

June 1, 2021

RE: Redirect of Transmission Service Business Practice, Version 25

Powerex appreciates the opportunity to provide comments on the Redirect of Transmission Service Business Practice.

Powerex recognizes that Bonneville is trying to implement the required changes (Consolidation, Resales, Redirects, and Pre-emption and Competition Module) associated with FERC Order 676-I as soon as possible, however it is not required until late October, 2021. Powerex reiterates our comments that were provided to Bonneville during the comment period for Resale and Consolidation Business Practices, as well as during the Bonneville's Commercial Systems Support and Development Customer Conference Call on May 19th, 2021. Powerex highlighted that the implementation of these changes during July and August would not be ideal due to the concerns for summer readiness across the WECC region, and that these months generally have higher volumes of transmission activity. It would be preferable for these changes to be implemented outside the summer time period to avoid disruption to customers' ability to transact within the Bonneville Balancing Authority Area.

Given the above concerns, it would be more appropriate for Bonneville to implement the changes associated with these business practices no earlier than mid-September to avoid any potential negative impacts.

Thank you kindly for considering our comments.

Sincerely,

Raj Hundal
Market Policy and Practices Manager