

February 9, 2022

Submitted via web portal

Re: Resource Adequacy Engagement Workshop

Northwest Requirements Utilities (“NRU”) submits these comments in response to BPA’s January 27 Resource Adequacy Engagement workshop. NRU represents the interests of 56 Load-Following customers located in 7 states across the region that hold Network Transmission contracts with Bonneville Power Administration (“BPA”).

NRU appreciates the process that BPA has proposed to inform customers and respond to feedback, including tracking of customer comments and BPA’s response. We believe BPA’s proposed process will enable a transparent discussion and review.

NRU would like to reiterate its interests that will guide our engagement throughout the year on this issue. NRU has a strong interest in ensuring that BPA participates in the Western Resource Adequacy Program (“WRAP”) in a way that enhances regional reliability, provides measurable benefits to Load Following customers, and provides fair treatment in governance and cost allocation for Load Following customers. As BPA engages with customers throughout this year and considers whether to move forward into the Phase 3B binding stage of the WRAP program, we encourage discussions to (1) clearly identify areas of conflict with BPA existing adequacy procedures and the WRAP requirements; and (2) highlight mechanisms that BPA will establish in the new WRAP paradigm to preserve existing preference customer rights and support BPA legal obligations.

We look forward to continuing to work with you throughout this year to inform BPA’s decision whether to move into the Phase 3B binding stage of the WRAP.

Sincerely,

/s/ Tashiana Wangler

Tashiana Wangler
Rates and Policies Director