project will require BPA to "accelerate the I-5 corridor upgrades" and that these upgrades cannot be completed by PW II's in-service dates, which will prompt PGE to return to the Commission with an urgent request for approval of the Trojan to Horizon project. TEC points to no evidence to back up its allegations nor can it.

Moreover, the issue of PGE's potential to seek future acknowledgement of the Trojan to Horizon Project was discussed repeatedly during the public proceedings and laid to rest. *See CUB Comments* at 3 (June 22, 2011); *ICNU Comments* at 2-3 (June 22, 2011); *NIPPC Comments* at 12-15 (June 22, 2011); *NIPPC Comments* at 14-15 (Feb. 22, 2012); *PGE Reply Comments* at 16-17 (Feb. 22, 2012); Attachment A at 2.

TEC asks for three "remedies" to address its transmission concerns. All of these remedies have already been implemented. First, TEC asks that the IE and OPUC staff review the scoring weights to ensure that the RFP properly evaluates costs, benefits, and risks associated with a project proposing a direct interconnection into PGE versus a project relying on BPA transmission services. This has been done. In its February 8 report on the RFP, the IE noted that "the evaluation methodology, modeling techniques, and assumptions were appropriate for the types of products being sought..." Moreover, the Commission's RFP Guideline 10c requires the IE to check whether the utility's scoring of the bids and selection of the short-lists are reasonable.

Second, TEC asks the Commission to compel PGE to release the BPA cost assumptions for stakeholder review and comment. These costs assumptions have been released. They are described in PGE's comments and on the IE website. *PGE Reply Comments* (May 25, 2012); *Bidder Q&A*: Ref#135 (5/31/12), Ref#149 (7/11/12). (8/1/12) PGE has also included as Attachment B to this letter, a sample of Q&As from the RFP website showing that the questions concerning transmission that TEC raises in its letter were addressed by PGE before any bids were due.



Finally, TEC asks the Commission to direct PGE, the IE, and OPUC staff to review bidders' transmission plans, including PGE self-build options, to ensure that each plan meets the requirements of the RFP for long-term firm transmission. This is already required as part of RFP Guidelines 9 and 10 and is being implemented. The Commission should allow the process a chance to work.

2. TEC Offers No New Information to Warrant the Commission's Reconsideration of its Earlier Determinations with Regard to Gas Storage

As with transmission, the complaints that TEC raises with regard to gas storage issues were raised by TEC's industry group and considered in the public proceedings in this docket. The only new circumstance that TEC identifies is information it received in its negotiations with NW Natural(NWN), namely that NWN requires a commitment of 1 Bcf or greater with a 30 year service agreement in order for NWN to embark on the storage expansion it states it needs in order to provide storage service. TEC makes the unsupported claim that a storage volume of around 150 to 250 thousand cubic feet is "more appropriate" for a 200 MW peaking facility. TEC states that PGE was able to bid PW II with a smaller volume of storage than NWN made available to other bidders, because the agreement was negotiated as part of a larger storage agreement for PGE's rate-based fleet. TEC however offers no evidence to support this claim.

The amount of storage that PGE requires for its PW II plant is not new information. It was included as part of the Owners Specifications which were made available for review and comment by stakeholders who signed the Protective Order, including NIPPC.

No party objected that this amount was too high.

The costs associated with PGE's NWN contract are properly accounted for in the Owner's Costs and will be reflected in the price score of the benchmark bid and any party proposing to build on the PW II site.

PGE's RFP was clear that firm gas deliveries on an intra-day/no-notice basis were required for the term of the resource proposal. TEC's October 5<sup>th</sup> letter to the Commission appears to be recognition that TEC's bid does not meet PGE's RFP requirements. Exhibit B to TEC's letter shows that, at the time bids were due, TEC was aware that long-term gas storage was necessary but "was not interested in a long-term agreement at all."

In any event, it seems that TEC has made a business decision, a decision completely within its control, not to pursue negotiations with NWN for storage service at NWN's required minimum commitment of 1 Bcf. TEC, a sophisticated player in this marketplace, had the opportunity to pursue other creative solutions for its storage needs, including a potential strategy that would include acquiring and bidding into the RFP an alternative proposal to acquire more storage than it believed necessary for its project.<sup>1</sup> TEC could also have chosen to bid on PGE's

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<sup>1</sup> TEC could put such additional storage capacity to other uses.

site.

TEC asks for three cures to remedy what it wrongly perceives to be an advantage that PGE has over TEC. Although no cure is necessary because PGE in fact has no advantage, we note that, as with transmission, the cures TEC proposes have already been considered by the Commission.

First, TEC proposes to set aside the prequalification requirement that bidders demonstrate a plan to acquire firm gas storage for flexible capacity fuel plans. This was considered at length in the public proceedings of this docket. *CUB Comments* at 4-6 (June 22, 2011); *ICNU Comments* at 3-4 (June 22, 2011); *NIPPC Comments* at 15-16 (June 22, 2011); *PGE Reply Comments* at 8-9 (July 18, 2011); *Staff Report* at 3 (May 29, 2012). The Commission addressed this issue in two Orders stating in both “[w]e agree with PGE that bidders must demonstrate that they have a plan to acquire gas storage and intraday scheduling to be eligible to participate in the RFP for flexible capacity. We do not believe that PGE has any special advantage in acquiring these services. Rather, the ability to obtain them is largely location-dependent.” *Order No. 12-215* at 2, quoting *Order No. 11-371* at 4. The fact that TEC had the opportunity to procure a storage contract with NWN and, instead, chose not to is evidence that PGE holds no advantage when accessing gas storage. Faced with the same opportunity, PGE chose to proceed while TEC chose not to.

Second, TEC asks the Commission to direct PGE, the IE, OPUC Staff and shortlisted bidders to collaboratively assess each shortlisted facility’s fuel plan for the ability to meet PGE Flexible Capacity Resource needs, potential opportunities to optimize the resulting PGE portfolio of storage and transportation agreements, and reflect those savings in the evaluation of each shortlisted facility. PGE’s RFP scoring team and the IE, under the direction of OPUC Staff, already assess the fuel plans of shortlisted bidders. TEC’s suggestion that PGE and bidders should collaborate to optimize PGE’s portfolio is misplaced. PGE’s current portfolio of assets is fully utilized and optimized for its system. Further, to the extent that PGE’s benchmark sites have synergies, PGE recognizes its obligation to maximize those synergies for its customers in developing its benchmark proposals. PGE made those sites available to third parties and allowed them to take advantage of any synergies.

Finally, TEC asks the Commission to direct PGE to separate the storage and transportation issues associated with natural gas storage and allow bidders whose gas transportation plans can access Mist storage to utilize the same PW II storage volume and pricing that PGE has negotiated using the purchasing power of the PGE ratepayers. The location-dependent nature of gas storage and transportation arrangements was discussed at length in the public proceedings, and, as referenced above, ruled on twice by the Commission. *Order No. 11-371* at 4; *NIPPC Comments* at 5-9 (February 22, 2012); *PGE Reply Comments* at 5-6 (March 7, 2012). PGE is aware that long term storage capacity is not available, without being subject to recall to NWN’s core utility service, at the Mist storage facility,<sup>2</sup> and it would be imprudent for PGE to award credit to bids proposing to use a resource that is not available. In addition, PGE cannot transfer the arrangements it negotiated for the PW II site to a different site. In addition to

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<sup>2</sup> See TEC’s Exhibit B.



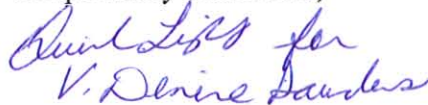
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operational and logistical constraints, TEC is a different entity with a different credit and operational profile. PGE simply does not have the unilateral right to assign or make changes to its storage contract. Finally, we note that PGE's contractual arrangements with NWN were available to bidders who wanted to bid on PGE's site.

In short, the remedies TEC proposes to address its transmission and gas complaints have either been adopted or discussed at length in earlier proceedings and rejected by the Commission. TEC has offered no new information to support any additional action by the Commission at this time. The Independent Evaluator, under the supervision of Commission Staff, is charged with overseeing the RFP process to ensure that it is conducted fairly and properly and for ensuring that all offers are treated impartially. RFP Guidelines 10b and 5. The IE's responsibilities include checking whether the utility's scoring of the bids and selection of the short-lists are reasonable. TEC offers no argument or evidence to indicate that the IE cannot or will not fulfill its responsibilities. The Commission should reject TEC's request for a hearing and allow the bids to be evaluated consistent with the Commission's RFP Guidelines.

Respectfully Submitted,



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VDS:qal

**Excerpt - Transcribed Audio#3 – June 5, 2012 OPUC Public Meeting**

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(Commissioner Savage): Can I just follow up before we get another comment? Right now, when you're including your transmission costs, so the transmission costs for the proposed plans that you're including in your self-build is just your Bonneville tariff rate? That's what you're doing now right, no more no less?

(Commissioner Ackerman): And that's the same burden that you are potentially putting on everybody else?

(Mr. Lobdell): Everybody else in the bid process.

(Mr. Darrington Outama): Unless those that are interconnected directly to our system.

(Mr. Lobdell): Then those parties do not have them.

\* \* \*

(Mr. Adams): Our concern is that only a single risk factor in this RFP has been singled out where PGE has reserved the right to update the risk factor and how all the bids, including the benchmarks, will be scored. That is transmission, which in our view, is PGE's, you know, possibly their weakest component on their site. While it is likely to change there's other risk factors for other sites that are likely to change also, such as a bidders' status in the permitting process, different lead time on equipment. All sorts of things can change in the 140 days that they have to commit to hold their bid price. We just thought it would be fair, if PGE's going to update transmission, that other bidders have the right later on to update things such as permitting or other things that would improve the risk profile of their bid. It's only fair.

(Mr. Outama): Thank you for that clarification. Part of the answer is that transmission is unique in its process. It's a third party conducted in a public form results of queue positions are posted and widely distributed. So with the duration of the process, a lot of things can change. If we have... For example, if we don't have the ability to update this information throughout the process, and yet we know that some of the queue holders have been thrown out through the public process, would it make sense to keep them in the queue? So this process of updating as information becomes more available is to recognize that the transmission process, the NOS process for BPA, takes time and that may not align very quickly or neatly with the requirement of them submitting their bids at the time their bids are due. And so, all it allows us for to do is within the initial short list and the final shortlist, for us to comb through the third party available information and see if anything has changed materially to affect the shortlist. And that's all we are trying to do. We did not isolate transmission because it was the weakest or the best for anyone. We have isolated for the purpose to match a third party process that doesn't link up with our process very neatly. And this is the trial and tribulations of other RFP experiences that we went through in having a final shortlist that was inactionable because some of them were dropped from the queue position, so in order to make a good selection... a good-faith selection at

1 the end, this is some of the things that we have allowed for to happen. Permitting and all the  
2 other costs or lead time, those are not third party or publically made available and we don't  
3 necessarily feel like we have the expertise in house to make that determination for all the bids.  
4 The bids will come through at the end of the final shortlist and move through a negotiation, at  
5 which point, we will expect to have updates, but in a bilateral controlled negotiated environment.  
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**Excerpt - Transcribed Audio#4**

8 (Mr. Kahn): Yes. I'm just going to make a couple of global comments item by item and then  
9 Greg can fill in. So transmission is the elephant in the room, but at least it's visible. I mean, we  
10 have a situation where Portland General has indicated in its' IRP and various planning processes,  
11 in the cost of service dockets some time ago that it plans to build, what Jim calls the Horizon  
12 line, and you know full well that it has planned to build the Cascade line for some time. So we all  
13 know what's going to happen. If Carty and Port Westward 2 are built, they will be back as a  
14 separate item talking about why they need the transmission lines because now the power plants  
15 are built. This is a problem. The IPP's who are going to bid in, will basically be taking and  
16 offering a snapshot. PGE is running a film. It's the fundamental problem. We suggest that you  
17 hold them to what they have advertised previously which is their plans to build new transmission  
18 and assign those costs to the bid.  
19

20 (Commissioner Savage): Can I make an observation on that? I can tell you this. Before they  
21 bring in South of Allston or even Cascade Crossing, we're going to be thoroughly evaluating this  
22 as part of their IRP. This is even before you get to rate recovery and we're bears on making sure  
23 that the benefits exceed the costs. So this comes down to me as do we assign any of the capital  
24 costs of potential lines. We've acknowledged one with conditions, but that means you've got to  
25 come back later... and one we're not even close to acknowledging because it hasn't been  
26 proposed. So we have to take into consideration (1) whether these will really ever be built, but  
27 we also have to take into consideration what's the fully allocated costs and what's the proper  
28 assignation compared to Bonneville tariff?  
29

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31 (Mr. Kahn): That's fine. To me it's self-evident the Horizon line for sure has to be built,  
32 because as a flex capacity resource they absolutely can't be dependent on Bonneville. I'm  
33 going...I can't see making the case right now for it. Notwithstanding that, I do believe that  
34 Portland General acknowledged and I want to be explicit, maybe even be real explicit about it. If  
35 somebody interconnects other than through BPA (say via to their system) via PacifiCorp or  
36 direct interconnection, then those bids should not be subject to the BPA tariff.  
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38 (Commissioner Ackerman): I think they said that. Didn't they say that?  
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40 (Mr. Kahn): I think so but it's the first time we're hearing it.  
41

42 (Mr. Outama): We can say that again.

**Attachment B – Select Bidder Q&As  
UM 1535 – PGE Response to Troutdale Energy Center**

Ref #: 178

Category: Transmission

Asked: 7/23/2012 3:42p

Posted: 7/27/2012 2:19p

**Question:** Projects located along the I-5 corridor and planning to use BPA transmission such as PGEs Port Westward II will exacerbate the South of Allston cutplane constraint on the BPA transmission system. BPAs upgrades addressing this constraint have been delayed to between 2016 and 2018 [see Columbia Grid 2012 System Assessment]. How will the RFP evaluate a project relying on upgrades that will not be in service before the latest possible start date required by the RFP? How will the RFP evaluate risks associated with the reliability of the BPA transmission system along the South of Allston or other cutplanes?

Answered: 7/27/2012 2:19p

**Answer:** A project relying on upgrades that will not be in service before the last possible start date required by the RFP must provide a bridging strategy showing that it will have firm transmission in place until such time as the upgrades are constructed. PGE will rely on BPA studies to inform scoring. See also answer to #179.

Ref #: 179

Category: Transmission

Asked: 7/23/2012 3:45p

Posted: 7/27/2012 2:18p

**Question:** Have PGE and BPA jointly studied the potential costs associated with Port Westward IIs integration onto the BPA transmission system? Have PGE and BPA studied the feasibility of accelerating BPAs upgrades addressing constraints and the resulting costs? If not, how will the RFP address potentially significant costs that have not been studied by the bidder or BPA?

Answered: 7/27/2012 2:18p

**Answer:** Transmission studies associated with the interconnection and transmission services for the Port Westward II site were submitted as part of the site specifications in the 2012 EPC / BOT / APA RFP silo on the IE website. All costs associated with system upgrades necessary to deliver Port Westward II energy to PGE load are included in the Owners Costs, also in the EPC silo. All studies and cost information are available for bidders who have executed the proper level of NDA. PGE expects bidders to include in their bid price the costs associated with the generation lead needed to connect the resource to the transmission system. Bidders should also provide any known costs of network upgrades due to their project. In the absence of studies, PGE will rely on BPA studies to inform scoring as they become available. PGE will not sign any definitive agreement without firm transmission.

Ref #: 149

Category: Transmission

Asked: 6/20/2012 2:47p

Posted: 7/11/2012 9:44a

**Attachment B – Select Bidder Q&As  
UM 1535 – PGE Response to Troutdale Energy Center**

**Question:** In PGEs response to Question 135, PGE states, For scoring purposes, we will assume that BPA transmission arrangements are in place for the life of any project developed on the Carty site and we will base the transmission costs on BPAs published tariff rate with estimated increases. These increases are consistent with the methodology used in Chapter 8 of the 2009 IRP and Chapter 6 of the 2011 IRP update. In Chapter 8 of the 2009 IRP PGE partially relies on the economic results from Case 4 and Case 5 to propose the construction of the Cascade Crossing Transmission Project. The assumed increases in the BPA transmission tariff in Case 4 are an average nominal rate of 4.0 percent from 2011 to 2025, after which the growth rate decreases to 3.2 percent, with a one-time increase in rates of 10 percent in 2015 and the assumed increase in the BPA transmission tariff in Case 5 are an average nominal rate of 4.0 percent from 2011 to 2025, after which the growth rate decreases to 3.5 percent, with a one-time increase in rates of 10 percent in 2015. There is no mention of the assumed increase in the BPA transmission tariff in Chapter 6 of the 2011 IRP update. Can PGE confirm whether it will use the assumed increases consistent with Case 4 or Case 5 for scoring purposes in the RFP?

**Answered:** 7/11/2012 9:44a

**Answer:** PGE will use estimated increases consistent with Cases 3 and 4 with a slight adjustment for an updated inflation value. In addition, PGE will update assumptions to include results from BPA rate cases to date.

**Ref #:** 135

**Category:** Transmission

**Asked:** 5/30/2012 10:38a

**Posted:** 5/31/2012 2:16p

**Question:** Since the Cascade Crossing power line project is considered a part of the PGE system: 1. If the Cascade Crossing project is not completed by December 31, 2017, will the Carty PGE self-build option be put in service on December 31, 2017? If yes then: a. Where/how will the Carty plant be interconnected to the bulk transmission system? b. What contractual transmission arrangement[s] will PGE enter into to transmit the power from Carty to the PGE system? c. What will be the length of term of such transmission arrangement[s]? d. What are the estimated annual costs including losses for such transmission arrangement[s]? e. What was the methodology and calculations to determine the cost of transmitting power from Carty to the PGE System?

**Answered:** 5/31/2012 2:16p

**Answer:** The Oregon Public Utility Commission RFP Guidelines require us to keep bid information, including information pertaining to the benchmark bid, confidential. Therefore, we cannot provide details about the self-build bid. We can say that the RFP is soliciting bids on the Carty site to be in service no earlier than 2014 and no later than 2017. As we stated in our IRP, the primary transmission path for a plant on the Carty site is on the BPA transmission system. We have provided a write up on the transmission strategy in the Site Specifications, and details about the interconnection arrangements with BPA in the Owners Costs as part of our April 27th submittal. This information is available to qualified bidders under NDA. For scoring purposes, we will assume that BPA transmission arrangements are in place for the life of any project developed on the Carty site and we will base the transmission costs on BPAs published tariff rate with estimated increases. These increases are consistent with the methodology used in Chapter 8 of the 2009 IRP and Chapter 6 of the 2011 IRP update.