



Transmission Services

**Customer Comments on the BPA
Stakeholder Meeting addressing the
PAC-CAISO Energy Imbalance Market**

February 20, 2014

Comments Received from
Portland General Electric

March 7, 2014

Posted March 21, 2014



Portland General Electric Company
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March 4, 2014

To: Bonneville Power Administration, Tech Forum
RE: Portland General Electric Comments for BPA PAC-CAISO Stakeholder Meeting

Portland General Electric Company (PGE) commends Bonneville Power Administration (BPA) on the continuing efforts to keep regional stakeholders informed of the PacifiCorp-California Independent System Operator Energy Imbalance Market (EIM) as it pertains to BPA Transmission customers. PGE appreciates the complexity of the issues that need to be resolved to ensure seamless transition of a large balancing authority into the proposed EIM. PGE would like to suggest the following items for further consideration and feedback.

- PGE and other stakeholders in the meeting voiced the expectation that all parties receive data identical to that provided to the EIM market operator. Specifically, the data germane to BPA system and flow gate operations must be made available to other EIM efforts and balancing authority operations.
- PGE expects that when BPA refers to development of historical variable transfer limits, any such development will take place amongst all owners of the affected paths. In particular, PGE is concerned with development of dynamic transfer limits on the California-Oregon Intertie and access to such capability. PGE also proposes that consideration of internal BPA transfer path limits include a public process that allows all Federal Columbia River Transmission System (FCRTS) stakeholders to participate. CAISO representatives stated the expanded full network model studies will take some time to complete. PGE is supportive of all uses of the studied paths and not prejudicial to any one use or user.
- With regards to internal flow gate (MOD 30) path usage, it is unclear if the allowed upper and lower flow limits for BPA internal paths will only include PacifiCorp facilities or if the limits will also include other Northwest Utility generating facilities dynamic flow gate path usage. In the case of the former, PGE recommends that any analysis should include all uses of the path either historical or proposed and queued at this time. If the latter is the case, PGE requests clarification on how changes in Power Transfer Distribution Factors will be studied with respect to changes in generation and dispatch patterns as a result of anticipated increases in variable energy transfers within the BPA system and proposed changes in the PacifiCorp generating facility usage.

- Finally, while sensitive to the timing issues surrounding the PAC-CAISO EIM, PGE recommends that any changes to BPA internal flow gate path usages or BPA business practices be given sufficient time to be vetted by all users of the FCRTS.

PGE appreciates the opportunity to comment on BPA EIM Stakeholder meeting held on February 20, 2014. PGE looks forward to BPA's next meeting and the response to PGE's concerns expressed above.

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