



Portland General Electric Company
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Portland General Electric Comments on BPA EIM Transmission Access Initiative

Portland General Electric Company (PGE) appreciates the opportunity to provide feedback on Bonneville Power Administration's (BPA) California Independent System Operator (CAISO) Energy Imbalance Market (EIM) transmission access initiative. As an adjacent balancing authority to the existing EIM, a transmission rights holder on the BPA system, a balancing services customer of BPA, and a future participant in the EIM, PGE has a vested interest in the outcome of this initiative and any future BPA activities related to EIM facilitation.

PGE agrees with BPA that the immediate objectives¹ and deliverables² outlined for this stakeholder initiative have been met. PGE also agrees with the assertion by BPA staff that PGE's EIM implementation in October 2017 does not require process adjustments or assessments beyond those made for Puget Sound Energy or PacifiCorp.

However, PGE believes more can be done over time to maximize the benefits of EIM for the Pacific Northwest. To that end, PGE would like to identify a forum in which to continue to collaborate with BPA and its regional counterparts on ways to enhance the efficiency and reliability of the facilitation of EIM transfers on the BPA system as new tools and capabilities allow.

Specifically, PGE would like to work with BPA staff and stakeholders to develop a roadmap for continuous improvement in the operation and efficiency of the BPA system as related to such areas as: effectiveness of existing flowgate management tools, establishment of variable transfer limits, assessment of available transfer capacity, curtailment and re-dispatch practices, maximization of the value of data sharing and visibility between EIM participants, the CAISO, and BPA, and other adjustments to operations and control frameworks identified in future stakeholder meetings as necessary to respond to changing market and system conditions.

PGE appreciates the opportunity to submit these comments and looks forward to continuing to partner with BPA and its customers to maximize the benefits of market evolution for the region.

Kindest Regards,

A handwritten signature in blue ink that reads "Shawn P Davis". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

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¹ Build understanding of EIM participant transmission use; identify and manage risks for near-term EIM participant transmission use; inform future planning and proceedings through a transparent process; develop policies on the use of federal transmission for intra-hour operations; and consider the issues on an integrated, rather than case-by-case basis.

² Articulate a control framework and plan for monitoring and improvement; validate effectiveness of EIM control framework; and maintain a transparent set of rules for customers to use their transmission rights for EIM participation.