

## Comments in response to

BPA's Provider of Choice Workshop held December 12, 2022

Submitted via email at [post2028@bpa.gov](mailto:post2028@bpa.gov)

Wells Rural Electric Company (WREC) encourages BPA to either create new or retain highly effective current policies, which recognize the obstacles Preference, Load Following, and transfer customers face in developing, constructing, administrating, and operating non-federal resources and other alternatives for load service. Upon this recognition, it is WREC's desire that BPA will continue to provide support to transfer customers for the reason that it benefits all of BPA's customers, when alternative resources or pathways, that are either located closer to load or from an alternate source located within the region, can be acquired at a significantly reduced price as compared to transferring from the fully subscribed FCRPS over single and even multiple constrained pathways on fully subscribed third-party transmission systems. This approach of maximizing alternative resources will reduce the upward pressure on the federal system, transfer systems, and utilities throughout BPA's Balancing Authority. WREC asks that BPA's Provider of Choice team review and retain policies that assist with the integration of non-federal resources and other similar alternatives with traditional federal products and services, because it is mutually beneficial to both BPA and its customers, alike.

WREC supports the concept of "equivalent treatment" for transfer customers to be comparable to the service provided to directly connected customers and urges BPA to continue this long-standing practice from the Regional Dialogue contract and policies. This approach also maintains the current level of service that BPA has provided to its transfer customers for the past 20 years. To deviate from this current level of customer service, would be viewed as a significant departure from current established practices, in which most transfer customers hope to see captured in the Post-2028 power sales agreements. WREC strongly continues to support the principle of "comparability" as outlined in the Agreement Regarding Transfer Service (ARTS), especially if the only viable alternative for meeting load obligations is transfer service. Transfer, as a whole, continues to be the fiscally prudent option and is estimated to save \$350 million annual in transmission costs and more than \$3.7 billion total capital costs.

WREC strongly opposes directly assigning Transfer Service costs for federal or non-federal resources, BPA's proposed policy of directly assigning these costs creates an unnecessary disincentive for non-federal resource investment.

Respectively submitted,

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