



Establishing Minimum Generation Levels and Maximum Ramp Rates for Oversupply, Version 2

Response to Customer Comments

Posted: April 2, 2013

This document contains the Transmission Customer comments and Transmission Services' response to those comments for the Establishing Minimum Generation Levels and Maximum Ramp rates for Oversupply, Version 2, Business Practice posted for review from March 4, 2013 through March 15, 2013.

Thank you for your comments.

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Portland General Electric Company (PGE) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) proposed revisions to the Establishing Minimum Generation Levels and Maximum Ramp rates for Oversupply version 2. PGE understands and appreciates the challenges associated with integration of large amounts of variable energy resources into the BPA control footprint and the need to maintain reliable bulk electric system operations

PGE would like to suggest that remote generation located within Bonneville Power Administration's Balancing Area Authority that operates under a pseudo tie agreement be specifically excluded from this business practice. With recent consolidation and simplification of business practices PGE is concerned that it is unclear how pseudo-tied resources are to be handled according to this business practice. Without this exclusion, pseudo-tied resources may be inappropriately requested to reduce generation. Specifically, PGE would like to suggest the following change to Section B.1;

"A minimum generation level and a maximum ramp rate for Oversupply Management shall be established for all non-VER generators with 3 MW or greater nameplate generating capacity in BPA's BAA except those generators operating and scheduling output under a Bonneville Transmission Services pseudo tie agreement. If no minimum generation level is established, BPA will assume the minimum generation level is zero."

PGE understands the difficulties in developing and monitoring the various business practices that BPA must administer. PGE appreciates the opportunity to comment on the proposed revisions to Establishing Minimum Generation Levels and Maximum Ramp Rates for Oversupply business practice.

Transmission Service's Response

BPA agrees with PGE's recommendation to exclude generation that operates under a pseudo tie agreement and will include the proposed change.