

**Portland General Electric Comments  
on PRR 1181: Attachment B changes to support Tariff Section 4.6.4 (Masterfile Submission)**

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Portland General Electric Company (“PGE”) appreciates the opportunity to provide comments on the Proposed Revision Request (PRR) 1181.

PGE shares the concerns expressed by other commenters that CAISO’s proposal to require additional supporting materials for all Masterfile submissions is unduly burdensome to both the Scheduling Coordinators and to the CAISO.

PGE, like other entities, has a direct interest in ensuring that its resources are modelled correctly to ensure that proposed changes to their operations do not create any financial and/or reliability-based consequences. While PGE would expect to provide the data referenced on an as needed basis, PGE is concerned that CAISO’s proposed revisions will create an inefficient and onerous modification process that prohibits timely Master File revisions and provides no additional assurance that the physical capabilities of each resource are more accurately represented in the Master File.

PGE appreciates the opportunity to provide comments and looks forward to working with the ISO and stakeholders to develop and implement efficient, effective solutions to the issues identified.