



April 8, 2011

Bonneville Power Administration Portland, OR 97208-3621

Subject: PPL Companies Comments on Bulletin - Attachment C of LGIA modification relating to Environment Redispatch and other Dispatch Standing Orders, posted April 5, 2011

PPL EnergyPlus, LLC and PPL Montana, LLC (“PPL Companies”) appreciate the opportunity to submit comments on the draft of modifications proposed for Attachment C of LGIA relating to Environment Redispatch and other Dispatch Standing Orders, posted by BPA on April 5, 2011. The PPL Companies have an interest in this proceeding because they generate or market electric generation in the Pacific Northwest and have an LGIA request for the Thompson Falls hydro-generation facility (a run-of-the-river facility) into the BPA Balancing Authority (BA).

The PPL Companies previously submitted comments concerning the Draft Environmental Redispatch and Negative Pricing Record of Decision and the proposed Business Practice on Environmental Redispatch (ER). We urged BPA to delay implementing its proposal pending a full analysis of the economic and legal issues and further discussions with stakeholders. As the PPL Companies explained, BPA has proposed to fundamentally alter the rights of interconnected generators and transmission customers on its system without fully analyzing the grave negative consequences of its decision in the region. Accordingly, the PPL Companies urged BPA to suspend its proposed revisions to Attachment C of the LGIA and work with market participants to find a better solution and to avoid the numerous economic and legal issues raised by the proposal.

Following are the PPL Companies additional comments on BPA’s proposed modifications to Attachment C of Draft Business Practice for Environmental Redispatch:

- 1) Generators subject to the proposed modifications to Appendix C of the LGIA: BPA states that the proposed modifications will be included in all future LGIAs.
 - a. The PPL Companies request BPA to clarify that all federally licensed hydroelectric projects interconnected to the BPA Control Area (Balancing Area) and subject to a Large Generation Interconnection Agreement will be exempt from the proposed modification. All such hydroelectric facilities should be exempt for the very reasons that BPA must declare an Environmental Redispatch (ER) event. In particular, run-of-river hydro should not be subject to ER which would result in additional spills at the non-BPA hydro projects. All federally licensed hydro projects must be

operated to meet FERC license requirements and many of the same environmental requirements which BPA is required to meet.

This is an extremely important topic to the PPL Companies. BPA's posting was first available late in the day on Tuesday April 5 and comments are requested by today, Friday April 8. Much more time should be allowed by BPA for review, consideration, and comment. The PPL Companies request that BPA withdraw its proposed modifications to Appendix C of its LGIA.

Thank you for the opportunity to comment.