

August 20, 2018

Powerex appreciates the opportunity to comment on the draft *Unauthorized Increase Change (UIC) Business Practice, Version 3*, as posted on August 5th, 2019.

Powerex believes that there are issues with only looking at the **Transmission Service Type (service code)** when grouping reservations to determine UIC (Section A.1). The implementation of BPA's proposed modification to the business practice will result in differentiation between various service increments of firm transmission, despite all firm transmission having the same curtailment priority. There does not appear to be appropriate justification provided as to why BPA would differentiate between daily, monthly or yearly Firm service since it is considered to be the same priority. Furthermore, Powerex has discovered that there are issues with how the blanket tagging functionality assigns usage to AREFs, and we believe that this proposed change could lead to charges even though the customer has secured enough firm transmission on the specified path.

Powerex therefore believes that the changes proposed require further refinements. Powerex proposes that A.1. be modified as follows:

**A. Billing of the UIC Amount**

- 1. A UIC will be issued on the transmission bill when a schedule or schedules exceeds the *total reservation capacity rights by NERC Priority Code (documented as NERC Priority on the Reservation) on a Point-of-Receipt (POR) to Point-of-Delivery (POD) path.***

We believe the modification proposed above would address Powerex's concerns.

Sincerely,

Connor Curson  
Trade Policy, Powerex Corp.