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Submitted via email to post2028@bpa.gov

Mission Valley Power (MVP) is a utility operated and managed by the Confederated Salish and Kootenai Tribes in western Montana, exclusively serving the Flathead Indian Reservation. MVP is a non-profit utility and for all intents and purposes is a Tribal utility as the CSKT have managed the utility for over 30 years.

Our comments are related to address BPA's proposal related to Tier 1 system size adjustments for "load growth for existing Tribal utilities served by BPA".

The Tribes manage the utility under the terms of a **Self Determination Contract under a Public Law 93-638 opportunity** (25 U.S.C. 5301 et seq.) which enhances Tribal sovereignty and access to good paying jobs. We believe that Bonneville Power as a federal entity must recognize the federal law and the importance of all Tribal self-determination efforts in contributing to the reservation and nation building efforts.

BPA's trust responsibility to Tribes as defined by federal laws, treaties, executive orders and policies are not designed to *EXCLUDE* Mission Valley Power from the benefits other Tribal utilities have.

BPA's mission allows BPA to expand the Tier 1 rate eligibility to all Tribal utilities regardless of formation date. BPA's mission is to support Tribal self-determination efforts whether gained through a contract or compact operation of a utility.

The MVP utility faces the same other unique challenges faced by other Tribal utilities due to sovereign, legal and jurisdictional circumstances as well as having a checkboard landscape between Tribal and non-Tribal persons. We meet the definition of a Tribal utility within the definition of the BPA policy and BPA recognition of unique Tribal circumstances.

Seventeen per cent (17%) of the customers in Lake County, Montana lives in poverty.

MVP and the community we serve face the same social issues that other Tribal utilities face in their communities. There are unique legal challenges in every Tribal community as well as social challenges.

We urge Bonneville Power to expand its definition and access to power sold at Tier 1 rates for load growth experienced by **ALL Tribal Utilities**, regardless of whether they were formed before or after 2000.

Including Mission Valley Power with other Tribal utilities would align with BPA policy rationale (BPA definition) in recognizing unique reservation-based challenges.

Sincerely,

Teresa Wall McDonald, Utility Board Chairman
Mission Valley Power
Confederated Salish and Kootenai Tribes