

May 4, 2021

RE: Consolidation of Transmission Service Business Practice, Version 1

Powerex appreciates Bonneville holding discussions with customers on the adoption of the new “Consolidation of Transmission Service” Business Practice. As noted in the customer call on March 17, 2021, Powerex is providing the following comments and questions in writing with respect to the Business Practice.

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As discussed on the March 17th customer call, Powerex is concerned with the explicit restriction in Section B.2., that a Resale reservation may not be included in a Consolidation TSR. Bonneville explained that this was NAESB standard and requested Powerex submit written comments on this issue such that Bonneville could consider the rationale and implementation of the restriction. Powerex appreciates Bonneville looking further into this concern.

Powerex appreciates and understands that a NAESB standard restricts resales from being included in a Consolidation request, and that original intent was to prevent resales where the Reseller and Assignee are the same customer. However, it is unclear to Powerex why all resales of like requests were excluded from consolidation in the NAESB standard. Powerex believes that the ability to consolidate all transmission types is important for Bonneville’s transmission customers. This restriction in the NAESB standard, as adopted in Bonneville’s draft business practice, will introduce inefficiencies for transmission customers, as well as for Bonneville. Powerex appreciates that there may be software limitations, but from the customer perspective, the firm transmission rights obtained under resale should not be treated any differently than transmission rights directly procured from the transmission provider. Inherently there is no difference in the curtailment rights (i.e. 7F) if one acquired a reservation directly from the provider, or from a reseller. Powerex hopes Bonneville can explore an alternative implementation of Consolidation that includes resales and therefore reduces administrative burden on customers and Bonneville.

Powerex is also has a clarification question with respect to the Section B.4. restriction on transferring a Consolidation Reservation to another Customer. It is common practice for a party to combine numerous transmission contracts through a consolidation request to facilitate their own scheduling practices. Given that, if a customer has consolidated requests for a longer term (such as 2-years), will it be possible for them to unwind the consolidation out in the future, after service has started (i.e. year 2 of service), to facilitate the ability to complete a transfer at that later date?

Thank you kindly for considering our comments and questions.

Sincerely,

Connor Curson,
Powerex, Trade Policy