

August 27, 2019

**Via Email** ([techforum@bpa.gov](mailto:techforum@bpa.gov))

U.S. Department of Energy  
Bonneville Power Administration  
Transmission Services

**Re: Comments of Portland General Electric Company, on the *De Minimis* Impact Dead-Band for Network Flowgates**

Portland General Electric Company (PGE) submits comments to the Bonneville Power Administration (BPA) regarding an issue raised during the implementation of the TC-20 Settlement Agreement about the application of *De Minimis* Impact Dead-Band for Network Flowgates, Version 15 document (the *De Minimis* Document).<sup>1</sup> At the August 6, 2019 workshop, Katie Sheckells solicited comments from stakeholders to better understand the scope of this topic and how many customers are experiencing unexpected impacts. It is PGE's understanding that many transmission customers are in fact experiencing unexpected disadvantageous impacts related to the application (or lack thereof) of the *De Minimis* tests to **all** transmission requests. BPA should therefore prioritize this issue and create a plan to conduct customer workshops as soon as reasonably practical.

The treatment described in the *De Minimis* Document is good policy and should be applied to **all** transmission requests types to avoid imposing unnecessary barriers to granting service that might arise from inconsequential quantities that do not have a meaningful or measurable impact to the system. We respectfully request more transparency around BPA's application of the *De Minimis* Document to better understand this issue.

PGE appreciates BPA's consideration of these comments and looks forward to future discussions with BPA on this topic. By return e-mail, please confirm BPA's receipt of these comments.

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<sup>1</sup> Available at

[https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Documents/deminimis\\_impact\\_dead\\_band.pdf](https://www.bpa.gov/transmission/Doing%20Business/ATCMethodology/Documents/deminimis_impact_dead_band.pdf).