

October 14, 2014

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: North American Electric Reliability Corporation
Docket No. RR14-6-000
Request to Submit Revisions to the 2015 Budget and Assessments of
Peak Reliability, Inc. to Reflect Additional Revenues from British Columbia Hydro
and Power Authority**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby submits the “Request of the North American Electric Reliability Corporation to Submit Revisions to the 2015 Budget and Assessments of Peak Reliability, Inc. to Reflect Additional Revenues from British Columbia Hydro and Power Authority” in Docket No. RR14-6.

NERC’s filing consists of: (1) this transmittal letter, (2) the narrative text of this filing which follows this transmittal letter, and (3) Attachments 1, 2 and 3, all of which are being transmitted in a single pdf file.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Owen E. MacBride
Owen E. MacBride

Attorney for North American Electric
Reliability Corporation

UNITED STATES OF AMERICA
Before the
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION) **Docket No. RR14-6-000**
)

REQUEST OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
TO SUBMIT REVISIONS TO THE 2015 BUDGET AND ASSESSMENTS
OF PEAK RELIABILITY, INC.
TO REFLECT ADDITIONAL REVENUES FROM
BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby requests to submit certain revisions to the 2015 Business Plan and Budget of Peak Reliability, Inc. (“Peak”), including a revised schedule of assessments which reduces Peak’s 2015 assessments to all load serving entities and designees (“LSEs”) in the U.S. and Mexico portions of the Western Electricity Coordinating Council (“WECC”) region from the assessment amounts submitted in NERC’s original August 22, 2014 filing in this docket. The revised budget and assessment schedules reflect that on October 8, 2014, Peak entered into an agreement with the British Columbia Hydro and Power Authority (“BC Hydro”), pursuant to which BC Hydro’s Balancing Authority Area will remain part of the Peak Reliability Coordination Area in the Western Interconnection (“Agreement”). Under the Agreement, BC Hydro will pay its full assessment (determined using the Net Energy for Load (“NEL”) method) to Peak for 2015 (and subsequent years during the term of the Agreement) and 50 percent of its assessment for 2014.

On September 30, 2014, in Docket No. RR13-9-003, the Commission approved NERC’s petition for a special assessment for Peak. The need for the special assessment was based on the fact that BC Hydro and the Alberta Electricity System Operator (“AESO”) had not paid their

2014 assessments to Peak.¹ The original Peak assessment to BC Hydro for 2014 was \$2,073,380 (which represents 7.012% of total 2012 NEL in WECC). Pursuant to the Agreement, BC Hydro has now agreed to make a payment to Peak of \$1,036,690 (50 percent of the original assessment) for 2014. Invoices have already been issued to the U.S. and Mexico LSEs in the WECC region for the 2014 special assessment approved by the Commission, and it would be confusing and administratively cumbersome to now attempt to issue revised invoices for the special assessment reflecting the payment that Peak will receive from BC Hydro for 2014. Therefore, Peak is proposing to treat the \$1,036,690 payment from BC Hydro as other funding (a “Contracted Assessment”) for 2014, which will increase Working Capital Reserve at December 31, 2014. The \$1,036.690 increase in Working Capital Reserve in turn is being used (as described below) to reduce the 2015 Peak assessments to all U.S. and Mexico LSEs in the WECC region.

Similarly, NERC’s original August 22, 2014 filing in this docket included a proposed schedule of 2015 assessments for Peak which did not allocate any portion of Peak’s 2015 funding requirement to BC Hydro or the AESO. No assessments were allocated to BC Hydro or AESO because, at that time, these entities had not paid their 2014 assessments to Peak nor entered into any agreements to provide compensation or revenue to Peak for 2015.² Based on the Agreement, BC Hydro will now pay an assessment to Peak of \$3,063,771 for 2015.³ The amount of this BC Hydro assessment for 2015 reduces the originally-proposed 2015 Peak assessments to all U.S. and Mexico LSEs in the WECC region on a pro rata basis based on NEL.

The overall impact is that for 2015, the payments from BC Hydro of \$1,036,690 for 2014 and the assessment to BC Hydro of \$3,063,771 for 2015 is being used by Peak to reduce the

¹ *North American Electric Reliability Corporation, Order Approving Special Assessment for Peak Reliability, Inc.*, 148 FERC ¶ 61,252 (2014) (“Peak Special Assessment Order”). NERC’s petition in Docket No. RR13-9-003 was filed on July 23, 2014.

² See NERC’s 2015 Business Plan and Budget Filing, August 22, 2014, at 113.

³ As shown on **Attachment 3**, BC Hydro’s NEL for 2013 (the NEL data used to determine 2015 assessments) is 7.303% of the total NEL in the WECC region excluding the NEL of the AESO.

originally-proposed 2015 assessments to all U.S. and Mexico LSEs in the WECC region by \$4,100,461, with the reduction allocated among those LSEs on the basis of NEL.

This filing includes the following three attachments:

Attachment 1 to this filing is a revised Total Statutory Statement of Activities, Fixed Assets Expenditures and Changes in Working Capital for Peak for 2015, reflecting the Agreement and in particular the receipt of the 2014 Contracted Assessment from BC Hydro.

Attachment 2 is a revised Table B-1, Working Capital Reserve Analysis for Peak for 2014-2015, reflecting the Agreement and in particular the impact of the Contracted Assessment payment from BC Hydro in reducing Peak's 2015 assessment requirement.

Attachment 3 is a revised 2015 assessment schedule for Peak, showing the calculation of the revised 2015 Peak assessments for all U.S. and Mexico LSEs in the WECC region.

Peak is proposing to replace the assessment schedule submitted in its 2015 Business Plan and Budget included in NERC's original August 22, 2014 filing in this docket with the revised assessment schedule in **Attachment 3**. NERC therefore requests that the Commission issue an order approving the revised 2015 assessment schedule as expeditiously as possible, so that invoices can be issued for Peak's 2015 assessments based on the revised assessment schedule.

II. NOTICES AND COMMUNICATIONS

Notices and communications concerning this filing may be addressed to:

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III. DISCUSSION

On July 23, 2014, NERC filed a petition in Docket No. RR13-9-003 requesting authority for a supplemental assessment for Peak for 2014, in the total amount of \$4,030,696 to U.S. LSEs in the WECC region. The basis for the request was that BC Hydro and AESO had not paid their 2014 assessments to Peak, totaling \$ 4,094,340.⁴ As stated in that petition, BC Hydro's unpaid assessment for 2014 was \$2,073,380. On September 30, 2014, the Commission issued the Peak Special Assessment Order approving the requested special assessment. WECC, as billing agent for Peak, promptly issued invoices to LSEs for the special assessment amounts authorized by the Commission. In the Peak Special Assessment Order, the Commission also directed, as proposed by NERC, that "if Peak Reliability receives any compensation from AESO or BC Hydro for 2014, Peak Reliability use the amount received as a funding source to reduce its requested assessment in the next year for which it submits a budget."⁵

On August 22, 2014, NERC submitted its 2015 Business Plan and Budget filing in this docket, which included Peak's proposed 2015 Business Plan and Budget and proposed assessments.⁶ Peak's proposed 2015 assessments as submitted in that filing did not include any assessments to BC Hydro (or the AESO), because at that time, neither entity had paid its 2014 assessment to Peak nor agreed to pay assessments or other compensation to Peak for 2015.

On October 8, 2014, Peak entered into the Agreement with BC Hydro, pursuant to which BC Hydro's Balancing Authority Area will remain part of the Peak Reliability Coordination Area in the Western Interconnection. Under the Agreement, BC Hydro will pay its full assessment to Peak for 2015 (and subsequent years during the term of the Agreement) and 50

⁴ The difference between the total unpaid BC Hydro and AESO assessments (\$4,094,340) and the requested special assessment amount to U.S. LSEs (\$4,030,696), equal to \$63,644, was allocated to the LSE in the Mexico portion of the WECC region.

⁵ Peak Special Assessment Order at ¶10 and 13.

⁶ Peak's schedule of proposed 2015 assessments to LSEs was included with its proposed 2015 Business Plan and Budget, which is Attachment 11 to the August 22, 2014 filing.

percent of its original assessment for 2014. The payment of 50 percent of Peak's original assessment for 2014 is equal to \$1,036,690 (*i.e.*, \$2,073,380 times 0.50 = \$1,036,690).

In accordance with the directive in the Peak Special Assessment Order, Peak is proposing to use the payment of \$1,036,690 that BC Hydro will make for 2014 to reduce Peak's requested assessments for 2015, in the manner described below. Similarly, by this filing, Peak is seeking to incorporate BC Hydro's agreement to pay a NEL-based assessment for 2015 into Peak's overall calculation of its 2015 assessments, thereby reducing Peak's 2015 assessments to all U.S. and Mexico LSEs in the WECC region from the amounts requested in the original August 22, 2014 filing in this docket.

Attachment 1 is a revised Total Statutory Statement of Activities, Fixed Assets Expenditures and Changes in Working Capital for Peak for 2015, reflecting the Agreement and in particular the receipt of the Contracted Assessment for BC Hydro.⁷ Specifically, BC Hydro's payment of \$1,036,690 for 2014 pursuant to the Agreement is now shown in Peak's 2014 Projection as Funding that was not included in Peak's 2014 Budget. As shown on **Attachment 2** (described in the next paragraph below), the \$1,036,690 of additional funding for 2014 increases Peak's projected Working Capital Reserve at December 31, 2014, and is therefore used to reduce Peak's required 2015 assessment by that same amount of \$1,036,690. In the "2015 Budget" column of **Attachment 1**, the Assessments amount of \$40,916,546 is lower by \$1,036,690 than the 2015 Assessments amount shown in Peak's original Total Statutory Statement of Activities in Attachment 11 to the August 22, 2014 filing in this docket (which was \$41,953,236; *i.e.*, \$41,953,236 minus \$1,036,690 = \$40,916,546).

Attachment 2 is a revised Table B-1, Working Capital Reserve Analysis for Peak for 2014-2015, reflecting the Agreement and in particular the impact of the Contracted Assessment

⁷ Peak's original Total Statutory Statement of Activities, Fixed Assets Expenditures and Changes in Working Capital for 2015 appears on page 8 of Attachment 11 to NERC's August 22, 2014 filing in this docket.

payment from BC Hydro for 2014 in reducing the 2015 assessment requirement.⁸ BC Hydro's Contracted Assessment payment of \$1,036,690 for 2014 is now shown as funding received in 2014, which increases Peak's projected Working Capital Reserve at December 31, 2014 to \$1,162,175 from the amount of \$125,485 shown on original Table B-1. With the higher Working Capital Reserve at December 31, 2014, the adjustment to Peak's 2015 assessments to achieve its target Working Capital Reserve at December 31, 2015 of \$3,230,000 (which is not changed from original Table B-1) is \$2,067,825; this number is \$1,036,690 lower than the adjustment amount of \$3,104,515 shown on original Table B-1. As a result, Peak's required 2015 assessment shown on the revised Table B-1 is \$40,916,546, which is \$1,036,690 lower than the 2015 assessment amount of \$41,953,236 shown on original Table B-1.

Attachment 3 shows the calculation of the revised 2015 assessments to all LSE's (excluding AESO) in the WECC Region. Each LSE's percentage of total NEL is now calculated based on a total 2013 regional NEL amount that includes BC Hydro's NEL of 59,004,439 Mwh (*see* Column 5). BC Hydro's percentage of the total NEL is 7.303% (*see* Column 7); the NEL percentages of all U.S. and Mexico LSEs in the WECC region are correspondingly reduced from the percentages shown in Peak's original 2015 assessment schedule. The revised NEL percentages are used to reallocate the original 2015 assessment amount of \$41,953,236 among the LSEs, as shown in Column 11. Then, the assessment amount for each LSE except BC Hydro is further reduced by its allocated (based on its NEL percentage) share of BC Hydro's Contracted Assessment payment for 2014 of \$1,036,690 (*see* Column 12). BC Hydro is excluded in this step so that its own 2015 assessment amount is not reduced as a result of its 2014 Contracted Assessment payment. Column 13 of **Attachment 3** shows the final, revised 2015 assessment amounts for BC Hydro and for each LSE in the U.S. and Mexico portions of the WECC region, based on the revised total 2015 Peak assessment amount of \$40,916,546.

⁸ Peak's original Table B-1 for 2015 appears at page 35 of its 2015 Business Plan and Budget, Attachment 11 to the August 22, 2014 filing in this docket.

The end result of the assessment calculation procedure shown on **Attachment 3** and described in the immediately preceding paragraph is that BC Hydro's 2014 Contracted Assessment payment of \$1,036,690 and its 2015 assessment of \$3,063,771 serve to reduce the 2015 assessments to all LSEs in the U.S. and Mexico portions of the WECC region from the amounts shown in Peak's original 2015 assessment schedule provided in Attachment 11 to NERC's August 22, 2014 filing in this docket.

As noted earlier, promptly after the Commission issued the Peak Special Assessment Order on September 30, 2014, WECC, as billing agent for Peak, issued invoices to LSEs in the U.S. and Mexico portions of the WECC region for the special assessment amounts. For this reason, it would be confusing and administratively cumbersome to now attempt to issue revised invoices for the special assessment reflecting the payment that Peak will receive from BC Hydro for 2014 pursuant to the Agreement. Therefore, Peak is proposing to use the \$1,036,690 payment from BC Hydro for 2014 in the manner described above to reduce 2015 assessments to LSEs in the U.S. and Mexico portions of the WECC region. Further, this approach complies with the directive in the Peak Special Assessment Order that "if Peak Reliability receives any compensation from AESO or BC Hydro for 2014, Peak Reliability use the amount received as a funding source to reduce its requested assessment in the next year for which it submits a budget."

As the Commission is aware, pursuant to its regulations at 18 C.F.R. §39.4(c), it issues its order on NERC's annual business plan and budget filings by November 2 of the year preceding the budget year. Invoices are then promptly issued to LSEs by NERC and, for LSE's in the WECC region, by WECC, for the assessment amounts for NERC, the Regional Entities and Peak, in order that revenues for the budget year can begin to be received in December of the preceding year and January of the budget year. Peak is proposing to replace its 2015 assessment schedule submitted in the original August 22, 2014 filing in this docket with the 2015 assessment schedule provided in **Attachment 3** to this filing. Therefore, Peak is requesting that the

Commission issue an order as expeditiously as possible approving the revised 2015 assessments in **Attachment 3**, so that WECC (as billing agent for Peak) can issue invoices for Peak's 2015 assessments during November 2015.

IV. CONCLUSION

For the reasons set forth herein, the Commission is respectfully requested to issue an order, as expeditiously as possible, approving the revisions to Peak's 2015 Business Plan and Budget provided in **Attachments 1** and **2** to this filing and authorizing Peak's revised 2015 assessments to U.S. LSEs in the WECC region shown in **Attachment 3** to this filing.

Respectfully submitted,

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Michael Walker
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Chicago, Illinois, this 14th day of October, 2014.

/s/ Owen E. MacBride
Owen E. MacBride

Attorney for North American
Electric Reliability Corporation

ATTACHMENT 1

**REVISED 2015 TOTAL STATUTORY STATEMENT OF ACTIVITIES,
FIXED ASSETS EXPENDITURES AND CHANGE IN WORKING
CAPITAL FOR PEAK RELIABILITY, INC.**

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital 2014 Budget & Projection, and 2015 Budget

STATUTORY

	2014 Budget	2014 Projection	Variance 2014 Projection v 2014 Budget Over(Under)	2015 Budget	Variance 2015 Budget v 2014 Budget Over(Under)
Funding					
Funding					
Assessments	\$ 29,568,031	\$ 29,568,031	\$ -	\$ 40,916,546	\$ 11,348,515
Contracted Assessment	-	1,036,690	1,036,690	-	-
Penalty Sanctions	-	-	-	-	-
Total Funding	<u>\$ 29,568,031</u>	<u>\$ 30,604,721</u>	<u>\$ 1,036,690</u>	<u>\$ 40,916,546</u>	<u>\$ 11,348,515</u>
Membership Dues	-	-	-	-	-
Federal Grants	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	156,000	26,800	(129,200)	78,000	(78,000)
Miscellaneous	-	-	-	-	-
Total Funding (A)	<u>\$ 29,724,031</u>	<u>\$ 30,631,521</u>	<u>\$ 907,490</u>	<u>\$ 40,994,546</u>	<u>\$ 11,270,516</u>
Expenses					
Personnel Expenses					
Salaries	\$ 14,959,387	\$ 16,965,760	\$ 2,006,373	\$ 18,424,141	\$ 3,464,753
Payroll Taxes	963,710	1,307,150	343,440	1,299,123	335,414
Benefits	2,510,604	2,072,244	(438,360)	2,874,619	364,015
Retirement Costs	963,708	1,219,871	256,162	1,474,873	511,164
Total Personnel Expenses	<u>\$ 19,397,409</u>	<u>\$ 21,565,024</u>	<u>\$ 2,167,615</u>	<u>\$ 24,072,756</u>	<u>\$ 4,675,347</u>
Meeting Expenses					
Meetings	\$ 306,183	\$ 256,605	\$ (49,578)	\$ 196,445	\$ (109,738)
Travel	804,138	714,834	(89,304)	914,035	109,897
Conference Calls	45,084	29,223	(15,861)	29,144	(15,940)
Total Meeting Expenses	<u>\$ 1,155,405</u>	<u>\$ 1,000,662</u>	<u>\$ (154,743)</u>	<u>\$ 1,139,624</u>	<u>\$ (15,781)</u>
Operating Expenses					
Consultants & Contracts	\$ 1,267,500	\$ 1,742,632	\$ 475,132	\$ 906,600	\$ (360,900)
Office Rent	1,276,728	1,519,151	242,423	1,562,120	285,392
Office Costs	6,986,326	6,626,139	(360,187)	7,159,750	173,424
Professional Services	663,280	813,366	150,086	1,310,200	646,920
Miscellaneous	-	-	-	0	0
Depreciation	3,625,000	3,891,221	266,221	4,450,000	825,000
Total Operating Expenses	<u>\$ 13,818,834</u>	<u>\$ 14,592,510</u>	<u>\$ 773,676</u>	<u>\$ 15,388,670</u>	<u>\$ 1,569,836</u>
Total Direct Expenses	<u>\$ 34,371,648</u>	<u>\$ 37,158,196</u>	<u>\$ 2,786,548</u>	<u>\$ 40,601,050</u>	<u>\$ 6,229,402</u>
Indirect Expenses	<u>\$ -</u>	<u>\$ (86,122)</u>	<u>\$ (86,122)</u>	<u>\$ (110,328)</u>	<u>\$ (110,328)</u>
Other Non-Operating Expenses	<u>\$ -</u>	<u>\$ 56</u>	<u>\$ 56</u>	<u>\$ -</u>	<u>\$ -</u>
Total Expenses (B)	<u>\$ 34,371,648</u>	<u>\$ 37,072,131</u>	<u>\$ 2,700,482</u>	<u>\$ 40,490,722</u>	<u>\$ 6,119,073</u>
Change in Assets	<u>\$ (4,647,618)</u>	<u>\$ (6,440,610)</u>	<u>\$ (1,792,992)</u>	<u>\$ 503,825</u>	<u>\$ 5,151,442</u>
Fixed Assets					
Depreciation	\$ (3,625,000)	\$ (3,891,221)	\$ (266,221)	\$ (4,450,000)	\$ (825,000)
Computer & Software CapEx	1,373,000	1,118,740	(254,260)	2,025,000	652,000
Furniture & Fixtures CapEx	36,000	18,000	(18,000)	11,000	(25,000)
Equipment CapEx	803,000	963,264	160,264	850,000	47,000
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	-	-	-	-	-
Incr(Dec) in Fixed Assets (C)	<u>\$ (1,413,000)</u>	<u>\$ (1,791,217)</u>	<u>\$ (378,217)</u>	<u>\$ (1,564,000)</u>	<u>\$ (151,000)</u>
TOTAL BUDGET (B+C)	<u>32,958,648</u>	<u>35,280,914</u>	<u>2,322,265</u>	<u>38,926,722</u>	<u>5,968,073</u>
TOTAL CHANGE IN WORKING CAPITAL (A-B-C)	<u>\$ (3,234,618)</u>	<u>\$ (4,649,393)</u>	<u>\$ (1,414,775)</u>	<u>\$ 2,067,825</u>	<u>\$ 5,302,442</u>
FTEs	149.1	140.1	(9.0)	162.7	13.6
HC	155.0	151.0	(4.0)	167.0	12.0

ATTACHMENT 2

**REVISED TABLE B-1,
WORKING CAPITAL RESERVE ANALYSIS 2014-2015
FOR PEAK RELIABILITY, INC.**

Working Capital Reserve Analysis 2014-2015

STATUTORY

Beginning Working Capital Reserve (Deficit), December 31, 2013		0
Plus: Transfer of Reserves from WECC, January 2, 2014		5,811,568
Plus: 2014 Funding (from Load Serving Entities (LSE) or designees)		29,568,031
Plus: 2014 Contracted Assessments		1,036,690
Plus: 2014 Other funding sources		26,800
Less: 2014 Projected expenses & capital expenditures		(35,280,914)
Projected Working Capital Reserve (Deficit), December 31, 2014		<u><u>1,162,175</u></u>
Desired Working Capital Reserve, December 31, 2015	1	3,230,000
Less: Projected Working Capital Reserve, December 31, 2014		(1,162,175)
Increase(decrease) in assessments to achieve desired Working Capital Reserve		<u><u>2,067,825</u></u>
2015 Expenses and Capital Expenditures		38,926,722
Less: Other Funding Sources		(78,000)
Adjustment to achieve desired Working Capital Reserve		2,067,825
2015 Peak Assessment		<u><u>40,916,546</u></u>

ATTACHMENT 3

**REVISED 2015 ASSESSMENTS SCHEDULE
FOR PEAK RELIABILITY, INC.**

Revised Allocation of 2015 Peak Reliability Assessments
2013 NEL

1	2	3	4	5	6	7	8	9	10	11	12	13
Load Serving Entity	Balancing Authority	NEL w/o AESO	US NEL	Canada NEL	Mexico NEL	Percent Peak Total (w/o AESO)	Percent US Total	Percent Canada Total	Percent Mexico Total	Funding Allocation	Allocation of BCH 2014 Payment	Funding Less BCH Pymt = Assessments
Tri-State Generation & Transmission Association, Inc.	Public Service Company of New Mexico	2,642,944	2,642,944			0.327%	0.358%	0.000%	0.000%	137,233	(3,658)	133,575
Truckee Donner Public Utility District	Sierra Pacific Power Company	154,280	154,280			0.019%	0.021%	0.000%	0.000%	8,011	(214)	7,797
Tucson Electric Power Company	Tucson Electric Power Company	15,085,818	15,085,818			1.867%	2.046%	0.000%	0.000%	783,322	(20,881)	762,441
Turlock Irrigation District	Turlock Irrigation District	2,135,260	2,135,260			0.264%	0.290%	0.000%	0.000%	110,872	(2,956)	107,916
U.S. Army Yuma Proving Ground	Western Area Power Administration, Lower Colorado Region	16,326	16,326			0.002%	0.002%	0.000%	0.000%	848	(23)	825
U.S. BOR East Greenacres (Rathdrum)	Avista Corporation	4,176	4,176			0.001%	0.001%	0.000%	0.000%	217	(6)	211
U.S. Bor Spokane Indian Development	Avista Corporation	3,136	3,136			0.000%	0.000%	0.000%	0.000%	163	(4)	159
Unit B Irrigation District	Arizona Public Service Company	24	24			0.000%	0.000%	0.000%	0.000%	1	-	1
US Air Force Base, Fairchild	Avista Corporation	49,053	49,053			0.006%	0.007%	0.000%	0.000%	2,547	(68)	2,479
US Dept of Energy - Kirtland AFB	Public Service Company of New Mexico	410,793	410,793			0.051%	0.056%	0.000%	0.000%	21,330	(569)	20,761
Wells Rural Electric Cooperative	Sierra Pacific Power Company	672,455	672,455			0.083%	0.091%	0.000%	0.000%	34,917	(931)	33,986
Wellton-Mohawk Irrigation & Drainage District	Western Area Power Administration, Lower Colorado Region	401	401			0.000%	0.000%	0.000%	0.000%	21	(1)	20
West Oregon Electric Cooperative, Inc.	Portland General Electric Company	12,860	12,860			0.002%	0.002%	0.000%	0.000%	668	(18)	650
Western Area Power - Loveland, CO	Public Service Company of Colorado	364,173	364,173			0.045%	0.049%	0.000%	0.000%	18,909	(504)	18,405
Western Area Power - Loveland, CO	Western Area Power Administration - Colorado Missouri	2,054,674	2,054,674			0.254%	0.279%	0.000%	0.000%	106,688	(2,844)	103,844
Western Area Power Administration - CRSP	Western Area Power Administration - Colorado Missouri	2,053,652	2,053,652			0.254%	0.279%	0.000%	0.000%	106,635	(2,843)	103,792
Western Area Power Administration - Sierra Nevada Region	Balancing Authority of Northern California	1,324,532	1,324,532			0.164%	0.180%	0.000%	0.000%	68,776	(1,833)	66,943
Western Area Power Administration-Desert Southwest Region	Western Area Power Administration, Lower Colorado Region	3,225,943	3,225,943			0.399%	0.438%	0.000%	0.000%	167,505	(4,465)	163,040
Western Area Power Administration-Upper Great Plains Region	NorthWestern Energy	7,688	7,688			0.001%	0.001%	0.000%	0.000%	399	(11)	388
Western Area Power Administration-Upper Great Plains Region	Western Area Power Administration - Upper Great Plains West	391,282	391,282			0.048%	0.053%	0.000%	0.000%	20,317	(542)	19,775
Wyoming Municipal Power Agency	Western Area Power Administration - Colorado Missouri	280,327	280,327			0.035%	0.038%	0.000%	0.000%	14,556	(388)	14,168
Yampa Valley Electric Association	Public Service Company of Colorado	630,694	630,694			0.078%	0.086%	0.000%	0.000%	32,748	(873)	31,875
Yuma Irrigation District	Arizona Public Service Company	3,112	3,112			0.000%	0.000%	0.000%	0.000%	162	(4)	158
Yuma-Mesa Irrigation District	Arizona Public Service Company	175	175			0.000%	0.000%	0.000%	0.000%	9	-	9
		807,967,432	737,348,098	59,004,439	11,614,895	100.000%	100.000%	100.000%	100.000%	41,953,236	(1,036,690)	40,916,546
		-	91.3%	7.3%	1.4%	-	-	-	-	-	-	-