Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

June 18, 2010

Filed Via Overnight Delivery

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Portland General Electric Company, Docket No. ER10- -000

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35 of the regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"), 18 C.F.R. Part 35 (2010), Portland General Electric Company ("PGE") hereby submits for filing certain modifications to its Open Access Transmission Tariff ("OATT" or "Tariff"), PGE's FERC Electric Tariff Third Revised Volume No. 8.

I. Background and Discussion of Tariff Changes

For the reasons discussed below in relation to each of the specific Tariff modifications proposed herein, PGE submits that these modifications are "consistent with or superior to" the Commission's *pro forma* OATT.[1] As such, PGE requests that the Commission approve these Tariff modifications with an effective date of June 21, 2010. Good cause exists to grant waiver of the Commission's notice requirements because the Tariff modifications proposed herein affect primarily non-rate terms and conditions of service under the OATT, and to the extent any modification proposed herein affects Tariff rates, such modifications result in reduced rates to PGE's Transmission Customers.

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[1] Order No. 890, *Preventing Undue Discrimination and Preference in Transmission Service*, 118 FERC ¶ 61,119 at P 135 (2007), *order on reh'g*, Order No. 890-A, 121 FERC ¶ 61,297 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on reh'g*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

PGE requests expedited consideration of the Tariff modifications set forth in this filing, as PGE is in the process of preparing its baseline tariff filing in accordance with the Commission's Order No. 714 eTariff requirements,[2] and would like to include these modifications in that baseline filing if possible. PGE's baseline filing is due to be filed with the Commission on or before September 15, 2010.[3] As a result, PGE requests that FERC issue an order addressing the OATT modifications proposed herein by August 1, 2010.

A. Reference to FERC Annual Charges in Attachment H

Last year, in Docket No. ER09-1170-000, the Commission accepted for filing PGE's proposal to remove language from Schedules 7, 8 and 9 of PGE's Tariff that allowed PGE to assess its FERC annual charges to its transmission customers on the basis of megawatt hours (MWh) delivered.[4] As PGE stated in its filing in that docket, the annual charges provisions are not *pro forma* OATT language, and PGE requested to remove these provisions because PGE no longer wished to retain the ability to pass through its FERC annual charges costs to its OATT customers.

PGE inadvertently failed to remove one additional reference to the FERC annual charges in Section 5 of Attachment H to its OATT ("Annual Transmission Revenue Requirement For Network Integration Transmission Service"). For the same reasons stated in Docket No. ER09-1170-000, and to be consistent with the removal of annual charges language in that docket, PGE hereby requests to remove Section 5 of Attachment H in its entirety.

B. Updates to Attachment L

As a result of PGE's experience determining Transmission Customers' creditworthiness in recent times of economic volatility, and also due to difficulties PGE has experienced applying its current creditworthiness provisions to international and governmental Transmission Customers, PGE proposes several modifications to its creditworthiness procedures set forth in Attachment L of its Tariff. These proposed modifications include the following:

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2 *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008).

3 *Electronic Tariff Filings,* 130 FERC ¶ 61,228 (2010) (establishing August 2010 as the timing for PGE's baseline eTariff filing).

4 *See* July 14, 2009, Letter Order in Docket No. ER09-1170-000.

- PGE proposes to modify Sections 2A and 3 of Attachment L to require Transmission Customers to provide, and allow PGE to consider, the customers' most recent interim quarterly financial statements. Currently, customers provide only the most recent two years of audited, independent financial statements. In light of ongoing economic volatility, PGE has determined that its creditworthiness determinations would be bolstered by reviewing more timely financial information, rather than relying on potentially out-of-date audited financial statements.

- PGE proposes to clarify that, in the case of Transmission Customers that are governmental entities, PGE may review such entities' general obligations or revenue bond ratings. This addition enhances PGE's ability to make accurate creditworthiness determinations of governmental entities, which may not have the agency credit ratings (*e.g.*, S&P or Moody's) that PGE relies on in assessing other customers' creditworthiness.

- PGE proposes to remove Dun & Bradstreet scores from the information requested under Section 2C and quantitative factors considered under Section 3B(1) of Attachment L, as Dun & Bradstreet information is often unavailable for international Transmission Customers. To the extent Dun & Bradstreet information is available for international customers, it frequently includes data that differs from that available on U.S. customers, making it difficult to apply consistently among U.S. and international customers.

C. Minor Corrections

PGE has identified certain minor corrections (*e.g.*, typographical and stylistic errors) in its Tariff and proposes to correct these issues in the attached Tariff sheets. These modifications include the following:

-Changing the second Section 13.1 to 13.2 on First Revised Sheet No. 42 (there are currently two Sections numbered 13.1);

-Capitalizing the "T" in "Point-to-Point" in Section 13.2(ii), also on First Revised Sheet No. 42;

-Adding the Section Number "13.7" to the "Classification of Firm Transmission Service" section on Original Sheet No. 48 (it is identified as Section 13.7 in the Table of Contents);

-Changing the PGE recipient of written applications to be sent pursuant to Section 17.1 from "Project Manager, Wholesale Transmission Services," to "Administrator, Transmission & Reliability Services" on Original Sheet No. 63;

- Adding the Section Number "18.2" to the "Completed Application" section on Original Sheet No. 71 (it is identified as Section 18.2 in the Table of Contents);

-Replacing "(1)" with "(i)" to unify the numbering format in the first paragraph of Section 23.1, First Revised Sheet No. 90;

- Adding the Section Number "30.3" to the "Termination of Network Resources" section on Second Revised Sheet No. 107 (it is identified as Section 30.3 in the Table of Contents);

-Adding the title "Daily delivery" in section 4 of Schedule 8, First Revised Sheet No. 153;

-Deleting the extraneous "/MWH" from section 5 of Schedule 8, also on First Revised Sheet No. 153; and

-Capitalizing "Balancing Authority" and "Reliability Coordinator" in part (f) of Schedule 10, First Revised Sheet No. 164.

II. Information Required by Section 35.13 (b)

A. Documents Submitted with this Filing

This filing consists of the following documents:

- This transmittal letter;
- Attachment A, a clean copy of the Tariff sheets containing the revisions proposed herein; and
- Attachment B, a black-lined copy of the Tariff sheets reflecting the revisions proposed herein.

B. Proposed Effective Date

PGE requests that the Commission accept the attached Tariff sheets effective June 21, 2010. Section 35.11 of the Commission's regulations permits waiver of the 60 day prior notice requirement upon a showing of good cause.[5] Good cause exists to grant waiver of the Commission's notice requirements because the Tariff modifications proposed herein affect primarily non-rate terms and conditions of service under the OATT, and to the extent any modification proposed herein might affect Tariff rates, such modifications result in reduced rates to PGE's Transmission Customers.

C. Persons to Whom the Proposed Rate Schedules Have Been Mailed

PGE has mailed a copy of this filing, including the proposed revised Tariff, to its transmission customers and to the Oregon Public Utility Commission. PGE has also posted a copy of this filing on its OASIS.

D. Brief Description of the Rate Schedule Change

The OATT changes are described fully in Section I above.

E. Reasons for the Rate Schedule Changes

The reasons for the OATT changes are described fully in Section I above.

F. Showing that All Requisite Agreements have been Obtained

No agreements of other parties are necessary for the modifications proposed herein.

III. Request for Waivers

To the extent necessary to permit the OATT modifications to become effective as requested herein, PGE requests that the Commission waive any and all requirements under Part 35 of the Commission's regulations (and any other applicable regulations) not addressed above in Part II of this filing.

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[5] 18 C.F.R. § 35.11 (2010). *See also, e.g., Central Hudson Gas & Elec. Corp.*, 60 FERC ¶ 61,106, *order on reh'g*, 61 FERC ¶ 61,089 (1992).

IV. Communications

The following persons are authorized to receive notices and communications with respect to the instant filing:

Donald J. Light
Assistant General Counsel
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121 SW Salmon Street, 1WTC1301
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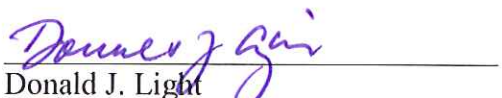
adam.menendez@pgn.com

V. Conclusion

For the reasons set forth above, PGE requests that the Commission accept the revised Tariff sheets submitted with this filing with an effective date of June 21, 2010.

Respectfully Submitted,



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Attachments

Attachment A
Clean sheets

II. POINT-TO-POINT TRANSMISSION SERVICE

Preamble

The Transmission Provider will provide Firm and Non-Firm Point-To-Point Transmission Service pursuant to the applicable terms and conditions of this Tariff. Point-To-Point Transmission Service is for the receipt of capacity and energy at designated Point(s) of Receipt and the transfer of such capacity and energy to designated Point(s) of Delivery.

13 Nature of Firm Point-To-Point Transmission Service

13.1 Term:

The minimum term of Firm Point-To-Point Transmission Service shall be one day and the maximum term shall be specified in the Service Agreement.

13.2 Reservation Priority:

(i) Long-Term Firm Point-To-Point Transmission Service shall be available on a first-come, first-served basis, i.e., in the chronological sequence in which each Transmission Customer has requested service.

(ii) Reservations for Short-Term Firm Point-To-Point Transmission Service will be conditional based upon the length of the requested transaction or reservation. However, Pre-Confirmed Applications for Short-Term Point-To-Point Transmission Service will receive priority over earlier-submitted requests that are not Pre-Confirmed and that have equal or shorter duration. Among requests or reservations with the

implements emergency procedures to Curtail Firm Transmission Service, the Transmission Customer shall make the required reductions upon request of the Transmission Provider. However, the Transmission Provider reserves the right to Curtail, in whole or in part, any Firm Transmission Service provided under the Tariff when, in the Transmission Provider's sole discretion, an emergency or other unforeseen condition impairs or degrades the reliability of its Transmission System. The Transmission Provider will notify all affected Transmission Customers in a timely manner of any scheduled Curtailments.

13.7 Classification of Firm Transmission Service:

(a) The Transmission Customer taking Firm Point-To-Point Transmission Service may (1) change its Receipt and Delivery Points to obtain service on a non-firm basis consistent with the terms of Section 22.1 or (2) request a modification of the Points of Receipt or Delivery on a firm basis pursuant to the terms of Section 22.2.

(b) The Transmission Customer may purchase transmission service to make sales of capacity and energy from multiple generating units that are on the Transmission Provider's Transmission System. For such a purchase of transmission service, the resources will be designated as multiple Points of

(f) The Transmission Customer has executed a Point-To-Point Service Agreement or has agreed to receive service pursuant to Section 15.3.

16.2 Transmission Customer Responsibility for Third-Party Arrangements:

Any scheduling arrangements that may be required by other electric systems shall be the responsibility of the Transmission Customer requesting service. The Transmission Customer shall provide, unless waived by the Transmission Provider, notification to the Transmission Provider identifying such systems and authorizing them to schedule the capacity and energy to be transmitted by the Transmission Provider pursuant to Part II of the Tariff on behalf of the Receiving Party at the Point of Delivery or the Delivering Party at the Point of Receipt. However, the Transmission Provider will undertake reasonable efforts to assist the Transmission Customer in making such arrangements, including without limitation, providing any information or data required by such other electric system pursuant to Good Utility Practice.

17 Procedures for Arranging Firm Point-To-Point Transmission Service

17.1 Application:

A request for Firm Point-To-Point Transmission Service for periods of one year or longer must contain a written Application to: Administrator, Transmission & Reliability Services, Portland General Electric Company, 121 SW Salmon Street, Portland, Oregon 97204, at least sixty (60) days in advance of the calendar month in which service is to

Transmission Provider's time recorded telephone line. Each of these methods will provide a time-stamped record for establishing the service priority of the Application.

18.2 Completed Application:

A Completed Application shall provide all of the information included in 18 CFR § 2.20 including but not limited to the following:

(i) The identity, address, telephone number and facsimile number of the entity requesting service;

(ii) A statement that the entity requesting service is, or will be upon commencement of service, an Eligible Customer under the Tariff;

(iii) The Point(s) of Receipt and the Point(s) of Delivery;

(iv) The maximum amount of capacity requested at each Point of Receipt and Point of Delivery; and

(v) The proposed dates and hours for initiating and terminating transmission service hereunder.

In addition to the information specified above, when required to properly evaluate system conditions, the Transmission Provider also may ask the Transmission Customer to provide the following:

(vi) The electrical location of the initial source of the power to be transmitted pursuant to the Transmission Customer's request for service; and

23 Sale or Assignment of Transmission Service

23.1 Procedures for Assignment or Transfer of Service:

Subject to Commission approval of any necessary filings, a Transmission Customer may sell, assign, or transfer all or a portion of its rights under its Service Agreement, but only to another Eligible Customer (the Assignee). The Transmission Customer that sells, assigns or transfers its rights under its Service Agreement is hereafter referred to as the Reseller. Compensation to Resellers shall not exceed the higher of (i) the original rate paid by the Reseller, (ii) the Transmission Provider's maximum rate on file at the time of the assignment, or (iii) the Reseller's opportunity cost capped at the Transmission Provider's cost of expansion; provided that, for service prior to October 1, 2010, compensation to Resellers shall be at rates established by agreement between Reseller and the Assignee.

The Assignee must execute a service agreement with the Transmission Provider governing reassignments of transmission service prior to the date on which the reassignment service commences. The Transmission Provider shall charge the Reseller, as appropriate, at the rate stated in the Reseller's Service Agreement with the Transmission Provider or the associated OASIS schedule and credit the Reseller with the price reflected in the Assignee's Service Agreement with the Transmission Provider or the associated OASIS schedule; provided that, such credit shall be reversed in the event of non-payment by Assignee. If the Assignee does not request any change in the Point(s) of Receipt or the Point(s) of Delivery, or a change in any other term or condition set forth in the original Service Agreement, the Assignee will receive the same services as did the Reseller and the priority of service for the Assignee will be the same as that of the Reseller. The Assignee will be subject to all terms and conditions of this Tariff. If the Assignee requests a change in service, the reservation priority of service will be determined by the Transmission Provider pursuant to Section 13.2.

sharing program. The Network Customer's request will be deemed deficient if it does not include this statement and the Transmission Provider will follow the procedures for a deficient application as described in Section 29.2 of the Tariff.

30.3 Termination of Network Resources:

The Network Customer may terminate the designation of all or part of a generating resource as a Network Resource by providing notification to the Transmission Provider through OASIS as soon as reasonably practicable, but not later than the firm scheduling deadline for the period of termination. Any request for termination of Network Resource status must be submitted on OASIS, and should indicate whether the request is for indefinite or temporary termination. A request for indefinite termination of Network Resource status must indicate the date and time that the termination is to be effective, and the identification and capacity of the resource(s) or portions thereof to be indefinitely terminated. A request for temporary termination of Network Resource status must include the following:

(i) Effective date and time of temporary termination;

(ii) Effective date and time of redesignation, following period of temporary termination;

(iii) Identification and capacity of resource(s) or portions thereof to be temporarily terminated or where appropriate, identification of the NERC-registered Point of Receipt to which Network Resources are assigned and the capacity to be temporarily terminated;

SCHEDULE 8

Non-Firm Point-To-Point Transmission Service

The Transmission Customer shall compensate the Transmission Provider for Non-Firm Point-To-Point Transmission Service up to the sum of the applicable charges set forth below:

1) **Monthly delivery:** $0.523/kW of Reserved Capacity per month.

2) **Weekly delivery:** $0.121/kW of Reserved Capacity per week.

3) **Daily delivery:** $0.020/kW of Reserved Capacity per day On-peak.

4) **Daily delivery:** $0.017/kW of Reserved Capacity per day Off-peak.

The total demand charge in any week, pursuant to a reservation for Daily delivery, shall not exceed the rate specified in section (2) above times the highest amount in kilowatts of Reserved Capacity in any day during such week.

The peak period for daily service shall be all hours Monday through Saturday, excluding WECC holidays. The peak period for hourly service shall be the sixteen hours from 6:00 a.m. to 10 p.m., Monday through Saturday, excluding WECC holidays.

5) **Hourly delivery:** The basic charge shall be that agreed upon by the Parties at the time this service is reserved and in no event shall exceed $1.257/MWh On-Peak, and $0.718/MWh Off-peak. The total demand charge in any day, pursuant to a reservation for Hourly delivery, shall not exceed the rate specified in section (3) above times the highest

delivered to the Non-offending Customer's load or from the Non-offending Customer's generation that hour.

B. The hourly distributions of revenues from Penalty Charges will be credited to the Non-offending Customer.

(f) Notwithstanding the foregoing, deviations from scheduled transactions in order to respond to directives by the Transmission Provider, a Balancing Authority, or a Reliability Coordinator shall not be subject to the deviation bands identified above and, instead, shall be settled financially, at the end of the month, at 100 percent of incremental and decremental cost. Such directives may include instructions to correct frequency decay, respond to a reserve sharing event, or change output to relieve congestion.

4. All quantities used in calculating the Network Customer's Network load and Transmission Provider's Monthly Transmission System Peak shall be adjusted to the transmission system input level, i.e., shall include the transmission capacity amount associated with any applicable losses.

ATTACHMENT L

Creditworthiness Procedures

1. Applicability

These Creditworthiness Procedures will be used to determine the ability of a Transmission Customer to meet its obligations under this Tariff. The Transmission Provider will review each Transmission Customer's creditworthiness prior to the execution of a Service Agreement to determine the amount of any security required as a condition of such service. In assessing the credit of a Transmission Customer, the Transmission Provider will consider the qualitative and quantitative measures listed in Section 3B of these Procedures.

2. Information Required from Transmission Customer

A Transmission Customer must provide the Transmission Provider with the following information:

A. The most recent two years of audited, independent financial statements, and the most recent interim quarterly statements, including balance sheet, income statement, statement of cash flows and related footnotes. If these are not available, then Transmission Customer must provide the most recent two years of financial statements of an investment grade company willing to guarantee all financial obligations of the Transmission Customer pursuant to Section 4D of these Procedures.

B. S&P and/or Moody's senior long term unsecured credit ratings. In the case of governmental customers, general obligations or revenue bond ratings may apply.

C. If the Transmission Customer is applying for Network Integration Transmission Service it must, to the extent possible, identify the load it will be serving.

D. If the Transmission Customer is applying for Short Term Firm or Non-Firm Point-to-Point Service, it must, to the extent possible, provide an estimate of the amount of service it will be taking.

3. Summary of the Procedure for Determining the Level of Secured and Unsecured Credit.

A. Determination of Credit Levels and Required Security. The Transmission Provider will evaluate each Transmission Customer based on the information provided by the Transmission Customer and otherwise available to the Transmission Provider. The Transmission Provider will determine a credit score for each Transmission Customer that meets the minimum requirements for unsecured credit. The credit score is determined by inputting the quantitative factors described in Section B below into an internal scoring model. A weighted average score is then calculated using these inputs. In addition to the scoring model, the Transmission Provider will consider the qualitative factors described in Section B below. Based on these factors the Transmission Provider will determine the amount of credit to be extended and any required security.

Minimum Requirements

The following minimum factors must be met in order to qualify for unsecured credit:

- Audited financial statements from the past two years, and the most recent interim quarterly statements, that meet the criteria set forth in section 2A.
- Investment grade senior long term unsecured credit ratings from S&P and/or Moody's of at least BBB- and Baa3, respectively. If Transmission Customer is rated by both agencies, both ratings must be investment grade. In the case of governmental customers, general obligations or revenue bond ratings may apply.

B. Factors Considered. The Transmission Provider will evaluate all Transmission Customers on a comparable and non-discriminatory basis. In determining the amount of credit to be extended to a Transmission Customer, the Transmission Provider will consider both quantitative and qualitative factors including the following:

(1) Quantitative Factors

The following quantitative factors are input into the internal scoring model to determine a credit score.

- Financial statement amounts used to calculate customary financial statement measures such as total debt to total capitalization and tangible net worth.
- Investment grade senior long-term unsecured credit ratings from S&P and/or Moody's.

(2) Qualitative Factors.

The following are some of the qualitative factors considered:

- Demonstration of strong financial standing as a stand alone entity and ability to show access to internal and external financial resources that provide sufficient liquidity to support existing and proposed obligations.

D. Initial Requirement to Post Security. Transmission Customers who do not qualify for an Acceptable Credit Limit, are below investment grade or do not have audited financial statements will be required to post security. The Transmission Provider will notify such customers by email of the requirement to post security. Upon request by the Transmission Customer, the Transmission Provider will provide the Transmission Customer with a written explanation of how the Transmission Provider applied this credit evaluation to the Transmission Customer.

E. Right to Contest Initial Determination of Credit Limits or Security Requirements. The Transmission Customer may contest the initial determination of credit limits or security requirements by submitting a written explanation of its reasons for challenging the credit levels or security requirements to the Transmission Provider. Within ten (10) Working Days of receiving Transmission Customer's written explanation, the Transmission Provider will review and provide a written response to the Transmission Customer's written explanation. Transmission Customers requesting new transmission service must post any required security no less than ten (10) Working Days prior to the commencement of service.

F. Reevaluation of Credit Risk. The Transmission Provider will reevaluate each Transmission Customer's credit risk on an annual basis, or as needed, and may adjust a Transmission Customer's credit limits and corresponding security requirements based on such reevaluation. In conducting the reevaluation, the Transmission Provider will consider the factors identified in Section 3B of these Procedures. As part of its reevaluation, the Transmission Provider may require a Transmission Customer to provide updated financial information. The Transmission Provider will notify the Transmission Customer by email of a change in credit limits or security requirements and provide a written explanation of any such changes. Within five (5) Working Days from receipt of a notice

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13.2 Reservation Priority:

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implements emergency procedures to Curtail Firm Transmission Service, the Transmission Customer shall make the required reductions upon request of the Transmission Provider. However, the Transmission Provider reserves the right to Curtail, in whole or in part, any Firm Transmission Service provided under the Tariff when, in the Transmission Provider's sole discretion, an emergency or other unforeseen condition impairs or degrades the reliability of its Transmission System. The Transmission Provider will notify all affected Transmission Customers in a timely manner of any scheduled Curtailments.

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(f) The Transmission Customer has executed a Point-To-Point Service Agreement or has agreed to receive service pursuant to Section 15.3.

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Any scheduling arrangements that may be required by other electric systems shall be the responsibility of the Transmission Customer requesting service. The Transmission Customer shall provide, unless waived by the Transmission Provider, notification to the Transmission Provider identifying such systems and authorizing them to schedule the capacity and energy to be transmitted by the Transmission Provider pursuant to Part II of the Tariff on behalf of the Receiving Party at the Point of Delivery or the Delivering Party at the Point of Receipt. However, the Transmission Provider will undertake reasonable efforts to assist the Transmission Customer in making such arrangements, including without limitation, providing any information or data required by such other electric system pursuant to Good Utility Practice.

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Transmission Provider's time recorded telephone line. Each of these methods will provide a time-stamped record for establishing the service priority of the Application.

18.2 Completed Application:

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A Completed Application shall provide all of the information included in 18 CFR § 2.20 including but not limited to the following:

(i) The identity, address, telephone number and facsimile number of the entity requesting service;

(ii) A statement that the entity requesting service is, or will be upon commencement of service, an Eligible Customer under the Tariff;

(iii) The Point(s) of Receipt and the Point(s) of Delivery;

(iv) The maximum amount of capacity requested at each Point of Receipt and Point of Delivery; and

(v) The proposed dates and hours for initiating and terminating transmission service hereunder.

In addition to the information specified above, when required to properly evaluate system conditions, the Transmission Provider also may ask the Transmission Customer to provide the following:

(vi) The electrical location of the initial source of the power to be transmitted pursuant to the Transmission Customer's request for service; and

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23 Sale or Assignment of Transmission Service

23.1 Procedures for Assignment or Transfer of Service:

Subject to Commission approval of any necessary filings, a Transmission Customer may sell, assign, or transfer all or a portion of its rights under its Service Agreement, but only to another Eligible Customer (the Assignee). The Transmission Customer that sells, assigns or transfers its rights under its Service Agreement is hereafter referred to as the Reseller. Compensation to Resellers shall not exceed the higher of (i) the original rate paid by the Reseller, (ii) the Transmission Provider's maximum rate on file at the time of the assignment, or (iii) the Reseller's opportunity cost capped at the Transmission Provider's cost of expansion; provided that, for service prior to October 1, 2010, compensation to Resellers shall be at rates established by agreement between Reseller and the Assignee.

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The Assignee must execute a service agreement with the Transmission Provider governing reassignments of transmission service prior to the date on which the reassignment service commences. The Transmission Provider shall charge the Reseller, as appropriate, at the rate stated in the Reseller's Service Agreement with the Transmission Provider or the associated OASIS schedule and credit the Reseller with the price reflected in the Assignee's Service Agreement with the Transmission Provider or the associated OASIS schedule; provided that, such credit shall be reversed in the event of non-payment by Assignee. If the Assignee does not request any change in the Point(s) of Receipt or the Point(s) of Delivery, or a change in any other term or condition set forth in the original Service Agreement, the Assignee will receive the same services as did the Reseller and the priority of service for the Assignee will be the same as that of the Reseller. The Assignee will be subject to all terms and conditions of this Tariff. If the Assignee requests a change in service, the reservation priority of service will be determined by the Transmission Provider pursuant to Section 13.2.

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sharing program. The Network Customer's request will be deemed deficient if it does not include this statement and the Transmission Provider will follow the procedures for a deficient application as described in Section 29.2 of the Tariff.

30.3 Termination of Network Resources:

The Network Customer may terminate the designation of all or part of a generating resource as a Network Resource by providing notification to the Transmission Provider through OASIS as soon as reasonably practicable, but not later than the firm scheduling deadline for the period of termination. Any request for termination of Network Resource status must be submitted on OASIS, and should indicate whether the request is for indefinite or temporary termination. A request for indefinite termination of Network Resource status must indicate the date and time that the termination is to be effective, and the identification and capacity of the resource(s) or portions thereof to be indefinitely terminated. A request for temporary termination of Network Resource status must include the following:

(i) Effective date and time of temporary termination;

(ii) Effective date and time of redesignation, following period of temporary termination;

(iii) Identification and capacity of resource(s) or portions thereof to be temporarily terminated or where appropriate, identification of the NERC-registered Point of Receipt to which Network Resources are assigned and the capacity to be temporarily terminated;

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SCHEDULE 8

Non-Firm Point-To-Point Transmission Service

The Transmission Customer shall compensate the Transmission Provider for Non-Firm Point-To-Point Transmission Service up to the sum of the applicable charges set forth below:

1) **Monthly delivery:** $0.523/kW of Reserved Capacity per month.

2) **Weekly delivery:** $0.121/kW of Reserved Capacity per week.

3) **Daily delivery:** $0.020/kW of Reserved Capacity per day On-peak.

4) Daily delivery: $0.017/kW of Reserved Capacity per day Off-peak.

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The total demand charge in any week, pursuant to a reservation for Daily delivery, shall not exceed the rate specified in section (2) above times the highest amount in kilowatts of Reserved Capacity in any day during such week.

The peak period for daily service shall be all hours Monday through Saturday, excluding WECC holidays. The peak period for hourly service shall be the sixteen hours from 6:00 a.m. to 10 p.m., Monday through Saturday, excluding WECC holidays.

5) **Hourly delivery:** The basic charge shall be that agreed upon by the Parties at the time this service is reserved and in no event shall exceed $1.257/MWh On-Peak, and $0.718/MWh Off-peak. The total demand charge in any day, pursuant to a reservation for Hourly delivery, shall not exceed the rate specified in section (3) above times the highest

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delivered to the Non-offending Customer's load or from the Non-offending Customer's generation that hour.

B. The hourly distributions of revenues from Penalty Charges will be credited to the Non-offending Customer.

(f) Notwithstanding the foregoing, deviations from scheduled transactions in order to respond to directives by the Transmission Provider, a Balancing Authority, or a Reliability Coordinator shall not be subject to the deviation bands identified above and, instead, shall be settled financially, at the end of the month, at 100 percent of incremental and decremental cost. Such directives may include instructions to correct frequency decay, respond to a reserve sharing event, or change output to relieve congestion.

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4. All quantities used in calculating the Network Customer's Network load and Transmission Provider's Monthly Transmission System Peak shall be adjusted to the transmission system input level, i.e., shall include the transmission capacity amount associated with any applicable losses.

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ATTACHMENT L

Creditworthiness Procedures

1. Applicability

These Creditworthiness Procedures will be used to determine the ability of a Transmission Customer to meet its obligations under this Tariff. The Transmission Provider will review each Transmission Customer's creditworthiness prior to the execution of a Service Agreement to determine the amount of any security required as a condition of such service. In assessing the credit of a Transmission Customer, the Transmission Provider will consider the qualitative and quantitative measures listed in Section 3B of these Procedures.

2. Information Required from Transmission Customer

A Transmission Customer must provide the Transmission Provider with the following information:

A. The most recent two years of audited, independent financial statements, and the most recent interim quarterly statements, including balance sheet, income statement, statement of cash flows and related footnotes. If these are not available, then Transmission Customer must provide the most recent two years of financial statements of an investment grade company willing to guarantee all financial obligations of the Transmission Customer pursuant to Section 4D of these Procedures.

B. S&P and/or Moody's senior long term unsecured credit ratings. In the case of governmental customers, general obligations or revenue bond ratings may apply.

C. If the Transmission Customer is applying for Network Integration Transmission Service it must, to the extent possible, identify the load it will be serving.

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D. If the Transmission Customer is applying for Short Term Firm or Non-Firm Point-to-Point Service, it must, to the extent possible, provide an estimate of the amount of service it will be taking.

3. Summary of the Procedure for Determining the Level of Secured and Unsecured Credit.

A. Determination of Credit Levels and Required Security. The Transmission Provider will evaluate each Transmission Customer based on the information provided by the Transmission Customer and otherwise available to the Transmission Provider. The Transmission Provider will determine a credit score for each Transmission Customer that meets the minimum requirements for unsecured credit. The credit score is determined by inputting the quantitative factors described in Section B below into an internal scoring model. A weighted average score is then calculated using these inputs. In addition to the scoring model, the Transmission Provider will consider the qualitative factors described in Section B below. Based on these factors the Transmission Provider will determine the amount of credit to be extended and any required security.

Minimum Requirements

The following minimum factors must be met in order to qualify for unsecured credit:

- Audited financial statements from the past two years, and the most recent interim quarterly statements, that meet the criteria set forth in section 2A.
- Investment grade senior long term unsecured credit ratings from S&P and/or Moody's of at least BBB- and Baa3, respectively. If Transmission Customer is rated by both agencies, both ratings must be investment grade. In the case of governmental customers, general obligations or revenue bond ratings may apply

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B. Factors Considered. The Transmission Provider will evaluate all Transmission Customers on a comparable and non-discriminatory basis. In determining the amount of credit to be extended to a Transmission Customer, the Transmission Provider will consider both quantitative and qualitative factors including the following:

(1) Quantitative Factors

The following quantitative factors are input into the internal scoring model to determine a credit score.

- Financial statement amounts used to calculate customary financial statement measures such as total debt to total capitalization and tangible net worth.
- Investment grade senior long-term unsecured credit ratings from S&P and/or Moody's.

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(2) Qualitative Factors.

The following are some of the qualitative factors considered:

- Demonstration of strong financial standing as a stand alone entity and ability to show access to internal and external financial resources that provide sufficient liquidity to support existing and proposed obligations.

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D. Initial Requirement to Post Security. Transmission Customers who do not qualify for an Acceptable Credit Limit, are below investment grade or do not have audited financial statements will be required to post security. The Transmission Provider will notify such customers by email of the requirement to post security. Upon request by the Transmission Customer, the Transmission Provider will provide the Transmission Customer with a written explanation of how the Transmission Provider applied this credit evaluation to the Transmission Customer.

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E. Right to Contest Initial Determination of Credit Limits or Security Requirements. The Transmission Customer may contest the initial determination of credit limits or security requirements by submitting a written explanation of its reasons for challenging the credit levels or security requirements to the Transmission Provider. Within ten (10) Working Days of receiving Transmission Customer's written explanation, the Transmission Provider will review and provide a written response to the Transmission Customer's written explanation. Transmission Customers requesting new transmission service must post any required security no less than ten (10) Working Days prior to the commencement of service.

F. Reevaluation of Credit Risk. The Transmission Provider will reevaluate each Transmission Customer's credit risk on an annual basis, or as needed, and may adjust a Transmission Customer's credit limits and corresponding security requirements based on such reevaluation. In conducting the reevaluation, the Transmission Provider will consider the factors identified in Section 3B of these Procedures. As part of its reevaluation, the Transmission Provider may require a Transmission Customer to provide updated financial information. The Transmission Provider will notify the Transmission Customer by email of a change in credit limits or security requirements and provide a written explanation of any such changes. Within five (5) Working Days from receipt of a notice

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