

January 7, 2021

RE: Transmission Service Requests Evaluation Business Practice, Version 1

Powerex submits the following comments in response to Bonneville's posting of the Draft Transmission Service Requests Evaluation, Version 1.

Since the implementation of the limitation of Hourly Firm service on July 1, 2019, Powerex has engaged Bonneville through its workshops and commented extensively on the appropriate application of the *de minimis* tests to short-term redirect requests.¹

As previously recounted, implementation of the TC-20 Settlement limitation of Hourly Firm exposed a different treatment of short-term requests versus long-term requests that was not previously apparent or evident to transmission customers. Powerex entered the TC-20 settlement—and specifically agreed to the hourly firm limitations—based on its understanding that BPA was implementing its related policies and business practices as written. But this was not the case. In the course of the BP-22/TC-22 rate-case workshop period, BPA has since acknowledged that there was a misalignment between its implementation of the *de minimis* tests and its relevant policy and practice documents, and Bonneville has also acknowledged the reasonable basis for customer confusion and concern as to how the *de minimis* tests are being applied.² To remedy the misalignment, Powerex has strongly urged Bonneville to apply the *de minimis* Test 2 to short-term requests to maintain consistency with how short-term requests were evaluated prior to the TC-20 Settlement limitation of Hourly Firm implementation. Powerex reiterates its previous comments and again urges Bonneville to reconsider its decision and to work with customers so that a “*De Minimis* Test 2” can be applied to short-term requests.

In response to the draft language proposed in the Business Practice, Powerex requests that Bonneville clarify in Section D, or, at a minimum, a footnote to “Table 2: Short-Term De Minimis Impact Criteria” (Redline page 11), the reasons that Test 2 is not applied to short term requests.

Sincerely,

Raj Hundal
Market Policy and Practices Manager

¹ See Powerex Corp., Comments on the December 12, 2019 Workshop – *De Minimis* Test Implementation (Jan. 8, 2020); Powerex Corp., Comments on the March 17, 2020 Workshop (Mar. 31, 2020); Powerex Corp., Comments on Bonneville's May 29, 2020 De Minimis Test Workshop (June 12, 2020).

² See Bonneville Power Admin., Bonneville Update to Customer Concerns Regarding De Minimis Policy and Application (Mar. 2020).