

Portland General Electric comments for BPA Unauthorized Increase Charge, Version 2,

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) business practice "Unauthorized Increase Charge, Version 2". 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 "If a waiver or reduction is granted, BPA Customer Billing will issue the Customer an appropriate credit" does not include a timeline for response from BPA to the customer requesting the waiver. It is PGE's belief that providing an expected response time reduces repetitive requests to Account Executives and establishes a timeframe expectation for the business practice. PGE suggests a change similar to; "If a waiver or reduction is granted, BPA Customer Billing will issue the Customer an appropriate credit at the next billing cycle."
2. PGE is concerned that BPA chose to remove the examples in Section C in the new version of the business practice. BPA's business practices have traditionally included specific operating cases that provided situational understanding for transmission services customers. PGE has found these examples to be helpful. PGE suggests BPA continue to include examples in the Unauthorized Increase Charge, Version 2 business practice. For efficiency, PGE recommends BPA provide fewer examples in the business practice rather than complete removal.

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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