

890 regarding the minimum term for designation of new network resources and the deadline for undesignating network resources, to ensure that transmission customers may utilize hourly transmission service in a manner that sustains the region's real-time firm energy markets and supports resource adequacy in the Western Interconnection.

II. Request for Clarification

A. The Commission Should Clarify that a Transmission Provider May Allow a Minimum Term for Designation of a Network Resource Which is the Same as the Minimum Term for Firm Transmission Service.

In discussing qualifications for network resources, Order 890 states that the minimum term that a transmission provider must honor for designations of new network resources is “the same as the minimum time period used for firm point-to-point service (i.e. daily).”⁴ This language is ambiguous or internally inconsistent if the transmission provider offers hourly firm service. The Pacific Northwest Parties ask the Commission to clarify that the transmission provider may establish a minimum term for designation of network resources that is the same as the minimum term offered by the transmission provider for firm point-to-point service. Thus, if a transmission provider offers hourly firm service, it may (but should not be required to) establish a minimum term of one hour for designation of network resources. This clarification would promote hourly firm energy markets while allowing transmission providers to offer hourly firm transmission service even if they cannot accommodate a one-hour minimum term for designation of

⁴ Order No. 890, P 1505.

network resources. It also would facilitate the continued operation of the robust hourly firm markets in the Western Interconnection.

B. The Commission Should Clarify that, if the Transmission Provider Offers Hourly Firm Transmission Service, the Transmission Provider May Allow a Time Period for Undesignation of Network Resources which is After 10 A.M. of the Day Before Service Commences but Prior to 20 Minutes Before the Hour in which Service Commences

Order 890 states that the deadline for giving notice of an undesignation of a network resource is “before the firm scheduling deadline (10 a.m. the day before service commences).”⁵ Again, this language is ambiguous or internally inconsistent if the transmission provider offers hourly firm service. The Pacific Northwest Parties ask the Commission to clarify that the transmission provider may establish a time limit for the undesignation of network resources that is later than 10 am of the preschedule day but that is, in the transmission provider’s determination, a reasonable time before the deadline for submitting hourly schedules.

III. Conclusion

Adoption of the clarifications described above would support the robust hourly firm power markets in the Western Interconnection. Accordingly, the Pacific Northwest Parties request that the Commission grant their request for clarification in this proceeding.

⁵ Order 890, P 1557.

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Respectfully Submitted:

Avista Corporation:

/s/ Michael G. Andrea
by Michael G. Andrea
Staff Attorney
Avista Corporation
1411 E. Mission Avenue
Spokane, WA 99203
Telephone:(509) 495-2564
Facsimile: (509) 495-5690
email: michael.andrea@avistacorp.com

Bonneville Power Administration:

/s/ Barry Bennett
by Barry Bennett, Attorney
Bonneville Power Administration
Office of General Counsel - LC-7
P.O. Box 3621
Portland, OR 98208-3621
Telephone: (503) 230-4053
Facsimile: (503) 230-7405
email: bbennett@bpa.gov

PacifiCorp:

/s/ Jeffery B. Erb
by Jeffery B. Erb, Assistant General
Counsel
PacifiCorp
825 NE Multnomah Street, Suite 600
Portland, OR 97232
Telephone: (503) 813-5029
Facsimile: (503) 813-7252
email: jeff.erb@pacificorp.com

PNGC Power:

/s/ Joe Nadal
by Joe Nadal, Senior Vice President and
Chief Operating Officer
PNGC Power
711 NE Halsey
Portland, OR 97232
Telephone: (503)-288-1234
Facsimile: (503)-288-2334
email: john_prescott@pngc.com

Portland General Electric Company:

/s/ Pamela G. Lesh
by Pamela G. Lesh, Vice President
Regulatory Affairs and Strategic
Planning
Portland General Electric Company
121 SW Salmon Street, 1WTC17
Portland, Oregon 97204
Telephone: (503) 464-7353
Facsimile: (503) 464- 2222
email: pamela.lesh@pgn.com

Puget Sound Energy, Inc.:

/s/ Donald G. Kari
by Donald G. Kari
Jason Kuzma
Perkins Coie LLP
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
Telephone: (425) 635-1400
Facsimile: (425) 635-2400
email: dkari@perkinscoie.com
jkuzma@perkinscoie.com

Attorneys for Puget Sound Energy, Inc.

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