

# Peninsula Light Co.

*a mutual corporation*

October 31, 2022

Kevin Farleigh  
Bonneville Power Administration  
Post2028@bpa.gov

**RE: BPA's Provider of Choice Proposal Regarding Treatment of Customers' New Dedicated Resources**

Dear Kevin,

Peninsula Light has been participating in BPA's Provider of Choice workshops and appreciates the engagement by the agency with public power around the many important topics being discussed.

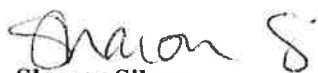
Peninsula Light is concerned about BPA's proposed treatment regarding customers' new, specified, dedicated resources. It is our understanding from the Provider of Choice workshops that BPA intends to re-designate customers' new, specified, dedicated resources to existing resources, therefore deducting the resource amounts from customers' CHWM calculations. This would create an untenable position for Peninsula.

Peninsula Light has an ownership share of the Harvest Wind project, and that generating facility terminates in 2029, at which point Peninsula's obligations to the project will cease. Due to the timing of a new BPA contract and Peninsula's Harvest Wind obligations expiring, we are asking for appropriate treatment of this resource. As part of the Provider of Choice initiative and post-2028 contracting process, Peninsula requests that BPA exclude Harvest Wind from our CHWM calculation.

Peninsula entered the Harvest Wind Project in 2009. This was in response to forecasted A-RHWML need under the new Regional Dialogue Contract, as well as the new Washington State I-937 renewable energy requirement. Most of that Regional Dialogue forecasted load never materialized, which is why Harvest Wind is not used to serve Peninsula load today. Treating Harvest Wind as an existing, specified, dedicated resource post-2028 would translate to BPA penalizing Peninsula for its development, by decreasing the amount of Tier 1 energy Peninsula is eligible to receive. This would result in harmful, and we believe unintended, consequences.

We look forward to discussing this important proposal as part of the Provider of Choice conversations to achieve a mutually agreeable outcome.

Thank you,



**Sharon Silver**  
Power Resources Manager  
253-857-1526  
[sharons@penlight.org](mailto:sharons@penlight.org)

Cc: Post2028@bpa.gov  
Paul Munz  
Greg Huebner