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Sent: Thu 6/4/2015 10:50 AM

To: Tech Forum

Subject: Balancing Services Election Business Practice

On behalf of Tilghman Associates, I offer the following comments on the proposed Balancing Services Election Business Practice.

Tilghman Associates represents generator owners and generation developers with existing and potential generation projects within BPA's Balancing Area.

My primary concern with the business practice is that it is confusing for individuals who are not intimately familiar with BPA and its rate making schedule. Many of my clients have staff responsible for making the proposed elections who live and primarily work outside of the NW.

I offer the following suggestions to improve the clarity of the proposed business practice:

1. Add a background section which sets forth the underlying (but unstated) drivers of the timelines described in the business practice, including:

Rate cases every two years

Timeline of rate cases

Timing of Initial Proposal

Timing of Draft ROD

Other rate case timing issues implicit in the draft business practice

2. Specify whether the elections are expected to occur in odd or even years.

3. BPA should undertake responsibility for issuing a notice to customers of the need to make elections - with a reasonable time for response (30 days).

Thank you for the opportunity to submit these comments. I believe any or all of these changes would help individuals less familiar with BPA and its rate making practices to understand the proposed business practice and to provide BPA with the timely information it needs.

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