



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

September 19, 2018

**Portland General Electric comments for BPA Business Practices:**

**Reservation Priority; Redirects; and Partial Long-Term Firm Service**

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) various business practice changes. As a Point-to-Point (PtP) transmission customer, remote generation owner, and active market participant, PGE has considerable interest in these business practices. With this document, PGE hereby provides recommendations for consideration and comment on the following proposed revisions to BPA's business practices.

**Reservation Priority, Version 11 and Partial Long-Term Firm Service, Version 12**

PGE is concerned that the primary changes to these business practices diminish a customer's rights to receive reservation priority. The previous version of the Reservation Rights Business practice allowed Reservation Priority on reservations of 5 years or more. This business practice revision merely requires BPA to consider whether a request of 5 years or more will include reservation priority. Such a change in business practice wording is effectively changing the terms of contracts already in place.

The same concerns apply to the revisions to the Partial Long-Term Service. With the proposed edits, BPA effectively diminishes expected rollover rights to a mere "rollover consideration". When these contracts were executed for the 5-year term, rollover rights were included. This business practice revision is a unilateral change to the agreed upon terms.

Removing rollover or reservation priority from the terms of these contracts is a concern for PGE, a significant customer of BPA long-term firm transmission. PGE has purchased long-term contracts to ensure access to our generation resources located within BPA's BA. Without guarantee of these rollover rights, PGE risks stranded generation.

PGE requests that BPA provide detail for the consideration it intends to apply to Reservation Priority and the metrics that will determine whether Reservation Priority will be granted. Long-term firm customers need a way to anticipate the Reservation Priority associated with a 5+ year transmission commitment.

**Redirects, Version 24**

PGE requests BPA clarify that under Section C.2, a TSR that holds Reservation Priority rights and is redirected more than 12 months prior to the termination, unless waived as specified, the Reservation Priority rights are transferred to the redirected TSR. Please clarify whether this Business Practice allows the Customer to choose whether Reservation Priority is attached to the parent or the redirected TSR.



PGE appreciates the work that BPA puts into creating high quality business practices and the willingness to allow customers to participate in that process. PGE requests a review of the comments provided above and looks forward to BPA's clarifying remarks.

**Tina Gary** |

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