

Portland General Electric comments for BPA Failure to Comply Charge, Version 9,

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) business practice "Failure to Comply Charge, Version 9". As a Point to Point (PtP) transmission customer and remote generation owner, PGE has considerable interest in this business practice. PGE provides the following recommendations for consideration.

1. PGE notes that section B.3.a is unclear whether increasing current schedules are considered replacement schedules according to the business practice. Specifically, PGE is uncertain if the revised business practice requires increases in schedules to state the curtailed tag in the Reason field. It is PGE's belief that providing a section for replacement schedules and a separate section for increasing current schedules will provide needed clarity for generators to ensure compliance with the business practice.
2. PGE is concerned that section B.3.a could be confusing with respect to a generator's ability to schedule sub-hourly according to BPA's Scheduling Transmission Service Business Practice. A slight change to the wording in B.3.a such as "For a scheduling interval ~~an hour~~ when a resource, subject to a curtailed tag, has designated non-curtailed replacement scheduling, when the sum of those replacement schedules are greater than or equal to the sum of the amounts that are curtailed, then the stated curtailment will not generate an FTC Calculation"

PGE appreciates the work that BPA puts into creating its transmission service business practices. PGE requests a review of the suggested modifications provided above and looks forward to BPA's clarifying comments.



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