

PGE's comments on BPA Transmission Planning Reform

May 6, 2025

AGENDA

- Introduction
- More robust public process
- Define trended load growth
- Conditional Firm
- New Transmission Queue Readiness Requirements
- Limiting Renewal Rights on PTP Requests
- Projects of least regrets
- Closing

PGE at a glance



About us

- Over 900,000 retail customers within a service area of approximately 2 million residents
- Roughly half of Oregon's population lives within PGE service area, encompassing 51 incorporated cities entirely within the State of Oregon
- More than two-thirds of Oregon's commercial and industrial activity occurs in PGE service area
- 16 generating plants, 14 of which are in Oregon; 3,300 MWs
- 30,000 circuit miles of transmission and distribution lines⁽¹⁾
- \$5.5M in charitable giving and 18,000 volunteer hours, with 69% employee participation (2022)
- 2,900 employees across the state of Oregon

PGE supports BPA's Queue Reform efforts



Portland General Electric (PGE) appreciates the opportunity to comment on BPA's Transmission Planning Reform.

PGE supports the overall goal to make major changes in processing the TX queue, i.e. goal is to get from request to service in 5-6 years.

More Robust Public Process

BPA should record all the meetings related to the BPA TX Planning Reform.

Information presented to date, was specific to queue reform, but not planning reform. We would like transparency regarding the timelines, horizon, methodology, etc. on planning assumptions regarding loads and resources.

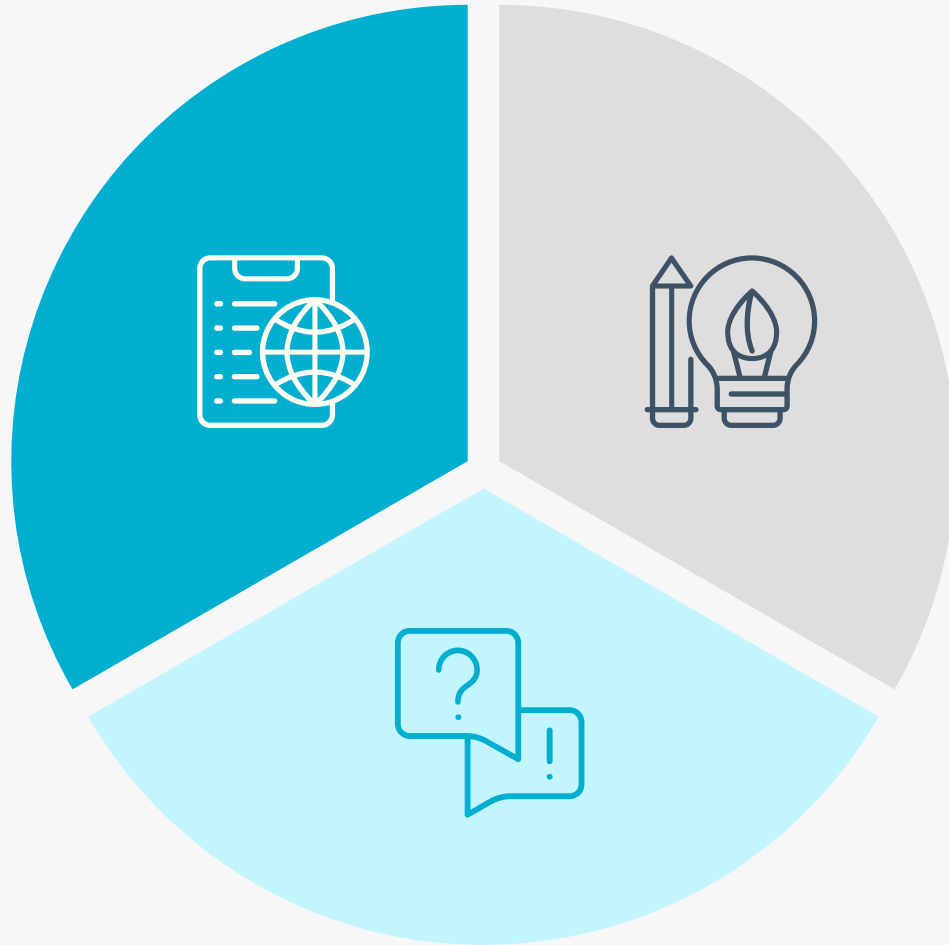
BPA should respond to all comments in writing submitted by customers. In addition, how the proposals are consistent with Open Access, Tariff section 9.

There should be a sense of urgency to get this resolved as expeditiously as possible. Continue with meetings in June and August.

BPA Planning Reform presentations need to spell out proposals in enough detail to understand potential impacts.

Request more time for customer led presentations following workshops. (April 21 to May 5 presentations were due - 2 weeks.

Define Trended Load growth



Demand Proposal

Calls for all "Trended NITS growth will be accommodated by encumbering firm capacity for them."

PGE requests that BPA define "trended," load growth.



Preserving load growth

Concern for NW customers if this includes large new load growth, i.e. data center loads, it jeopardizes the ability to service residential load growth long term.



Holistic approach

PGE wants to ensure all Transmission customers have non-discriminatory access to the transmission grid, per section 6 of the Federal Transmission Act.

Conditional Firm



- Please define in writing the full breadth of options being considered for changing the current CF product? For example, what would be the new system conditions?



- In this alternative, it appears BPA would be changing the terms of service for CF. This alternative would alter the commitments made under the contract and BPA's OATT.



- Under the new proposal, are customers obligated to take a 6NN or a CF product until firm service is available?



- If customers are obligated, and no studies are done to ensure the "reliability of the CFS" it will degrade the firmness of the existing CF product.



- What are the rate impacts of offering unlimited 6NN and CF?

New Transmission Queue Readiness Requirements



Data Exhibit

PGE supports stricter data exhibit requirements (identification of POR/POD, upstream generation sources, etc.) to ensure “real” TSR requests move forward; and clearing the queue with requests that aren’t ready to move forward.



Commitment to make selections

PGE also supports bi-lateral service agreements between buyers and developers.



Request for Proposals Impacts

- BPA’s proposal would impact our existing RFP timelines post 2025 RFP.
- Inform OPUC of potential RFP process and timeline impacts for short list bidders balanced with opportunities to have access at new LTF.

Limiting renewal rights on new PTP Requests

CHALLENGES



PGE does not support alternatives that would limit rollover rights on new PTP requests.



How would all new requests for PTP LTF service be assessed to determine if rollover/ROFR would be offered?

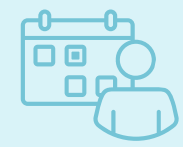


How is this alternative of "evaluating whether new PTP contracts will receive rollover rights," not discriminatory against PTP customers?

If PGE is taking CF bridge service, actively fulfilling all requirements to support a build, and service agreements do not include ROFR, then refunds would be mandatory.

PGE would want to make OPUC aware as it would jeopardize our ability to serve load growth and could have upward rate pressure. PGE would also have to go out and find alternative sources.

Has BPA changed its position adopted in TC-20 to offer open access service and provide transmission products that are modeled, to the maximum extent possible, on the FERC pro-forma tariff?



SOLUTIONS

Projects of Least Regrets



OATT Application: how will the capacity be allocated if it's not tied to the TSR requested amount and first come, first serve when demand exceeds supply?

What is the proposed cost allocation for projects of least regret?

What criteria will BPA use to approve construction of TX expansion projects?

Will there be a stakeholder input into the decision points?

Closing



PGE is looking for predictable and durable transmission service.

PGE wants to ensure all Transmission customers have equal access to the transmission grid.

PGE appreciates the opportunity to provide these comments. Look forward to exploring the answers to the questions posed today in a future workshop or in writing.

**Let's
meet the
future
together.**