

June 13, 2025

RE: Proposed amendments to Bonneville's Conditional Firm Service (CFS) Business Practice Version 30

Powerex appreciates the opportunity to comment on the proposed amendments to the Conditional Firm Service Business Practice.

Powerex understands and is supportive of Bonneville's intent behind removing the termination right for customers whose Bridge CFS is converted to Reassessment CFS, where the customer has not continued participating in the necessary upgrades. This appropriately links termination rights to upgrade participation.

However, we recommend a refinement to ensure fairness for customers who continue to meet all participation requirements but are ultimately unable to achieve Firm service due to decisions outside their control—namely, Bonneville's determination not to proceed with system upgrades. In such cases, the customer should retain the option to terminate their agreement upon conversion to Reassessment CFS. This change helps maintain shared accountability and incentives for pursuing necessary upgrades.

We believe this clarification would be beneficial and appropriately distinguishes between customer-driven and Bonneville-driven outcomes and ensures that parties who remain committed to the upgrade process are treated fairly.

Thank you for considering our feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Raj Hundal".

Raj Hundal
Director, Market Policy and Practices