



**BPA's Coordinated Transmission Agreement  
Public Generating Pool Comments  
December 23, 2016**

The Public Generating Pool (PGP) represents ten consumer-owned utilities in Oregon and Washington, three of which own and operate Balancing Authority Areas (BAA)s. PGP appreciates the opportunity to comment on BPA's Coordinated Transmission Agreement between the California ISO and BPA that was discussed on December 2<sup>nd</sup>, 2016.

PGP commends BPA for this effort. BPA took active steps to ensure reliable operations of its transmission system and that existing BPA transmission customers are not harmed by the expansion of the ISO's Energy Imbalance Market (EIM). PGP appreciates that BPA began engagement with the CAISO, EIM Entities and regional stakeholders early in the process to ensure workable solutions prior to the EIM going live.

**Coordinating Committee**

The Coordinated Transmission Agreement establishes a Coordinating Committee made up of BPA and CAISO representatives that meet to identify and resolve any issues with the Agreement and discuss potential additions or revisions to the Agreement. PGP requests that the Agreement add a provision that enables BPA to invite other impacted entities to observe or participate in the Coordinating Committee meetings in the event there are reliability or cost issues that could impact BPA customers/stakeholders.

**Data Exchange and Operational Controls**

The provisions regarding data and information exchange have been instrumental in providing BPA with greater visibility of EIM flows and situational awareness. BPA developed rate of change constraints to ensure the changes in dynamic flows caused by the EIM do not negatively impact the reliable operations of BPA's system and that the variable transfers do not negatively impact existing dynamic transfer capability (DTC) and usage. PGP appreciates the formalization of this work in the Coordinated Transmission Agreement.

**Congestion Management**

PGP supports BPA's efforts to develop tools, processes and procedures in coordination with the ISO that improve BPA's ability to manage congestion on its transmission system. The enhancements outlined in the Coordinated Transmission Agreement provide a clear path forward for such improvements. PGP looks forward to seeing those provisions fully implemented.

In closing, PGP would like to thank BPA for engaging its customers throughout this process. PGP is pleased with the outcome of these efforts and thanks BPA for a job well done.