

Sept 23, 2019

RE: ATC Methodology and application of De Minimis Impact Dead-Band for Network Flowgates

Powerex appreciates Bonneville raising the de minimis impact dead-band for network flowgates issue at the August 6, 2019 TC-20 implementation presentation. Powerex also appreciates Bonneville soliciting comments from customers on this important topic, and Powerex respectfully submits the following comments.

Powerex believes that it is one of many customers that has concerns with Bonneville's application of the de minimis impact dead-band tests. Powerex has experienced unexpected and detrimental impacts from Bonneville's current application of the de minimis impact dead-band tests, and that timely action by Bonneville is warranted to address the issue.

In addition to the unison of customer concern, Powerex believes that addressing its previously articulated concerns over application of the de minimis tests is sound policy, given that the de minimis impact dead-band issue came to light only as an unintended consequence of a recent transmission policy implementation from TC-20. As a result of the broad and unexpected customer impacts it would be warranted for Bonneville to prioritize the work for this issue, and continue to collaborate with customers through workshops to reach a quick resolution. Powerex believes that the OATT principles should remain true regardless of the service type (original vs. redirect), service increment, or duration, especially for the application of the de minimis dead-band tests. The current implementation is causing unnecessary harm for customers over small and inconsequential quantities that have a negligible impact to the transmission system.

Powerex looks forward to further discussion and participation in workshops and stakeholder processes on this topic.

Sincerely,



Raj Hundal
Market Policy and Practices Manager