

Response to Comments – Conditional Firm Service

BPA Transmission Business Practice

Version 30
Posted 7/14/2025

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Version 30

This document contains comments and BPA responses regarding Version 30 of the Conditional Firm Service Business Practice posted for comment from May 30, 2025 to June 13, 2025.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. Powerex Corp.

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.

BPA Response

Bonneville appreciates Powerex submitting comments in support of the proposed edits to the Conditional Firm Service Business Practice.

Bonneville has updated the CFS Business practice to clarify that the customer is not required to take Reassessment CFS when Bridge CFS terminates due to Bonneville's determination not to proceed with system upgrades. Thank you for your comment.

BPA removed the system upgrade language from Section D.3.a, further clarified D.3.a.i and D.3.a.ii, removed "contract" from the last sentence in D.3.a.i and added "relevant reservation." BPA also added Section D.3.b.

3. Conversion of Bridge CFS to Reassessment CFS:

- a. ~~If the system upgrade(s) specified in the CFS Exhibit Table will not be completed or if~~ the Customer does not satisfy any ~~of the~~ requirements to continue participating in the necessary system upgrades for Bridge CFS, BPA will provide notice to the Customer consistent with the terms in the Customer's CFS Exhibit Table.
 - i. ~~A Customer with an CFS Exhibit Tables for new Bridge CFS or a renewal of existing Bridge CFS~~ executed on or after October 28, 2024, will be notified of the effective date of the conversion from Bridge CFS to Reassessment CFS. ~~Such notification does will not initiate an opportunity for contract termination of the relevant reservation.~~
 - ii. ~~A Customer with an CFS Exhibit Tables for Bridge CFS~~ executed prior to October 28, 2024, will be notified of the termination of the Bridge CFS ~~on effective~~ the first day of the month at least 90 Calendar Days from the date of the notice.
 1. The Customer may request Reassessment CFS by providing written notice to BPA at least 30 Calendar Days prior to the effective date of the termination of Bridge CFS. If the Customer provides such notice, Bridge CFS will remain in effect while BPA performs an evaluation to determine if it can reliably offer Reassessment CFS and BPA and the Customer complete the actions to accomplish conversion to Reassessment CFS.
 2. If Reassessment CFS is offered, the Reassessment CFS Exhibit Table will reflect any modifications to the conditions.
- b. ~~If BPA decides not to complete the necessary system upgrade(s) for the conversion from Bridge CFS to LTF Transmission Service as provided in the Customer's CFS Bridge Exhibit Table, BPA will provide notice to the Customer, and the Customer may request Reassessment CFS, consistent with the process in Section D.3.a.ii.~~
- iii-c. _____ For any reservation that is converted from Bridge CFS to Reassessment CFS, the provisions of BPA's OATT and this business practice will govern the converted reservation, and the Number of Hours or System Conditions will be subject to reassessment on a biennial basis as provided in section D.4.a.