

April 17, 2020

RE: BP-TC-EIM Phase 3 Alternative Proposed Timeline

Powerex appreciates the continued efforts of Bonneville to engage its stakeholders on these topics. The current monthly workshop schedule has been effective and has allowed stakeholders to be engaged on a regular basis. It has also allowed stakeholders to provide timely and frequent feedback on topics presented by Bonneville.

Powerex also recognizes the benefit of Bonneville providing a more complete proposal for discussion purposes, but is concerned that the condensed schedule as proposed could be quite onerous on Bonneville and its stakeholders. Powerex is concerned that waiting until the July workshop to review a more comprehensive draft proposal may not allow for meaningful feedback from stakeholders on important topics. This approach has the possibility of leading to delays in completing the Initial Proposal by November due to the number of workshops, comment periods and iterative revisions to the draft proposal.

Powerex is aware and supportive of an alternative schedule being put forward by Public Power Council (PPC) and Northwest Requirements Utilities (NRU) that suggest Bonneville cancel the May workshop and develop a more comprehensive draft proposal for the June workshop. Powerex also supports removing the need to produce redlined tariff revisions and rate schedules by June, and additionally suggests producing those redlines for the July or August workshop. This modified approach to the workshop schedule would allow Bonneville more time to develop their proposal, while allowing stakeholders to receive an initial preview of the draft proposal in June and provide meaningful feedback on the general nature of the proposal.

Powerex would be open and willing to discuss the alternative workshop schedule with Bonneville and other stakeholders.

Bonneville's alternative timeline also indicates that it would release an EIM Phase III decision document in late October 2020. Powerex would appreciate Bonneville providing greater clarity on which policy decisions will be made in this decision document and how customers will be able to provide input in advance of any final Bonneville decision on these policies.

Lastly, Powerex understands that the proposed alternative timeline will not affect the workshops that are scheduled for TC-20 Implementation, IPR, and other matters.

Sincerely,

Raj Hundal

Market Policy and Practices Manager