



Big Bend Electric Cooperative, Inc.

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February 9, 2023

John Hairston
Administrator and CEO

Suzanne Cooper
Senior Vice President of Power Services

Kim Thompson
Vice President of Northwest Requirements Marketing

Submitted via email to post2028@bpa.gov

Dear Administrator Hairston, Ms. Cooper, and Ms. Thompson:

Big Bend Electric Cooperative submits these comments to express support for the Northwest Requirements Utilities system size, allocation, and augmentation proposal (the "NRU Proposal"), which NRU submitted to the Bonneville Power Administration on February 8, 2023. The NRU Proposal is consistent with the Public Power Council's (PPC's) Framework and Considerations, which PPC presented to Administrator Hairston and other officials from the agency on February 2, 2023. However, the NRU Proposal provides specific guidance on several issues that will be critical to public power in the post-2028 era.

The NRU Proposal was carefully crafted using the BPA January workshop proposal as a starting point to provide benefits to *all* preference utilities, whether those utilities are experiencing load growth, have lost loads, maintain relatively flat loads, or have invested significantly in conservation during the Regional Dialogue contract. Furthermore, current modeling (based on BPA's January model and BPA's secondary revenue credit practices) shows that all preference customers would be better situated under the submitted NRU Proposal than under any of the other proposed models under consideration in the region.

The NRU Proposal represents a careful compromise between its members and strikes an *intentional, equitable* balance of benefits for all of Bonneville's preference customers. Big Bend Electric appreciates the delicate balance that the NRU Proposal achieves and urges Bonneville to incorporate it into its Provider of Choice policy as a basis for post-2028 power supply contracts that Big Bend Electric will sign.

Big Bend Electric has been active in the public power workgroups and the BPA workshops, we look forward to working with the region on the remaining important issues necessary for contracts which enable the region to support the many policy goals we are challenged to achieve. The construct of the Tier 2 federal *and* non-federal options, including resource integration, will be critical to our success – both on the local and regional levels.

Sincerely,

Christina Wyatt

Christina Wyatt
Manager of Power Supply