



Portland General Electric
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January 9, 2026

To: techforum@bp.gov

Re: Comments related to BPA's Transmission Rate Case ("BP-26E") December 15, 2025, workshop.

Portland General Electric (PGE) appreciates the opportunity to provide comments to Bonneville Power Administration ("BPA") regarding new EIM Neutrality and Uplift charges and credits discussed at the Dec. 15, 2025, workshop. At that workshop, BPA identified three new charges and credits that would be passed on to customers because of the California Independent System Operator (CAISO) changing their tariff.

Here are PGE's comments regarding the two proposed charges and credits:

EIM Transfer Revenue: Any changes to the BPA EIM entity pursuant to Section 29.11(e)(6) of the Market Operator (MO) Tariff for EIM Transfer Revenue will be sub-allocated to Transmission Customers on the basis of EIM Measured Demand. The CAISO will allocate EIM Transfer revenue to EIM Entity Scheduling Coordinators pursuant to Section 11.5.4.1.5.

- *PGE requests that BPA confirm what (if any) distinction is being drawn between BPA's use of the term "EIM Measured Demand" and "Measured Demand"?*
- *PGE also requests that BPA confirm that suballocation will occur with Load Serving Entities (LSEs) and Transmission Customers with interchange transactions into, out of and through the BPA BAA and make this explicit in a subsequent tariff revision.*
- *As one of BPA's biggest transmission right holders, PGE export and wheel-through transactions contribute significantly to the calculation of Measured Demand.*

Other EIM Neutrality and Uplift charges: BPA clarified that any future changes that CAISO pursues will be suballocated to Transmission Customers on the basis of *EIM Measured demand*. BPA clarified there would be public processes, if and when such event took place.

- *PGE understands the need for BPA to be revenue neutral and that it must pass on charges and credits to customers. However, each proposed change should be run through a formal stakeholder process and not just suballocated to Transmission customers on the basis of EIM Measured demand.*
- *BPA should not bypass the stakeholder process for any rate changes, and PGE would like the opportunity to review even minor changes to double check rate calculations, suballocations, impacts, etc.*

Recommendations:

De-scope the blanket measured demand allocator for EIM transfer revenue:



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- Use a transaction/volumetric base on actual export/import MWh in the settlement intervals (and associated price spreads). Transfer Revenue is created by inter-BAA price differentials and real-time transfers, not by a transmission customers monthly peak load.

Conduct a targeted cost causation study (pre next rate case) for neutrality buckets

- Commit to a published study plan within 60 days—scope, data access, methods, timelines—to evaluate appropriate allocators for Transfer Revenue, Congestion, Marginal Losses, Unaccounted for Energy (UFE), and Other Neutrality.

Publish bucket-level transparency and reconciliation data:

- Provide bucket level dollar amounts for neutrality and uplift (Imbalance, Congestion, Marginal Losses, Transfer Revenue, UFE, Other Neutrality).
- Provide the BAA level allocation bases used (e.g., measured demand MW totals and export MWh for transfer revenue)
- Provide customer level ledgers that enable reproduction of allocations.

Plan for Markets+ settlement alignment without automatic settlement carryover

- When BPA is developing settlement suballocations for Markets+ settlements in BPA's Tariff, commit to it thoroughly evaluating each settlement in the context of Markets+ and collaborate with BPA's transmission customers to ensure the methodologies are fair and equitable.

Summary:

PGE understands the data limitations from CAISO, however PGE does not support BPA's blanket suballocation of neutrality and uplift charges including Transfer Revenue without a formal stakeholder process. The proposal under the MO Tariff Section 29.11(e)(6) prioritizes BPA's revenue neutrality over cost-causation accuracy. This approach theoretically exposes customers with high monthly peak demand to volatile settlement pass-throughs and risks codifying an over-generalized allocation method for fundamentally transaction-driven buckets i.e. Transfer Revenue. Future settlement revisions should involve workshops to discuss the proposed changes, but a formal rate case proceeding is unnecessary for these charge codes.

At this time, PGE is not interested in Settlement unless more conversation can be held on the above proposed rates to find a more neutral ground. PGE appreciates the opportunity to provide feedback and looks forward to future conversations on BP-26E.

Sincerely,
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