

Comments of Powerex Corp.
Partial Long-Term Firm Service Business Practice, Version 8

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Powerex Corp.	July 8, 2014

Powerex offers the following comments on Bonneville's Partial Long-Term Firm Service, Version 8 Business Practice.

While a two-business day limit for confirming a counteroffer isn't new to the revised practice, Powerex encourages Bonneville to use this update as an opportunity to align the timing requirements with those set out in NAESB Business Practice Standard WEQ-001 Table 4-2. The timing requirements for a customer to CONFIRM a COUNTEROFFER on OASIS for a Yearly PTP request has already been established at 15 calendar days.

Powerex encourages Bonneville to take a different approach to the OASIS processing of Yearly Service Offers, and suggests that when Bonneville offers an agreement for Firm Service to a customer, Bonneville ACCEPT or COUNTEROFFER the TSR on OASIS at the same time. This aligns the timing to execute the service agreement and confirm the request on OASIS to 15 calendar days. It allows the customer to CONFIRM the request on OASIS at any time during this window.

Bonneville has the ability to correct the status of TSRs on OASIS if they are CONFIRMED on OASIS but the customer does not execute the necessary Service Agreement.

Powerex believes this change is warranted, particularly as:

- 1) The existing process prevents the customer from being able to proactively confirm the TSR and must wait for Bonneville to change the status to COUNTEROFFER on OASIS; and
- 2) This places unnecessary risk on yearly service being DECLINED if key personnel are away when Bonneville sets the TSR to a COUNTEROFFER status.

Thank you for the opportunity to comment.