



**BPA's Tariff Engagement Design  
Public Generating Pool Comments  
January 12, 2016**

The Public Generating Pool (PGP) represents ten consumer-owned utilities in Oregon and Washington, three of which own and operate Balancing Authority Areas (BAA)s. Eight PGP member utilities purchase 34 percent of the requirements power sold by BPA and all PGP member utilities are transmission customers of BPA. PGP appreciates the opportunity to provide feedback to the questions outlined in BPA's Tariff Engagement Design Questionnaire posted December 8, 2016.

BPA presented three straw public process proposals at its Tariff Engagement Design kickoff meeting on December 13<sup>th</sup> for making modifications to its tariff: (1) Case by Case Process, (2) Existing Formal Processes, (3) Scalable Process. PGP believes the following objectives are important in the development of a public process for BPA tariff changes:

- Proposed tariff changes that are significant or potentially controversial require a more formal process, similar to the NW Power Act 7(i) process.
- For those amendments that do not warrant a 7(i) type hearing, a standard minimum level of process is used, including a notice of proposed changes, a formal comment process, and a record of BPA's decision.
- All process is initiated through a public workshop with a comprehensive rationale provided for proposed tariff changes.
  - BPA could also consider the creation of a tariff revision technical team made up of a small group of representative stakeholders.
  - The group would review tariff changes and provide BPA with initial feedback before the changes are presented to a larger audience via a public workshop.
- The public process and all workshops are communicated and open to all stakeholders.
  - Communication regarding any proposed revision should be via email announcement and posted to the external website.
  - Not all stakeholders are assigned an AE or executive contact.
- There is a defined timeline and scope for the public process with limited ability for timeline extensions and scope expansions.
- Revisions to the BPA tariff proposed by customers or stakeholders are tracked in a public written log and presented at the public workshop, along with BPA's rationale for why they recommend to accept or reject the change.
- There is an opportunity for public comments and response to comments.
- BPA provides robust and comprehensive written responses to customer comments.
- Customer comments and responses to comments are posted on a public website.



- Formal documentation is provided for BPA’s decision regarding tariff changes, such as a record of decision.

Based on the objectives outlined above, PGP does not support the Case by Case Process and believes this alternative should be eliminated from further consideration. Additionally, a process similar to the BPA business practice process would not suffice for tariff revisions and should not be adopted for such revisions. PGP recommends that BPA commit to a minimum level of formal process for all proposed changes and ensure sufficient opportunity and transparency for input.