Bonneville Power Administration

Joint Registration Organization (JRO)

Oct. 16, 2007

Description of JRO option

- BPA will become a Joint Registration Organization (JRO), as a Load Serving Entity (LSE) and Distribution Provider (DP) on behalf of customers that:
 - o Choose this approach (some may register themselves)
 - o Do not have any responsibilities beyond that of LSE and DP (i.e. not PSE, TO, GO)
 - o Are less than 100 MW peak load
 - o Are Full or Simple Partial Requirements Customers
- BPA will not register on behalf of a customer until the delegation agreement is signed
- BPA will not undertake new functional responsibilities for meeting standards beyond those it already carries out today.
- Customers will be responsible for any sanctions imposed for, or damages caused by, failure on their part to meet the requirements. BPA will be responsible for its failures to comply.
- BPA will not provide legal representation for customers in penalty proceedings before WECC, NERC and FERC.
- The delegation agreement will terminate on September 30, 2010.
- The delegation agreement will provide that the customer has responsibility for new standards/requirements imposed during term of agreement, unless BPA agrees to amend the delegation agreement to incorporate the new requirements and the customer agrees to pay the incremental costs associated with the additional requirements.
- If a customer fails to perform according to the delegation agreement, BPA will de-register on their behalf.
- Customers who choose this alternative will compensate BPA for costs associated with JRO administration and any additional requirements that BPA may agree to take on.

Examples of JRO Services that BPA will provide under this agreement:

- Registration submittal on customers behalf
- Response to data requests from WECC: coordinated with customer
- Annual registration report to WECC
- Audit preparation: gather documentation from customer, coordinate and present as part of registered functions for on-site audits every three years. Next audit: Jan. 28-Feb. 1
- Monitoring of customer compliance with standards which it implements but for which BPA is responsible to WECC
- Self-reports and mitigation plans: coordinated with customers on compliance issues found by utility or BPA
- Self-certification: according to BPA schedule
- Response to spot checks: following self-certification

Eligible customers may choose this option until May 2008