

# **Bonneville's Business Practice Process**

## **1. Introduction**

The intent of this Business Practice Process is to facilitate the exchange of ideas and information regarding maintenance and modifications to Bonneville's business practices associated with its open access transmission tariff (Tariff) in as transparent a way as possible so that Bonneville can make decisions in consideration of stakeholder comments, including the effect of proposed changes on stakeholders. The Business Practice Process describes the process Bonneville shall utilize to consider any change to an existing transmission business practice, including any addition, edit, deletion, revision, or clarification to a transmission business practice, or its attachments and exhibits, and any new transmission business practice associated with the Tariff ("Proposed Business Practice"). The Business Practice Process will not be used to adopt or change Bonneville's Tariff terms and conditions.

## **2. Bonneville Contact Information**

Bonneville shall post on its external business practice website ("Bonneville Website") the applicable Bonneville email address, mailing address, and telephone number for communication, such as the submission of business practice requests or comments regarding Proposed Business Practices and the Business Practice Process.

## **3. Entities Authorized to Submit and Comment on a Proposed Business Practice**

The following entities may submit a Proposed Business Practice:

- (a) Bonneville;
- (b) Any Eligible Customer as defined in Bonneville's Tariff, as may be revised from time to time, or its representative ("Eligible Customer").
- (c) Any other entities with a relevant interest in the Proposed Business Practice ("Interested Entity"). Such entity will explain its interest to Bonneville in sufficient detail to permit Bonneville to conclude that it has a relevant interest in the Proposed Business Practice.

## **4. Business Practice Revision Procedure**

### **4.1. Initiation of a Proposed Business Practice**

Bonneville may propose modifications to existing business practices or propose new business practices. Bonneville shall send a tech forum notice and post Proposed Business Practices to the Bonneville Website.

An Eligible Customer or Interested Entity may submit Proposed Business Practice requests electronically to Bonneville by completing a designated form provided on the Bonneville Website. Bonneville shall provide an electronic return receipt response to the submitter upon receipt of the Proposed Business Practice. Any Proposed Business Practice shall be considered complete provided that it includes at least the following information:

- (a) Description of requested revision;
- (b) Reason for the suggested change;
- (c) Impacts and benefits of the suggested change on Bonneville and stakeholders, to the extent that the submitter may know this information;
- (d) List of affected business practice sections and subsections;
- (e) General administrative information (organization, contact name, etc.);
- (f) Suggested language for the requested revision;
- (g) Suggested category type of the Proposed Business Practice as further discussed in Section 4.4.1; and
- (h) If the submitter is an Interested Entity, an explanation of the entity's interest in the Proposed Business Practice in such detail to permit Bonneville to conclude that the entity has a relevant interest.

Bonneville shall review any Proposed Business Practice submitted by an Eligible Customer or an Interested Entity for completeness and shall notify the submitter within ten (10) business days of receipt if the Proposed Business Practice is incomplete, including the reasons for such status. Bonneville may provide information to the submitter that will correct the Proposed Business Practice and render it complete. An incomplete Proposed Business Practice may not receive further consideration until it is completed. In order to pursue the Proposed Business Practice, a submitter must submit a completed version of the Proposed Business Practice with the deficiencies corrected.

After Bonneville determines that the Proposed Business Practice is complete, Bonneville shall post the completed Proposed Business Practice to the Bonneville Website and send a tech forum notice of such posting within two (2) business days after it is completed or corrected.

#### **4.2. Content of Tech Forum Notice**

A tech forum notice is an email published by Bonneville in relation to a Proposed Business Practice. The tech forum notice to initiate a Proposed Business Practice shall provide at least the following information:

- (a) The Proposed Business Practice in its complete form (either attached or as a link to the Bonneville Website);
- (b) Category type of the Proposed Business Practice (see Section 4.4);
- (c) Proposed effective date for the Proposed Business Practice;

- (d) Date, time, and remote access capability for the Proposed Business Practice stakeholder meeting or conference call established under Section 4.5.1, along with any reference material that Bonneville determines may be relevant or helpful;
- (e) Comment deadline following the Proposed Business Practice stakeholder meeting or conference call under Section 4.5.3; and
- (f) Contact information for Bonneville or the submitter of the Proposed Business Practice.

#### **4.3. Withdrawal of a Proposed Business Practice**

Bonneville may withdraw a Proposed Business Practice at any time by providing notice of such withdrawal through a tech forum notice with an explanation for the withdrawal. The submitter of a Proposed Business Practice may withdraw its Proposed Business Practice at any time upon written notice to Bonneville that includes an explanation for the withdrawal. Bonneville shall send a tech forum notice within five (5) business days of Bonneville's receipt of a submitter's withdrawal notice. If the Proposed Business Practice has been posted on the Bonneville Website, Bonneville shall post a notice of the withdrawal when it sends the related tech forum notice. If Bonneville or any other Eligible Customer or Interested Entity believes that the Proposed Business Practice should receive further consideration, that entity may adopt the Proposed Business Practice and become the submitter of record by providing written notice to Bonneville within five (5) business days after Bonneville sends the tech forum notice about the withdrawal.

#### **4.4. Scope of Proposed Business Practices**

##### **4.4.1. Types of Proposed Business Practices**

Bonneville shall preliminarily classify each Proposed Business Practice according to the categories below. Bonneville may reclassify the Proposed Business Practice as appropriate after further consultation with the submitter (if not Bonneville) and potentially affected stakeholders in the Proposed Business Practice review process. Types of Proposed Business Practices include:

- (a) **Category A** - Clarifications of existing business practice language, grammatical errors, and/or revisions with minor significance.

Except as provided in Sections 4.4.2 and 4.4.3, for Proposed Business Practices falling in Category A, Bonneville will adopt the proposed changes if reasonably acceptable to Bonneville and Bonneville receives no adverse comments by the applicable comment deadline. These proposed changes will become effective upon adoption by Bonneville, unless otherwise stated in the written notice.

- (b) **Category B** - Material revisions to existing business practices and new business practices.

Except as provided in Sections 4.4.2 and 4.4.3, Category B Proposed Business Practices include material revisions to existing business practices and new business practices associated with (1) terms and conditions in Bonneville's Tariff and existing policies; and (2) proposed new terms and conditions for Bonneville's Tariff and new policies.

- (c) **Category C** - Proposed Business Practices that are necessary to address emergencies or an urgent need as set out in Section 5.

As provided in Section 5, Bonneville may propose and implement a Proposed Business Practice if it is necessary for Bonneville to respond to an urgent or emergency reliability, system security or statutory obligation that cannot reasonably be deferred until after the Proposed Business Practice Process is completed or the next rate case or tariff proceeding, as the case may be. Category C Proposed Business Practices that would significantly affect Bonneville's rates or terms or conditions of service, shall be implemented only on an interim basis until permanently adopted by Bonneville pursuant to Section 4.4.2(b).

#### **4.4.2. Changes to Bonneville's Tariff Through a Business Practice or Other Non-Tariff Document**

Bonneville shall not change the terms and conditions of service provided in its Tariff through a business practice or other non-tariff document. If any Proposed Business Practice or other non-tariff document would significantly affect Bonneville's rates or terms or conditions of service, then

- (a) In the case of Category A or Category B Proposed Business Practices or other similar non-tariff documents, such Proposed Business Practice or other non-tariff document or portion therein shall not take effect until the related tariff changes are reflected in Bonneville's rates or Tariff, as the case may be; and
- (b) In the case of Category C Proposed Business Practices or other similar non-tariff documents, Bonneville shall consider the Proposed Business Practice in Bonneville's next proceeding conducted pursuant to Section 212 of the Federal Power Act (Section 212 proceeding) or rate case, as the case may be, for adoption on a permanent basis.

Precedent from the Federal Energy Regulatory Commission (FERC) regarding when a public utility must revise its tariff rather than adopt a business practice, although not legally binding on Bonneville, constitutes an important factor in Bonneville's consideration in resolving questions of whether a Proposed Business Practice or other non-tariff document would significantly affect rates, terms or conditions of service.

### **4.4.3 Timing of Effectiveness of Proposed Business Practices Implementing Tariff or Rate proposals**

Except as provided in Section 4.4.2(b), if a Proposed Business Practice will implement (a) Tariff proposals in a Section 212 proceeding; or (b) rate proposals in a proceeding conducted pursuant to Section 7(i) of the Northwest Power Act, the Proposed Business Practice will not take effect until after the Tariff or rate proceedings adopting such proposals are concluded, unless urgent or emergency circumstances exist.

## **4.5. Proposed Business Practice Process**

### **4.5.1. Proposed Business Practice Stakeholder Meetings or Conference Calls**

For Category A Proposed Business Practices, Bonneville will not establish Proposed Business Practice stakeholder meetings or conference calls, unless Bonneville determines that such meetings or conference calls are necessary or desirable.

For Category B Proposed Business Practices, Bonneville will establish Proposed Business Practice stakeholder meetings or conference calls within six (6) business days after the tech forum notice initiating the Proposed Business Practice is sent.

For Category C Proposed Business Practices, Bonneville will establish Proposed Business Practice stakeholder meetings and conference calls as soon as practicable after the tech forum notice initiating the Proposed Business Practice is sent.

The Proposed Business Practice stakeholder meetings or conference calls will provide an opportunity for stakeholders to discuss Proposed Business Practices with Bonneville subject matter experts and to receive answers to questions regarding the Proposed Business Practices from such experts. Proposed Business Practice stakeholder meetings will include remote access capability. If circumstances warrant, Bonneville will schedule additional discussions of such Proposed Business Practices at subsequent meeting(s) or conference calls.

### **4.5.2. Optional Discussion**

Eligible Customers or Interested Entities may request discussion on whether a Proposed Business Practice (a) significantly affects terms and conditions of service; or (b) should be proposed as a new Tariff term and condition in a Tariff Proceeding and not a Proposed Business Practice in the Business Practice Process. An Eligible Customer or Interested Entity may request this discussion in its comments on the Proposed Business Practice submitted in accordance with Section 4.5.3.

### **4.5.3. Comment Deadlines for Proposed Business Practices**

The comment deadline for Category A Proposed Business Practices is ten (10) business days after Bonneville sends the applicable tech forum notice. The comment deadline for Category B Proposed Business Practices is twenty (20) business days following the last Business Practice stakeholder meeting or conference call to address such Proposed Business Practice. The comment deadline for Category C Proposed Business Practices is ten (10) business days

following the last Business Practice stakeholder meeting or conference call to address such Proposed Business Practice, unless otherwise shortened by Bonneville.

Bonneville may, at its discretion, extend the standard comment period for a Proposed Business Practice, such as if the volume or complexity of changes warrant additional stakeholder review, in circumstances when a significant number of Proposed Business Practices are simultaneously posted for comment, or after the optional discussion as set forth in Section 4.5.2.

Bonneville shall post comments submitted in accordance with the instructions in the tech forum notice to the Bonneville Website within two (2) business days of submittal.

#### **4.5.4. Bonneville's Response to Comments and Decision**

Within twenty (20) business days following expiration of the applicable comment deadline, Bonneville shall post its response to comments and its decision on each Proposed Business Practice to the Bonneville Website. Bonneville will send a tech forum notice as soon as practicable if Bonneville requires more than twenty (20) business days to respond to comments or if Bonneville has determined that additional stakeholder meetings or conference calls are required. Such written notice will indicate the date Bonneville expects to post its response and, if applicable, the date and time of additional stakeholder meetings and conference calls.

Bonneville's response to comments shall include:

- (a) Identification of the submitter of the Proposed Business Practice (if not Bonneville);
- (b) Identification of the authorship of comments and a written response to each timely-submitted comment;
- (c) Bonneville's decision on the Proposed Business Practice, including an explanation of the reasons, if any, for modifications to the language of the initial Proposed Business Practice; and
- (d) The final business practice
- (e) Effective date for the applicable business practice.

Bonneville's final agency action is on the date Bonneville posts the final business practice on the Bonneville Website.

### **5. Category C: Emergency or Urgent Requests for Proposed Business Practices**

Bonneville's classification of a Proposed Business Practice as Category C may be based on a good faith determination that such Proposed Business Practice:

- (1) requires immediate attention due to urgent or emergency operational, security, or reliability concerns; or

- (2) is necessary to comply with a statutory obligation.

If Bonneville classifies a Proposed Business Practice as Category C, Bonneville may unilaterally make and implement revisions to its business practices without complying in advance with the Proposed Business Practice process in Section 4. As soon as practicable, Bonneville shall send a tech forum email and schedule a Proposed Business Practice stakeholder meeting or conference call and initiate the process described in Section 4 with respect to the Category C change.

Notice of a Category C Proposed Business Practice shall be posted on the Bonneville Website and communicated through a tech forum.

## **6. Modifications to this Business Practice Process**

- 6.1 Bonneville may modify this Business Practice Process from time to time only after proposing the change in a Section 212 proceeding and making a final decision with respect to the change in that proceeding.
- 6.2 The Administrator may unilaterally modify this business practice process if required by applicable law or to comply with applicable law without complying in advance with the process set forth in Section 6.1. As soon as practicable after such unilateral modifications, Bonneville shall initiate the process described in Section 6.1.
- 6.3 Notwithstanding Section 6.1 above, Section 4.4.2 of this Business Practice Process may not be modified earlier than October 1, 2028.

## **7. Reservation of Rights**

Nothing contained in this Business Practices Process shall constitute a waiver or relinquishment by Bonneville or any stakeholder of any rights or remedies provided by applicable law. Without limiting the generality of the foregoing, neither this Business Practices Process nor the adoption or implementation of any Business Practice pursuant to this Business Practice Process shall limit or preclude any right under applicable law (i) to challenge any Business Practice in any regulatory or judicial forum or (ii) to seek any remedy from Bonneville in any regulatory or judicial forum arising out of adoption or implementation of any Business Practice.