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Sent: Thursday, January 31, 2013 3:39 PM
To: Tech Forum
Cc: Holman, Mark; McWilliams, Michael; McDonald, Karen; Goodenough, Mike
Subject: Simultaneous Submission Window Business Practice

Powerex appreciates the thought and work Bonneville has put into developing a reasonable solution for the Simultaneous Submission Window requirement.

Powerex is seeking some clarification on Section D.1.a of the business practice which states that "BPA will run successive rounds of lotteries in which a Customer can have (1) request in each round until there are no more requests to be processed." Powerex is concerned that the limitation of 1 request per customer for each lottery round could unnecessarily disadvantage customers whose breadth of business relies upon procuring transmission on multiple, independent paths. Powerex encourages Bonneville to have independent lotteries for service sought on the network and unique contract paths, such as on the COI and PDCI, as they are not in competition with one another. Unless this occurs, if a customer requires service on multiple, independent transmission segments, they could be subjected to waiting for a third lottery round of processing to occur before each is considered. This creates an unfair situation where one customer that needs all three is limited in a round against a customer who only requires one and will always be processed in the first round.

Powerex also believes BPA should make it clear in the business practice that it expects the integrity of the lottery process to be maintained by participants. In this regard, BPA should specifically provide that it is unacceptable for customers to attempt to violate the spirit of the process by arranging for themselves and one or more of their affiliates to submit multiple requests for the same constrained path or making pre-arrangements with other customers to request transmission in a Window with an arrangement of re-assigning it to one another once it has been awarded. BPA should monitor the lottery process to ensure this does not occur and may need to amend the business practice at a later date if it learns that such practices are taking place.

Thank you for the opportunity to comment on this business practice.

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