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July 25, 2018

Via E-mail

Public Utility Commission of Oregon

Attn: Filing Center

201 High St. SE, Suite 100

Salem, OR 97301

Re: In the Matter of the Complaint of BLUE MARMOT V LLC, BLUE MARMOT VI LLC,
BLUE MARMOT VII LLC, BLUE MARMOT VIII LLC, BLUE MARMOT IX LLC,
against PORTLAND GENERAL ELECTRIC COMPANY
Docket Nos. UM 1829, UM 1830, UM 1831, UM 1832, UM 1833

Dear Filing Center:

Please find enclosed the errata pages in clean and redline format for Blue Marmot/400, Moyer/30-31 to replace the errata pages for Blue Marmot/400, Moyer/30-31 that were filed on June 29, 2018. Please completely replace the pages filed on June 29, 2018.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Min Hu", written in a cursive style.

Min Hu

1 which adds those schedules back into the transfer limit calculation and the amount of
2 transmission available for the EIM is increased back to its TTC.

3 **Q. PGE seems to imply that if they have anything less than 295 MW of dedicated**
4 **rights, then there will be no transmission in the EIM. Do you agree?**

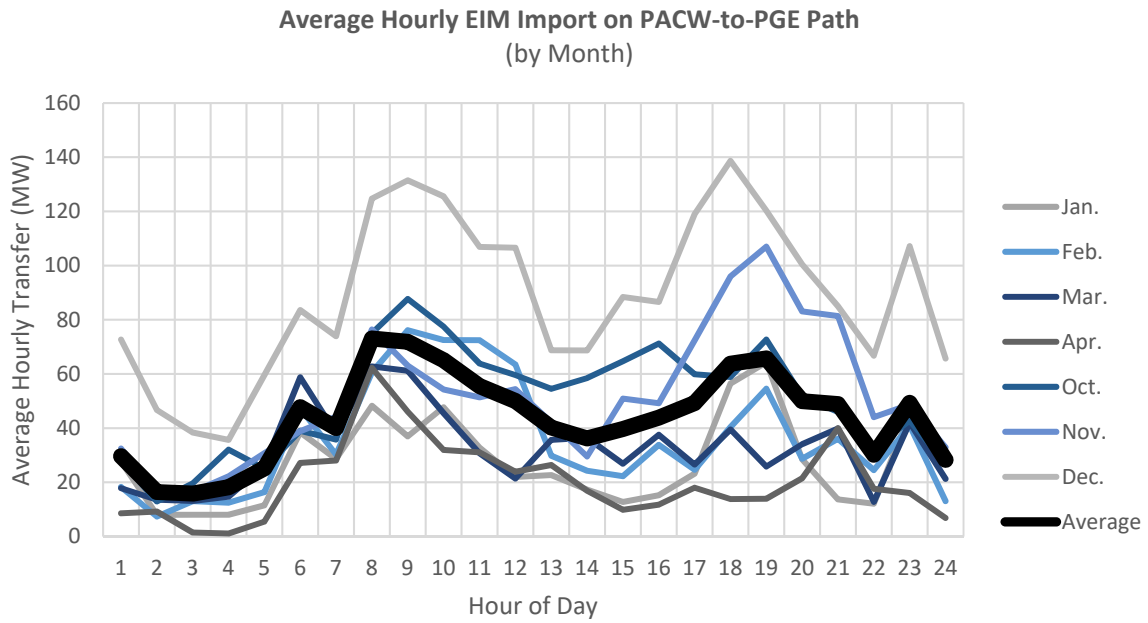
5 **A.** No. Based on the ATC Methodology described above, there will be significant
6 amounts of transmission in the EIM on the PACW-to-PGE import path if PGE were
7 to reduce the amount of Interchange Rights Holder Methodology transmission on the
8 path and dedicate more transmission using the ATC Methodology.

9 **Q. Even if some transmission is used to deliver the output from the Blue Marmots,**
10 **will much of PGE's EIM operations continue under status quo?**

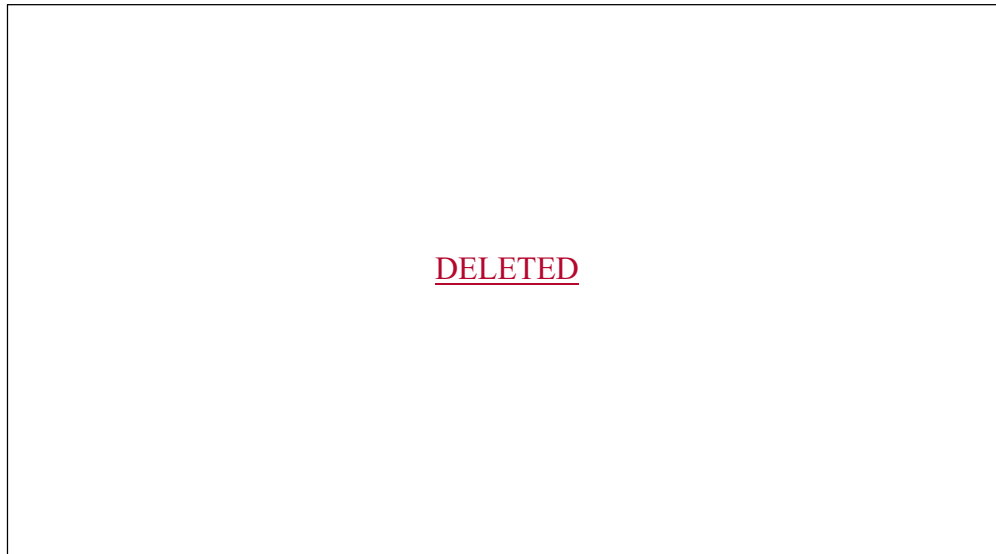
11 **A.** Generally, yes. Figure 2, below, shows when ~~transfers~~ imports into PGE have
12 occurred, on an average hourly basis (based on 15-minute market data), on the
13 PACW-to-PGE path since PGE joined the EIM, broken down by month.

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Figure 2: Average Hourly EIM ~~Transfers~~ Imports into PGE on PACW-to-PGE Path



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PGE imports power on the path during all hours – not just during daytime conditions. In fact, on average, its highest levels of imports occur during the ~~very~~ early-morning hours between 1-4 am and evening hours. Since the Blue Marmots will only be generating during daytime hours, and then even still at reduced levels for

1 which adds those schedules back into the transfer limit calculation and the amount of
2 transmission available for the EIM is increased back to its TTC.

3 **Q. PGE seems to imply that if they have anything less than 295 MW of dedicated**
4 **rights, then there will be no transmission in the EIM. Do you agree?**

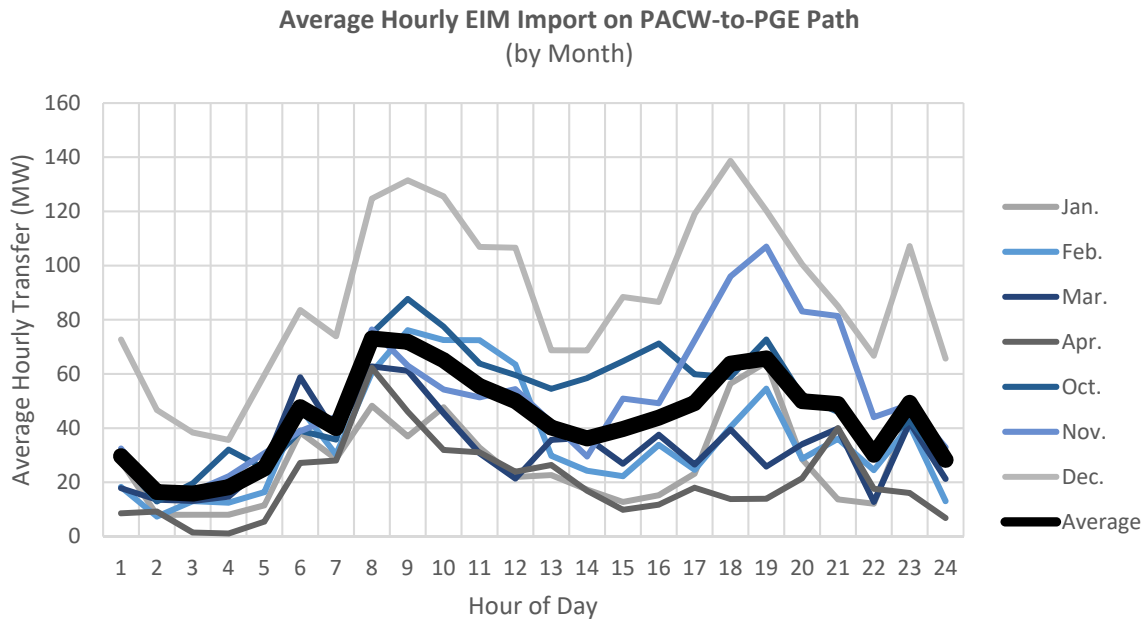
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9 **Q. Even if some transmission is used to deliver the output from the Blue Marmots,**
10 **will much of PGE's EIM operations continue under status quo?**

11 **A.** Generally, yes. Figure 2, below, shows when imports into PGE have occurred, on an
12 average hourly basis (based on 15-minute market data), on the PACW-to-PGE path
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Figure 2: Average Hourly EIM Imports into PGE on PACW-to-PGE Path



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IV. REPLY TO TRANSMISSION TESTIMONY

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Q. Please summarize your general observations regarding PGE’s Transmission Testimony.

PGE imports power on the path during all hours – not just during daytime conditions. In fact, on average, its highest levels of imports occur during the morning and evening hours. Since the Blue Marmots will only be generating during daytime hours, and then even still at reduced levels for much of the time due to weather conditions, I expect that PGE EIM operations will continue much as they have to date and transmission available to the market will not change substantially. This, combined with the historically low utilization of the transfer path and the ATC Methodology benefits, there likely will be very little if any impacts to PGE’s EIM benefits by it accepting the Blue Marmot output at the PACW-PGE interface.