

Shell Energy North America (US), L.P. provides the following feedback to BPA with respect to recent changes to the TSEP process.

- Shell appreciates the need for more precise data requirements for TSEP requests given the proliferation of transmission service requests at present and likely into the future. Shell supports BPA in establishing more definitive requirements for the TSEP process with caveats.
- BPA's proposal to allow only 5 business days for TSEP cure is not adequate; Shell suggests a 30 calendar day cure is more prudent in the first 2 years of this policy change or until more data is available.
- BPA should develop an appeals process should an LSE/affected system not respond to a demonstrated 'need'. The alternative pathways for a Tx customer are largely undefined and nebulous.
- BPA needs to recognize this policy change was announced with little recourse and effective retroactively; these types of large shifts in policy without recourse for Transmission Customers does not engender trust between the Tx customers and BPA. Shell recognizes the need for change; however the 'how' really matters when implementing changes such as these. The process and timeline for these announcement is seriously lacking.

Thanks for understanding our nuanced perspective.

*Ian D. White*

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