Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

January 12, 2017

Portland General Electric Company Responses to BPA Tariff Engagement Design Questionnaire

Portland General Electric Company (PGE) appreciates the opportunity to provide input to Bonneville Power Administration (BPA) regarding the proposal to make changes to its Open Access Transmission Tariff (OATT). As a transmission customer on the BPA's transmission system, PGE has considerable interest in updates to BPA's OATT. In keeping with the request by BPA during the January 8, 2016, public meeting, PGE provides these answers to the questionnaire.

1. Based on the presentation on December 13th, are there particular topics or questions you would like BPA to include either in the January 17th or February 22nd workshops or in a separate mini-workshop that BPA would schedule?

   PGE would prefer topics on the following:

   i. **Please describe the process by which BPA will determine the impact of any proposed OATT changes in the new process. Are there metrics that BPA intends to use?**
   ii. **Describe in additional detail how BPA will ensure that the process for determining OATT changes is open, transparent and independent.**

2. Which, if any, of the three straw proposals presented on December 13th do you prefer BPA to adopt? Should any of the proposals be eliminated from further consideration?

   PGE suggests eliminating the case-by-case proposal. PGE's preference is a scalable process, with assurance that a formal process will be used for certain types of tariff modifications.

3. Are there specific elements to the three proposals, or other proposals, that BPA should consider and discuss at a future workshop?

   PGE asks BPA to provide detailed information on the following:

   i. **Specific metrics BPA may use to determine if a change requires a formal process.**
   ii. **Any value BPA could perceive from using the IPR/CIR process to inform and influence changes to the BPA OATT.**
   iii. **BPA should provide a detailed example of what to expect from a scalable process.**

4. Are there alternative proposals for the public process that BPA did not present today that BPA should consider and discuss in a future workshop? Would you be interested in presenting the proposal to customers and stakeholders in a workshop?

   PGE has no suggested alternative proposals.

5. If BPA adopts the Scalable process, what criteria would be appropriate to determine if a proposed revision to the BPA tariff requires a more formal process, such as a mini-7(i)?

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PGE suggests that BPA propose criteria (with examples) that it believes would be appropriate to determine the level of process given to different types of proposed tariff changes.

6. Should BPA consider using different public processes for revising different sections of the BPA tariff? For example, should BPA use a more formal public process for revisions to specific sections of the BPA tariff and use a less formal process for revisions to all other sections? If so, which sections warrant the more formal process?

   No, PGE does not believe it would be appropriate to determine the level of process based on the sections of the BPA tariff affected by the proposed changes.

7. Would a process similar to the BPA business practice process suffice for minor revisions to the BPA OATT? (post for comment for 20 business days, respond to comments by posting comment/response, post final decision, use Tech Forum emails to communicate) If so, what do you consider a minor revision?

   PGE proposes a 30 day review period for minor tariff revisions, and suggests that BPA should not only accept comments during that period, but also include provisions for escalating the level of process to include a more robust stakeholder process under certain conditions.

8. Should customers or stakeholders be able to propose revisions to the BPA tariff? Should BPA adopt a threshold or criteria for bringing customer or stakeholder proposed revisions through the public process?

   PGE has no position on this issue.

9. What is the best method for communicating any proposed revisions to the BPA tariff to you or your organization? (Tech Forum email announcement, external website, AE contact, executive contact, etc.)

   PGE believes that formal announcement and communication to all transmission customers is a cornerstone to open access. BPA should retain a formal announcement process.

10. Should BPA adopt a set schedule for conducting the public process? If yes, would you prefer BPA conduct a public process for tariff revisions every year, every two years, or another schedule?

    PGE preference would be a set schedule for adopting changes that is offset from BPA's ratemaking process. PGE believes that it is reasonable to provide a set schedule and process to ensure that all customers are engaged in this process. Additionally, such a schedule provides for certainty and predictability with border transmission entities.

11. Should we consider other BPA or regional processes when selecting a schedule? For example, if BPA adopted a revision process for the BPA tariff that occurred every two years, would you like the process to run concurrently with the BPA Rate Case or on the off year?

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PGE prefers off year schedules to allow better opportunities to engage technical staff.

12. Should participation be limited during the public process? For example, should the public process be limited to BPA transmission and interconnection customers?

    PGE has no position on this issue.

13. What form of resolution process would you be looking for should customers and/or BPA disagree on an issue?

    PGE has no specific position on this issue, but feels that an important part of this process is for BPA to identify the existing processes that would apply when customers disagree with BPA on a tariff change, and to develop appropriate processes if there are not existing avenues to seek resolution in these circumstances.

14. Do you have any suggestions on how BPA can improve the Tariff Engagement Design effort?

    PGE believes that BPA should not rush to any conclusion in the Tariff Engagement Design effort. PGE suggests that BPA take strides to ensure sufficient public process and regional consensus before enacting any changes. This will provide the region with a predictable and certain process to which stakeholders have agreed.

PGE appreciates BPA's outreach on this issue and willingness to engage the region in consensus building dialogue. PGE looks forward to continued participation in this matter.

Shawn Davis
Portland General Electric Company
121 SW Salmon St. 3WTC0306
Portland OR 97204
Phone: 503/464-2171