

July 29, 2026

RE: Proposed Revisions to Deferral of Transmission Service Business Practice V24

Powerex appreciates the opportunity to provide comments on the customer proposed revisions to the Deferral of Transmission Service Business Practice. After reviewing the posted materials and participating in the stakeholder workshop held on June 30th, Powerex does not support advancing these revisions at this time.

The workshop surfaced a number of substantive questions that remain unresolved, particularly regarding the scope of the proposed changes and their potential impacts on BPA's operations, related industry systems, and established industry standards. Powerex, as well as other customers, requested that BPA conduct and share a comprehensive impact assessment before this proposal proceeds further. The assessment should also include an analysis of the costs associated with implementing the proposed changes, including any system modifications or operational adjustments required by BPA. Absent that analysis, stakeholders are not in a position to fully evaluate the merits of the revisions or assess their broader implications. Moving forward without this foundational work would be premature.

As part of that assessment, Powerex specifically requests that BPA address the proposal's consistency with NAESB standards. It is important that BPA outline the applicable standards, any changes that may be required to those standards, and any deviations BPA may need to undertake in order to implement the proposal. Based on Powerex's understanding from the stakeholder workshop, the proposal would effectively break an established parent-child transaction relationship, leaving orphaned redirects that may face issues with start time alignment to the parent transaction. These types of scenarios raise important questions about NAESB conformance that BPA should analyze and present to stakeholders, as this is a critical input to any informed evaluation of the proposal.

Powerex looks forward to engaging in a future workshop on this topic after reviewing BPA's impact assessment. Once that information is available, customers will be better positioned to provide more comprehensive comments and weigh the potential benefits and disadvantages of the proposed revisions.

Kind Regards,



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