



**Portland General Electric Company**  
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**Portland General Electric comments for BPA Southern Intertie Hourly Non-Firm Workshop**

Portland General Electric Company (PGE) appreciates the extension of the opportunity to provide input to Bonneville Power Administration's (BPA) Transmission Southern Intertie Hourly Non-Firm Workshop. As a Point-to-Point (PTP) transmission customer, remote generation owner, and active market participant, PGE has considerable interest in these proceedings. PGE provides these comments, observations on the issues and options for solutions for BPA's consideration.

At the October 14 workshop, BPA requested that customers: 1) identify the top three alternatives of those listed in the presentation; 2) identify the "bottom three" alternatives or those that the customer believes should not be considered; and 3) suggestions of the analyses BPA should perform as part of the alternatives selection.

**The Top Three: Alternatives for further assessment:**

PGE believes that three measured operational solutions outlined in the FTI Issues and Options matrix can provide solutions with varying complexity that may provide relief that some firm rights holders are seeking:

Competition

Release timing

HNF inventory management

However, the most effective solution to this seams issue is for BPA to engage the CAISO in a dialogue that clearly outlines the issues and seeks a collaborative solution to the specific issues. Such a collaborative solution could include a variety of rate and non-rate solutions but prevents increased transactional friction between the two markets.

**Bottom Three: Alternatives that should not be considered:**

PGE does not support limiting the marketing or sale of Hourly Non-Firm transmission on the Southern Intertie until such a time as BPA Transmission has evaluated the less restrictive aspects discussed above.

PGE believes any alternatives that require a rate change will prove detrimental to BPA's current rate processes and that attempting to engage in a rate solution without exhausting non-rate solutions is wasteful.

PGE is concerned that BPA's Southern Intertie is being singled out for special operational treatment. The concerns provided in Issue 1 as presented in the FTI Issues and Options document describes a situation that can happen at any system to system transmission seam where inadequate coordination exists. BPA should focus on correcting those coordination efforts rather than creating new restrictions and rate schedules.



### **Suggested Analyses**

PGE would like BPA Transmission to define its ability to do complete “whole path” analysis of each transmission schedule and define the granularity on the Southern Intertie, as well as all paths that use firm transmission on the BPA transmission system.

PGE recommends that BPA provide an analysis of the congestion and access issues that will likely be the result of proactively limiting firm schedules based on historic data.

While BPA and the parties have engaged in a discussion of the commercial aspects of this issue, PGE encourages BPA to provide a technical session to discuss the reliability and transmission system operational impacts that proactively limiting firm schedules specifically seeks to address.

In summary, PGE appreciates the opportunity to participate with BPA and other regional parties seeking solutions to this important Northwest issue. PGE reiterates its opposition to a specific Southern Intertie rate case prior to exhausting non-rate options. PGE encourages BPA to provide analysis of the non-rate solutions based on historic data and continue to engage the CAISO to ameliorate seams issues. PGE looks forward to continuing regional dialogue on this issue.