



June 4, 2015

Portland General Electric comments for BPA Business Practices

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) changes to the Balancing Service Election for Dispatchable Energy Resource Balancing Service (DERBS) and Variable Energy Resource Balancing Service (VERBS) Version 3 business practice. As a VER owner and VERBS customer, PGE has considerable interest in this business practice. With this document, PGE hereby provides recommendations for consideration and comment on BPA's proposed revisions to the business practice.

Section A, Election Date

- 1) Based on discussion during the May 22nd customer conference call, PGE suggests that BPA incorporate language in this Section that indicates BPA will send a notice to customers reminding them of the upcoming election deadline.
- 2) PGE suggests that BPA expand the language in Part 5 to include the option for customers to revise their election if the rate schedules included in a rate case Record of Decision have rates that differ from BPA's proposed rate schedules under which customers based their service election. PGE is open to discussing a threshold level of change that could be used as a trigger regarding whether or not customers should be able to revise their election.

Section D, Submitting a Balancing Service Election

- 1) PGE requests that the business practice be modified to use one method for submitting balancing service elections. The proposed edits to the business practice incorporate a link to a Service Election form, but the business practice references this form only for mid-rate period elections (see Section E) and states that the form should be submitted to techforum@bpa.gov. Section D indicates that balancing service elections should be submitted via email to a customer's Transmission Account Executive and the email should contain the information listed in the business practice. PGE finds that using different methods for submitting elections is cumbersome and may cause confusion. PGE suggests that all balancing services elections should use the Service Election form and be submitted to techforum@bpa.gov.
- 2) PGE requests clarification regarding the binding nature of a balancing services election and the ability to change an election prior to the April deadline. During the May 22nd customer conference call, representatives from BPA stated that balancing service elections are not final until the April deadline and may be changed up to that deadline, regardless of whether the election is for a mid-rate-period or beginning of the next rate period. If this is the case, PGE requests that BPA add language to Section D similar to the language contained in Section E, Part 5 regarding a customer's ability to change its election prior to the April deadline.



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.

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