

June 6, 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 May 22 FERC Order 881 Tariff Proceeding Presentation

Portland General Electric Company (“PGE”) hereby respectfully submits that Bonneville Power Administration (“BPA”) should provide TTC values in compliance with FERC Order No. 881 (“Order”) for jointly owned transmission paths where BPA is the path operator. It is PGE’s understanding that BPA has indicated it will take into account comments submitted on topics addressed in the May 22 Tariff Proceeding Presentation. While PGE appreciates the opportunity to submit comments to BPA and looks forward to working with BPA on this matter, 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.

On December 16, 2021, the Federal Energy Regulatory Commission (“FERC”) issued the Order, which requires transmission providers to implement ambient adjusted ratings on all transmission lines to improve the accuracy and transparency of transmission line ratings. The final rule also requires that transmission owners calculate both real-time AARs and forecasted hourly AARs 240 hours (10 days) into the future.

As BPA is the path operator of the jointly owned transmission paths with PGE and currently provides Total Transfer Capability (“TTC”) values for those jointly owned transmission lines, BPA’s actions as the operator of these paths directly impact PGE’s compliance with the Order. On May 22, BPA explained that it does not plan on providing TTC values that are compliant with Order 881, which would put BPA’s path ratings out of line with the rest of the Northwest. PGE requests that BPA provide forecasted hourly AARs for the required (and now industry standard) 240 hours into the future.

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 240 hours of hourly 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.