



Bonneville Power Administration

**Customer Comments on the BPA
Stakeholder Meeting addressing the
Imbalance Service public process
April 11, 2014
Comments Received from**

Powerex

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At the April 1, 2014 Generation Inputs Workshop, BPA set out several alternatives for “a sustainable approach that makes sense for determining imbalance service rate case inputs.” BPA stated that “drivers for change” include simplification of the rates process, separation of tariff terms and conditions from rates, and compliance with FERC’s November 21, 2013 order stating that BPA “should incorporate the process it intends to use to set the level of imbalance service that it will provide in its OATT and not in individual rate cases.” BPA seeks comments regarding a separate public process, outside of the BP-16 rate proceeding, for dealing with imbalance service issues.

Subsequent to the April 1 Generation Inputs Workshop, BPA announced an ACS Practices and Settlement Agreement Workshop, to be held on May 13, 2014.

Powerex commends BPA for considering a comprehensive approach to imbalance service issues. Powerex conceptually supports BPA’s Alternative 4 for a separate public process, and believes that an examination of all issues regarding imbalance services is warranted. In that regard, Powerex urges BPA to: (i) define the parameters of this separate public process as soon as practicable; and (ii) consolidate this initiative with the May 13 ACS Practices and Settlement Agreements Workshop, so that all ACS issues can be dealt with in a comprehensive and coordinated process.