

July 15, 2021

RE: TSR Study and Expansion Process, Version 6 and Requesting Transmission Service, Version 40

Powerex appreciates the opportunity to comment on all of the Business Practices that have been posted for customer review. Powerex submits the following comments for Bonneville's consideration:

TSR Study and Expansion Process, Version 6

Powerex has observed that Sections I.5(a) and I.8(a) contain references to Section J.1 and Section K.1 (noted below) that do not exist in the Business Practice. It is unclear if there are additional requirements that need to be included in this business practice or if those requirements are listed in another business practice. It would be helpful if Bonneville could clarify and repost the correct references.

"5. The Customer must submit a follow-on Original TSR at least one (1) year prior to the Stop Date of the Initial Original TSR in order to retain the queue time of the Initial Original TSR.

*a. BPA will permit the submittal of a follow-on Original TSR after the one (1) year deadline if the follow-on Original TSR is submitted within 10 Business Days of the date that the Customer's Original TSR first meets the **requirements listed in Section J.1**"*

"8. The Customer must submit a follow-on Redirect TSR at least one (1) year prior to the Stop Date of the Initial Redirect TSR in order to retain the queue time of the Initial Redirect TSR.

*a. BPA will permit the submittal of a follow-on Redirect TSR after the one (1) year deadline if the follow-on Redirect TSR is submitted within 10 Business Days of the date that the Customer's Redirect TSR first meets **the requirements listed in Section K.1.**"*

Requesting Transmission Service, Version 40

Powerex requests further clarification regarding Section C.2(a). The Business Practice states that a customer at the time of TSR submission must indicate if it desires to have the TSR considered for Long Term Partial Service without Renewal or Deferral rights. Powerex believes that Bonneville should study both options (w/Renewal or Deferral, or w/o Renewal or Deferral) even if a customer does not submit a comment at the time of TSR submission.

Thank you kindly for considering our comments.

Sincerely,
Raj Hundal
Market Policy and Practices Manager