

## **Portland General Electric comments for BPA Committed Scheduling for the 2014-15 Rate Period, Version 4,**

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) business practice "Committed Scheduling Business for 2014-15 Rate Period Version 4". PGE values the investment BPA puts into creating innovative operating business practices for integration of variable energy resources. As a Variable Energy Resource Balancing services (VERBs) and Point to Point (PtP) transmission customer, PGE has considerable interest in flexible options for the integration of variable resources on BPA's system. PGE provides the following recommendations for consideration.

1. PGE notes that section A.2 "The wind facility must also comply with BPA's Technical Requirement for Interconnection to BPA Transmission Grid, specifically section 12.2.2 Data Requirements for Balancing Authority Area Services" should be modified or stricken from the business practice. Bonneville appears to be using the business practice to unduly discriminate against Variable Energy Resources that take integration service from BPA under Large Generator Interconnection Agreements (LGIA's) issued prior to FERC Order 764 and 764-A. Leaving section A.2 in the business practice puts the burden on existing LGIA customers not required to provide such data under FERC Order 764/744-A if non-compliance constitutes removal from the program even if that resource has been a foundation member of the program.

Should BPA desire to keep the language in the business practice, PGE suggests the following change to ensure compliance with the language and spirit of the Commission's determination in Order 764-A Section B. "Any newly commissioned ~~The~~ wind facility must also comply with BPA's Technical Requirement for Interconnection to BPA Transmission Grid, specifically section 12.2.2 Data Requirements for Balancing Authority Area Services"

This change makes it clear that the data requirement applies solely to new facilities and specifically exempts those facilities that already have exiting LGIA's with Bonneville. To do otherwise would fly in the face of the Commission determination and be unduly burdensome and discriminatory to participating wind facilities or those wind facilities desiring to participate in the Committed Scheduling for 2014-15 Rate Period, Version 4, Business Practice but have LGIA's that predate order 764/764-a.

2. Section C.3, which reads "Committed Scheduling Resources are exempt from Persistent Deviation penalties for Generation Imbalance ~~provided~~ if they meet their scheduling metrics", could lead to confusion for participants of the Committed Scheduling business practice. Section III B.2.c of BPA's 2014 Transmission, Ancillary, and Control Area Service Rate Schedules and General Rate Schedule Provisions (FY2014-2015) states; "Customers participating in committed scheduling to receive (i) BPA's 30-minute signal for each 15-minute schedule period (30/15 committed scheduling), each 30-minute schedule period (30/30 committed scheduling), or each 60-minute schedule period (30/60 committed scheduling), or (ii) BPA's 40-minute signal for each 15-minute schedule period (40/15 committed scheduling), and that submit schedules that are consistent with or result in less imbalance for the committed scheduled period are exempt from the Persistent Deviation penalty charge.

It is unclear to PGE if a participant in the Committed Scheduling Business Practice is exposed to Persistent Deviation penalties for each instance in which it did not meet the scheduling metrics, or if the Persistent Deviation penalties would be levied upon removal from the list of qualified Committed Scheduling Resources. Given the appeals process incorporated in the business practice and the ability of BPA to (at its sole discretion) waive scheduling metrics for a variety of reasons PGE would

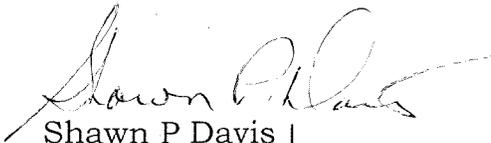
suggest the latter interpretation to be applied. This interpretation provides rate certainty as well as prevents needless post waiver accounting corrections for BPA and its transmission customers.

If BPA's intent is to penalize resources that fail to meet the scheduling metrics and are disqualified as Committed Scheduling Resources, then PGE suggests a slight language revision. That revision might state "Committed Scheduling Resources are exempt from Persistent Deviation penalties for Generation Imbalance ~~provided if they meet their scheduling metrics~~ maintain their status as a qualified Committed Scheduling Resource".

3. PGE believes that section H.3 and H.4 create significant ambiguity as to when a Committed Scheduling Resource customer will potentially be exposed to direct assigned changes under Section III.E.6.2 of BPA's ACS-14 Rate Schedule. H.4.a states "the Participant fails to convert to automated scheduling of the BPA-provided persistence value within two weeks of receiving the new signal from BPA" and yet H.3 states "Upon receipt of a notice with this requirement, the committed scheduling participant must notify BPA within five Business Days of its intent to comply and complete the change in its scheduling systems within 30 calendar days of receiving BPA's new signal providing the persistence value". These two passages lead to confusion with regards to when direct assigned charges would apply.

PGE recommends a slight change to section H.4.a to read "the Participant fails to convert to automated scheduling of the BPA-provided persistence value within the agreed upon timeframe established in H.3". This language allows for flexibility for both BPA to provide the signal and for the Committed Scheduling Resource to develop an effective plan for instituting automated scheduling.

PGE believes that these small changes provide significant clarity to BPA's intent and needs with regard Committed Scheduling Resources. PGE looks forward to BPA's clarifying comments on our suggested revisions.



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