



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

March 2, 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) the following proposed business practice changes: Scheduling Transmission Service; Requesting Transmission Service; and Preemption of Short-Term Requests and Reservations. As a Point-to-Point (PtP) transmission customer, remote generation owner, and active market participant, PGE has considerable interest in these business practices and hereby provides recommendations for consideration and comment.

Scheduling Transmission Service, Version 17

- 1) PGE was disappointed that BPA did not provide comment period on this business practice. However, PGE does understand that changes were relatively minor and time sensitive due to upcoming spring operations.
- 2) PGE appreciates the clarification of the billing credit provisions for supply of Third Party and Supplemental balancing reserve products.

Preemption of Short-Term Requests and Reservations, Version 2

- 1) PGE commends BPA for the continued regional leadership in the NAESB process referenced in this business practice. However, PGE is concerned about the reference note in A.6 because PGE is of the understanding that the NAESB working group continues to discuss this item.

Requesting Transmission Service, Version 4

- 1) PGE has no comments on this update to the business practice, but appreciates the opportunity.

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.

A handwritten signature in black ink that reads "Shawn P Davis".

Shawn P Davis |

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