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Submitted to: communications@bpa.gov

In response to Bonneville Power Administration's ("BPA's") March 9 workshop and comments response matrix, Northwest Requirements Utilities ("NRU") submits these comments to inform BPA's Financial Plan Refresh process. NRU represents the interests of 56 Load-Following customers located in 7 states across the region that hold Network Transmission contracts with BPA. NRU's members contract with BPA for almost 30% of BPA's Tier 1 load. Of primary importance to NRU members is BPA's ability to offer affordable and reliable power supply and transmission that maximizes the value of the Federal system for the benefit of preference customers.

NRU supports the concepts presented at the March 9 workshop in both the BPA presentation and the Public Power Council and Snohomish Public Utility District presentation to increase budget and project execution. NRU lauds BPA's commitment to improving its execution compared to rate case forecasts. NRU is interested in hearing from BPA whether the metric enhancements proposed by the Public Power Council and Snohomish appear to provide a good start to achieving its commitment.

NRU would also like to provide further thoughts regarding parameters to guide BPA's developing policy around revenue financing. As offered in the March 9 workshop, NRU is interested in exploring parameters that would apply to years in which customers may receive refunds associated with surplus financial reserves. Currently BPA's proposal focuses on limiting the amount of revenue financing to less than a 1% rate increase, considering years in which the Cost Recovery Adjustment Clause may be triggered to collect additional funds from customers. NRU recommends that, in years in which customers may receive a refund associated with surplus financial reserves through the Reserve Distribution Clause, the Administrator retain discretion to allocate the surplus reserves to pay down debt up to a certain dollar amount, and anything exceeding that point to partially be allocated to debt and partially allocated to a customer refund. We would welcome opportunities to explore this concept.

Thank you for considering these comments. We look forward to continuing to work with you through this financial refresh process.

Sincerely,

/s/ Tashiana Wangler

Tashiana Wangler
Rates and Policies Director