

August 14, 2024

Via Email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: TC-26 - Comments of Portland General Electric Company, on the July 30 FERC Order 881 Transmission Line Ratings

Portland General Electric Company (“PGE”) hereby respectfully submits that Bonneville Power Administration (“BPA”) should reconsider deviating from the Federal Energy Regulatory Commission’s (“FERC”) Order No. 881 (“Order”), align with what will be standard utility practice following implementation of the Order, and provide ambient adjusted Total Transfer Capability (“TTC”) values in compliance with the Order for jointly owned transmission paths where BPA is the path operator. While PGE appreciates the opportunity to submit comments to BPA, it is important to note that in this proceeding, PGE is commenting not as a customer of BPA taking service under BPA’s Tariff, but as a co-owner of certain transmission paths in the Northwest that BPA operates pursuant to longstanding contractual obligations.

PGE reiterates that as BPA is the path operator of the jointly owned transmission paths with PGE and currently provides TTC values for those jointly owned transmission lines, BPA’s actions as the operator of these paths directly impacts PGE’s compliance with the Order. On July 30, BPA explained that after considering PGE’s June 6 comments in this proceeding, BPA will not provide TTC values that are ambient adjusted and compliant with the Order, which would put BPA’s path ratings out of line with the rest of the Northwest and the industry generally. PGE again requests that BPA provide the required and industry standard forecasted hourly ambient adjusted ratings 240 hours into the future in accordance with standard industry practice.

As the path operator, BPA calculates the TTC for the jointly owned paths and provides PGE its share of the TTC for All Lines in Service (ALIS) and outage conditions as part of the operating agreements for such paths. BPA’s disposition towards complying with the Ambient Adjusted TTC Ratings will impact PGE’s ability to provide its transmission customers the hourly transmission capacity of its share of the jointly owned transmission scheduling paths operated by BPA, as required by FERC.