BPA Formal Comments for R15005 – Modification of DUNS number treatment in OASIS BPA appreciates the opportunity to comment on this recommendation. BPA believes that we can support the NAESB Recommendation to alter the requirement of having a unique DUNS number for each customer, as long as the DUNS number functionality that allows TP’s and TC’s to use the functionality as they currently do. Additionally, BPA believes that the following items are essential in order for BPA so support the Recommendation:

1. TP’s that have a need to validate the DUNS number to perform business must still be able to require their customers to obtain and use on OASIS their valid DUNS Number.
2. The Recommendation will not be used to support the removal of the Data Universal Numbering System (DUNS). This is a unique nine digit identification number for each physical location of a business issued by Dun & Bradstreet and will create a significant number of technical, system and financial issues for BPA(see Items 3 and 4 below).
3. The Privacy Act of 1974 and the Debt Collection Improvement Act of 1996 requires federal agencies to request and use a DUNS number for accounting purposes and for proper identification of the entity wishing to do business with the federal entity. Therefore if this recommendation allows for customers to conduct business without a DUNS number, BPA could only support that standard if TP’s are still allowed to require the DUNS number if that customer wishes to also do business with a federal entity that is required by law to collect this information.
4. For the TP’s that will still require the DUNS number, the EIR will need to be editable and be able to manage and track appropriate customer data to both the temporary DUNS and final DUNS number. BPA has several systems that pull in the DUNS number from the EIR database and uses this info to make the appropriate relationship within their systems between the DUNS, NERC Code and the customer. This is essential in identifying properly the customer that BPA is establishing a relationship with.

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