



Transmission Services

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# **Customer Comments on Tariff Automation Efforts**

**Comments Received from  
Portland General Electric  
June 8, 2012**

**Posted July 6, 2012**

**PGE Comments on BPA Tariff Compliance Automation Program (TCAP)**

Portland General Electric (PGE) appreciates the opportunity to comment on BPA's Tariff Compliance Automation Program (TCAP) that was proposed at its customer workshop on May 16, 2012. PGE suggests that BPA take into consideration the importance of a fully vetted planning process that includes enough lead time and communication to their customers so they can coordinate and prepare for any imminent changes to their respective systems and processes.

**Posting of Equivalent ATC**

PGE is supportive of BPA's move towards converting its AFC/TFC values to ATC/TTC values for its flowgate methodology and suggests that BPA posts the information on OASIS in the Offerings module consistent with common industry practice. This automation effort will enable BPA's customers in confirming transmission capacity availability, while providing more concrete information regarding the correlation of transmission derates to impacts on the respective flowgates. In addition, converting the ATC/TTC values allows for ITAP subscribers to utilize the automated scheduling functionality of the system and for transmission acquisition through the ITAP system.

Based on the presentation given at BPA's customer meeting on May 16, 2012, PGE would like to know if the list of POR/POD combinations which meets the definition of "posted paths" for ATC/TTC calculation would be made available to customers prior to testing. Would the POR/POD combination be similar to what is posted on your short term PTDF calculator? Will the testing period, proposed in the November-February schedule include external testing with BPA's customers?

**Conditional Firm Resales and Redirects**

PGE has concerns with the proposal of conditional firm resales and redirects when the parent transmission service request (TSR) is not "firmed up". Is BPA considering allowing resales and redirects from non - firm parent transmission service? As we currently dive into the complexities of preemption and short term competition, specific to the impacts of resales and redirects, PGE requests BPA move this automation effort to be included at the discussions held at the NAESB level?

**Non-Firm Products Daily, Weekly, Monthly**

PGE would like confirmation that should these products become available, that BPA's practice of pro-rata curtailment and its use of its curtailment calculator will take into account the NERC priority codes when reliability limits are set in place or when BPA is exceeding their system operational limits. Further, PGE requests that BPA accept currently available transmission products utilized by other Transmission Providers rather than attempting to provide products that are specific to BPA.

**Simultaneous Submission Windows (SSW)**

PGE prefers a fixed time frame for the SSW rather than a rolling start and would be supportive of the proposed five minute window for firm transmission service products. In respect to the allocation options suggested by BPA, PGE is in favor of the lottery process to be able to obtain a full granting of a transmission service request under a constrained situation. PGE would request that BPA stick to the requirement as per FERC 890 and keep the SSW requirement for firm transmission only. In respect to the suggestion by BPA of splitting the hourly firm market to 09:00 and the hourly non-firm market at 10:00, PGE is supportive of this change.