

April 13, 2022

**RE: BPA's Concurrent Loss Return Service Customer Workshop**

Powerex appreciates the opportunity to comment on the presentation and workshop material from March 30, 2022, regarding the Concurrent Loss Return Service. Powerex offers the following comments for Bonneville's consideration:

- Powerex appreciates Bonneville staff presenting their proposals for customer comments. Based on the presentation there appears to be an outstanding question regarding Dynamic Transfer and Pseudo-Tie Transactions. Powerex understands that the loss obligation will be calculated based on the Energy Profile and customers may deliver that obligation physically. Any deviation from the Energy Profile will be considered loss imbalance and settled financially. This approach appears to be appropriate for the under delivery of loss obligations, but this does not address the situation when the dynamic dispatch, including ATF adjustments, is lower than the Energy Profile resulting in a customer over supplying the loss obligation. Could Bonneville please clarify how the oversupply of losses will be reconciled or credited back to the transmission customer?
- Powerex appreciates Bonneville staff highlighting various scheduling timelines associated with the delivery of losses. Powerex notes that when Bonneville enables Preemption and Competition down to an hourly level, customers will be restricted in performing redirects and consolidation of hourly requests that are within a conditional window. Customers may not be able to, or be reluctant to, e-tag on hourly rights in preschedule until the underlying transmission rights are no longer conditional. This will likely result in significant activity in the final hour of the preschedule day.

Bonneville's OATT outlines the conditional reservation deadline of 2pm for hourly service, but the loss obligation postings will only be updated hourly in Preschedule (2pm, 3pm, etc). This could be quite problematic because there may be significant eTagging after 2pm and customers will not receive the corresponding loss obligations from Bonneville until 3pm. Bonneville needs to carefully take these conditional scheduling deadlines, which were not depicted on Slide 25 and 27, into consideration.

Powerex suggests that Bonneville consider moving the OATT conditional deadline to an earlier time, such as 12 pm or prior, to allow transmission customers adequate time to tag their transmission once it is unconditional. This would also allow the appropriate tagging of loss obligations in preschedule after the conditional deadline.

Thank you kindly for considering our comments.

Sincerely,

Raj Hundal  
Director, Market Policy and Practices