

4/8/2011

Transmission Services
Bonneville Power Administration
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Portland General Electric Company (PGE) objects to BPA's proposed modification to Appendix C of existing LGIAs on the same grounds as set forth in PGE's March 11, 2011 Comments on the Administrator's Draft Record of Decision on Environmental Redispatch and Negative Pricing Policy. BPA does not have the right to unilaterally modify existing LGIAs. The Federal Energy Regulatory Commission has expressly acknowledged that the "...Interconnection Customer does have the right to agree to modifications to the agreement," *U.S. Dep't of Energy, Bonneville Power Admin.*, 112 F.E.R.C. ¶ 61,195, at paragraph 20 (2005.). PGE does not agree to the proposed modification.

In addition, PGE notes that BPA has allowed only four days to comment on the proposed change. This significantly deviates from BPA's posted Business Practice Development procedures which state that "[w]hen the business practice is complete and has received internal approval, it is posted for Customer comment for a period of 20 Business Days." PGE requests that BPA delay moving forward with this improper LGIA modification and all other practices implementing its Environmental Redispatch and Negative Pricing Policy to allow more time to work collaboratively with stakeholders on the overgeneration issues underlying the policy.