



Portland General Electric
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Portland General Electric Company
Comments for BPA Queue Management: Rollover presentation

Portland General Electric Company (PGE) appreciates the opportunity to provide input to Bonneville Power Administration (BPA) regarding the proposed changes to the BPA Queue Management and Rollover policies presented at the February 21st 2018 PFGA-Tariff Customer Meeting. As a Transmission Customer of BPA, PGE has considerable interest in updates to the BPA Rollover policies.

PGE supports BPA's efforts to better manage the transmission service queue. A better managed BPA queue will benefit customers by removing uncertainty when acquiring long-term transmission service in a reasonable time frame. In general, the proposal to base the Right of First Refusal (ROFR) on contract term rather than the request term is appropriate.

PGE has concerns, however, regarding the potential impacts to transmission customers with the proposed rollover policy changes. PGE recognizes and appreciates BPA's desire to align ROFR offers with the BPA tariff, but this must be done while maintaining the ability for customers to request and acquire long term transmission contracts. Changes to the BPA business practices or tariff should not be made for the sole purpose of clearing up the transmission queue without also providing benefits to customers. The queue provides a useful tool for transmission providers to measure, price, and prioritize transmission system upgrades. PGE is concerned that BPA is utilizing a metric of a clear queue as a successful planning and open season process. BPA should instead focus on business practices and tariff policies that provide clear benefits to customers.

PGE is concerned about the impact of eliminating the remainder policy as described in the Pro Forma Option on slide 5 of the presentation. The existing remainder practice allows customers to accept an offer from BPA for a portion of their requested service while maintaining queue position for the unmet capacity, should additional capacity become available. Eliminating the remainder process forces a customer out of their queue position when BPA has not provided the requested service and allows a customer lower in the queue to receive any additional capacity that comes available rather than the customer whose needs have not yet been met.

PGE appreciates the opportunity to participate with BPA and other regional parties when addressing changes to the BPA tariff and business practices, and looks forward to continuing dialogue on this matter.

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