

February 7, 2023

Bonneville Power Administration  
905 NE 11<sup>th</sup> Ave.  
Portland, OR 97232

*Submitted electronically: Post2028@bpa.gov*

**RE: January 24-25 Provider of Choice Post-2028 Workshop Comments**

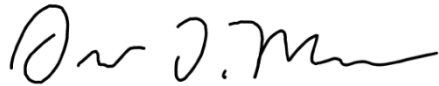
Public Utility District No. 2 of Grant County (Grant PUD) commends the Bonneville Power Administration (BPA) for its thoughtful proposal and model that was presented at the Provider of Choice (PoC) Workshop on January 24-25, 2023. BPA's foundational policy elements and building blocks are a solid start and illustrates BPA's careful consideration of the comments it received from customers. Grant suggests the following enhancements that we believe are consistent with BPA's intent of achieving fairness and balance in the PoC Draft Policy. These enhancements are consistent with those presented by the Public Power Council (PPC), of which Grant PUD is an active member. These include:

- System Size: Range 7000 to 7500 aMW (7000 + EPU 158 + Augmentation 0-342)
  - Broadest acceptance may be for 7,150 – 7,250 aMW
    - Tier 1 Rate neutral
    - Include EPU in Tier 1
- BPA's allocation proposal is generally acceptable and provides consideration for differently situated utilities.
  - 100% Headroom adjustment
  - 50% conservation adjustment
  - 25% load growth adjustment
- Augmentation Allocated Pro-Rata – Equal sharing of costs and risks.
- Fair and equitable base year
  - FY 2023 Base Year is workable with normalizing adjustments for industrial/commercial loads, weather, irrigation, etc.
- Consideration for small utilities.
- Set aside for Tribal utilities: BPA proposal of 40 aMW and for length of contract.
- DOE Richland – Potential service by Grant PUD with new Small Modular Reactor (SMR) backed by U.S. Department of Energy – currently 36.5 aMW, up to 70 aMW in TRM.

- Transfer service – Comparable treatment for federal and non-federal resources.
- Explore potential for comparable treatment of generating resources and conservation.
- Ensure public power receives full value of secondary sales.
- Asset Management and cost control commitments.

Thank you for your consideration of these comments. We look forward to the continued discussion on these topics in the PoC process.

Sincerely,



Andrew D. Munro  
Associate Chief Resource Officer