

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
BEFORE THE BONNEVILLE POWER ADMINISTRATION**

Proposed Safety-Net Cost)	
Recovery Adjustment Clause)	BPA Docket SN-03
(SN CRAC) Adjustment to)	
2002 Wholesale Power Rates)	

**MOTION TO COMPEL
THE BONNEVILLE POWER ADMINISTRATION
TO CONDUCT A SECTION 7(b)(2) RATE TEST**

Pursuant to the Rules of Procedure Governing BPA Rate Hearings, 51 Fed. Reg. 7611 (1986), and the Hearing Officer’s Order, SN-03-O-12, the Springfield Utility Board (“SUB”), the Canby Utility Board (“Canby”) and the Public Power Council (“PPC”) submit this Motion to Compel the Bonneville Power Administration to Conduct a 7(b)(2) Rate Test.

I. Background and Procedural History

On April 18, 2003, SUB filed its direct testimony in this proceeding. A portion of SUB’s testimony discussed BPA’s obligation to conduct a 7(b)(2) rate test. SN-03-E-SP-01, pages 7-11.

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On April 23, 2003, BPA filed a Motion to Strike a Portion of SUB’s Direct Testimony. SN-03-M-03 (“BPA Motion”).

On the same day, PacifiCorp, the Public Utility Commission of Oregon and Portland General Electric filed a similar motion. SN-03-M-01 (“Joint Motion”).

On April 29, 2003, SUB filed a Response to the BPA Motion, SN-03-M-12, and a response to the Joint Motion, SN-03-M-11. SUB requested that the Hearing Officer deny the BPA Motion and the Joint Motion.

On the same day, the Public Power Council (“PPC”) filed a Response In Support of SUB. SN-03-M-15. The PPC also requested that the Hearing Officer deny the BPA Motion and the Joint Motion.

On May 5, 2003, the Hearing Officer issued an Order Denying Motion to Strike a Portion of the Direct Testimony of the Springfield Utility Board, SN-03-O-12 (“The Order”).

The Order rejected arguments, put forth in the BPA Motion and the Joint Motion, that BPA had already decided the 7(b)(2) rate test issue in the prior WP-02 proceeding. The SN-CRAC is “not a self-executing mechanism; it requires analysis...”. Order at 4.

The Order also rejected BPA’s contention that the expedited, 40-day hearing in this proceeding automatically removed BPA’s obligations to conduct the test. “Given

the fact that 7(i) cases since 1985 which did not settle have each included a 7(b)(2) rate test, I cannot base a decision to exclude testimony in reliance upon the argument that the brevity of the 7(i) process itself is dispositive of BPA's intent to exclude the test from the SN CRAC proceeding." Order at 4.

Nonetheless, the Order said that the inclusion of SUB's testimony in the record did not imply that BPA was obligated to conduct a 7(b)(2) test. Rather, the Hearing Officer said he would consider separately -- and on its own merits -- a motion requesting BPA to conduct a limited 7(b)(2) test and to modify the schedule to provide sufficient time to prepare the study. Order at 5.

SUB, Canby and the PPC therefore file this motion to compel BPA to conduct the rate test.

II. BPA Has a Legal Obligation To Conduct The 7(b)(2) Rate Test In This Proceeding

SUB, Canby and the PPC believe the Northwest Power Act is clear. Whenever BPA conducts a rate case hearing under section 7(i) of the Act to establish rates for public bodies and cooperatives, BPA must also conduct a 7(b)(2) rate test.

BPA, however, has argued that it is required only to conduct a 7(b)(2) rate test on base rates (adopted in May 2000), not rates changed by Cost Recovery Adjustment Clauses ("CRACs"). BPA Motion at 3.

This argument should fail for the following reasons:

First, the statute makes no such distinction between base rates or rate adjustments, and BPA's own prior interpretations do not parse such a fine line.

Second, BPA itself agreed to conduct a section 7(i) rate hearing for the SN CRAC when it settled the Supplemental Power Rate Proposal in 2001. Having agreed to the section 7(i) rate case, BPA cannot now argue that it does not have to comply with the 7(b)(2) rate test.

III. The Mandates of Section 7

The rate test under section 7(b)(2) of the Northwest Power Act is one of the most important steps that BPA takes when it sets power rates. 16 U.S.C. § 839e(b)(2). The test is part of a complex list of requirements, generally called "rate directives," which BPA is obligated to follow when it sets rates. 16 U.S.C. § 839(e).

BPA first analyzed the 7(b)(2) rate directives in a 1984 analysis, the "Legal Interpretation of Section 7(b)(2) of the Pacific Northwest Electric Power Planning and Conservation Act," 49 Fed. Reg. 23,998. ("The Legal Interpretation").¹

Among other things, the Legal Interpretation concluded that BPA was charged

¹ The Legal Interpretation is contained as an exhibit to this Motion. SN-03-M-19A. It was originally included in SUB's Direct Testimony, SN-03-E-SP-01J.

with the responsibility of implementing section 7(b)(2) of the Northwest Power Act, and that BPA would follow basic principles of statutory construction in interpreting the Act. Legal Interpretation at 2. Those principles require that the particular provisions of a statute be interpreted to give effect to its overall purpose. Thus, BPA interprets the Northwest Power Act in a manner which seeks consistency among the requirements of *each* section of the Northwest Power Act. Id. at 2.

The Legal Interpretation said:

“Section 7 of the Northwest Power Act...[citation omitted] contains a number of directives that the BPA Administrator *must* consider in establishing rates for the sale of electric energy and capacity and for the transmission of non-Federal power. Section 7(b)(2), commonly referred to as the ‘rate test,’ is one of these directives.” Emphasis added. Page 3.

The Legal Interpretation also said:

“BPA will conscientiously follow the requirements of section 7(b)(2) to perform the ‘rate test’ for its public body, cooperative and Federal agency customers. If the results of the rate test indicate that BPA must recover costs in excess of those allowed under section 7(b)(2), BPA will implement the section 7(b)(3) supplemental rate charge for that purpose.” Page 9.

To this day, BPA itself routinely describes the section 7(b)(2) mandate as a “rate directive.” See, for example, the Administrator’s Record of Decision (“ROD”) for the Supplemental Wholesale Power Rate Proposal, WP-02-A-09 (June 2001) at 6-1.

And yet BPA's arguments here would undermine the very purpose of the rate directives. The directives would become discretionary requests to BPA that it could -- or could not obey -- depending on whether it classified the rate as a "base rate."

BPA's argument fails because of the statutory provisions in section 7(i), as well as the broad definition of a "rate" in the section 7(i) rules.²

SUB, Canby and the PPC believe the better reading of the statute and the rules is that they impose a number of procedural and substantive requirements on BPA -- obligations that BPA cannot selectively choose whether to follow or not.³

² The Act describes the obligations of the BPA Administrator to "establish, and periodically review and revise, rates for the sale and disposition of electric energy and capacity...". Section 7(a)(1), 16 U.S.C. § 839e(a)(1). No separate procedures or mandates are established in the Act for the adjustment of existing rates or the imposition of surcharges (as opposed to establishing "base rates"). If the Administrator establishes or revises rates, the directives of section 7 apply. BPA's own rules give support for this interpretation. The rules define a rate as "the monetary charge, discount, credit, *surcharge*, pricing formula, or pricing algorithm for any electric power or transmission service provided by BPA, including charges for capacity and energy." Emphasis added. Section 1010.2(j), Definitions. "Rules of Procedure Governing Rate Hearings," 51 Fed. Reg. 7611 (1986).

³ Section 7(a), for example, requires the Administrator to establish and adjust rates in accordance with sound business principles. 16 U.S.C. § 839e(a). Section 7(b) requires BPA to establish rates for public bodies and cooperatives. 16 U.S.C. § 839e(b). Section 7(c) creates a methodology for setting rates for the Direct Service Industries ("DSIs"). 16 U.S.C. § 839e(c).

If BPA proposes to adjust rates for public bodies and cooperatives pursuant to section 7(i), it needs to do a section 7(b)(2) rate test.

IV. The 7(b)(2) Rate Test

Section 7(b)(2) specifically directs BPA to conduct after July 1, 1985, a comparison of projected rates to be charged its public body, cooperative and Federal agency customers with the costs to those customers under hypothetical assumptions. 16 U.S.C. § 839e(b)(2).

If the rate test “triggers,” certain costs are then re-allocated in the rate case to other customers. Thus, the 7(b)(2) rate test imposes a “rate ceiling” on the rates charged to preference customers⁴ and Federal agency customers.

BPA has acknowledged the importance and impact of the rate test:

“The effect of this rate test is to protect BPA’s preference and Federal agency customers’ wholesale firm power rates from certain specified costs resulting from the provisions of the Northwest Power Act. The rate test can result in a reallocation of costs from the general requirements loads of preference and Federal agency customers to other BPA loads.” Administrator’s Record of Decision, 2002 Final Power Rate Proposal (May 2000), WP-02-A-02 at 13-1.

⁴ Preference customers refer to public bodies and cooperatives. Under the Bonneville Project Act of 1937, the Administrator “shall at all times, in disposing of electric energy, ...give preference and priority to public bodies and cooperatives.” 16 U.S.C. § 832c(a). The Northwest Power Act incorporates that section. “All power sales under this chapter shall be subject at all times to the preference and priority provisions of Bonneville Project Act of 1937 [citations omitted]...”. 16 U.S.C. § 839c(a).

BPA has also cited with approval language in Congressional reports that describe the significance of the 7(b)(2) rate ceiling:

“As an added protection against preference utilities and their customers suffering adverse economic consequences as a result of this legislation, section 7(b)(2) establishes a ‘rate ceiling’ which is hypothetically intended to insure that these customers’ rates will be no higher than they would have been had the Administrator not been required to participate in power sales or purchase transactions with non-preference customers under this legislation.”
Administrator’s Record of Decision, Final Power Rate Proposal (May 2000), WP-02-A-02 at 13-4, quoting from H.R. Rep. No. 976, Part II, 96th Cong. 2nd Sess. 35 (1980).

BPA, to be sure, has significant discretion in *how* it conducts the test: the simulations and technical decisions inherent in the process. But BPA has not -- and cannot -- cite a single statutory phrase that would allow it to avoid conducting the rate test when it proposes, pursuant to section 7(i), to revise rates for public bodies and cooperatives.

In sum, the two processes -- the section 7(i) rate case and the section 7(b)(2) rate test -- are inextricably linked. When it comes to establishing or adjusting rates for public bodies and cooperatives, BPA cannot do one without the other.

V. The SN CRAC

The Safety-Net Cost Recovery Adjustment Clause (“SN CRAC”) is an adjustment to power rates that BPA may impose only after it has conducted a section 7(i) hearing.

BPA's General Rate Schedule Provisions describe the purpose of the SN CRAC:

“The SN CRAC will be an *upward adjustment to posted power rates* subject to the FB CRAC by modifying the FB CRAC parameters. BPA will propose changes to the FB CRAC parameters that will, to the extent market and other risk factors allow, achieve a high probability that the remainder of Treasury payments during the FY 2002-2006 rate period will be made in full.”

Emphasis added. 2002 GRSPs, section F3, at WP-02-A-09 (June 2001), Appendix, page 25.

The SN CRAC represents a new approach on BPA's part. BPA began the WP-02 rate case, of which this proceeding is a part, in 1999. BPA issued a Record of Decision in May 2000. ROD for the Final Power Rate Proposal, WP-02-A-02. The ROD contained only one CRAC for financial reserves (the “FB CRAC”).

When wholesale power prices rose and BPA discovered that it was obligated to supply more load than anticipated, BPA published an Amended Power Rate Proposal on December 1, 2000. The proposal called for BPA to have the authority to impose an SN CRAC without a requirement for a section 7(i) hearing. 65 Fed. Reg. 75272 (2000).

At the time, BPA also proposed two other adjustment mechanisms: the Load-Based CRAC (“LB CRAC”) and the Financial-Based CRAC (“FB CRAC”). Both the LB and FB CRACs were based on specific formulas established in the rate case; they each had their own parameters and trigger points. Under those CRACs, BPA would make the necessary calculations and changes to rates *without* a separate section 7(i) hearing.

But BPA subsequently changed the procedural requirements for the SN CRAC. In a “Partial Stipulation and Settlement Agreement” (the “Settlement Agreement”) with customers, signed by BPA staff in February 2001, BPA agreed to hold a formal section 7(i) rate hearing before imposing the SN-CRAC.⁵

The Administrator then published a Supplemental Power Rate Proposal that reflected the terms and conditions of the Settlement Agreement. The Administrator adopted the Settlement Agreement in June 2001 when he signed the ROD for the Supplemental Power Rate Proposal. WP-02-A-09.

BPA, having agreed to those terms, including a section 7(i) hearing for the SN CRAC, cannot now argue that it need not comply with the other rate directives of section 7. When BPA agreed to conduct a section 7(i) hearing, it in effect agreed to conduct a 7(b)(2) rate test. The Hearing Officer should hold BPA to its agreement.

VI. BPA’s Interpretation of Its Obligations Is Inconsistent With Its Own Record of Decision Implementing the 7(b)(2) Rate Test (1984)

Despite BPA’s claims that it does not have a statutory obligation to conduct the 7(b)(2) test in this proceeding, BPA’s prior decisions strongly suggest that it is required to conduct the rate test whenever significant factors change.

⁵ SUB and Canby intervened in the proceeding but did not sign the Settlement Agreement. The PPC signed.

The critical document in describing BPA's procedures in conducting the rate test is the 1984 Record of Decision for the Section 7(b)(2) Implementation Methodology, b-2-84-F-02 ("Implementation ROD").⁶

The Implementation ROD analyzed, among other things, when BPA was obligated to conduct a new 7(b)(2) rate test and perform a new 7(b)(2) study. Among the factors: changes in BPA loads to reflect elasticity of demand. Implementation ROD at 22-23.

Similarly, the Implementation ROD specifically calls for BPA to adjust DSI loads in the rate test if the DSIs no longer exist or suspend BPA service. "If a DSI leaves the region or is no longer served by BPA, its loads will not be assumed to transfer from BPA service to utility service." Implementation ROD at 41.

Those conditions are precisely the ones that SUB raised in its Direct Testimony in this proceeding. SN-03-E-SP-01. SUB specifically cited conditions that changed since 2000, when BPA last conducted the 7(b)(2) rate test. SUB cited DSI loads, for example, which have shrunk from approximately 1,440 aMW to only 230 aMW in the SN CRAC projections. SN-03-E-SP-01 at 4 (Table 3). SUB also cited financial benefits to investor-owned utilities ("IOUs") that increased by approximately \$371 million over the rate period. SN-03-E-SP-01 at 6 (Table 4).

⁶ The Implementation ROD is an exhibit to this Motion. SN-03-M-19B. It was originally included in SUB's Direct Testimony, SN-03-E-SP-01K.

SUB, in other words, properly relied upon BPA's Implementation ROD in framing the arguments in its Direct Testimony.⁷ Until changed or amended, the ROD remains in force.

If BPA believes it has the right to restrict the use of the 7(b)(2) rate test, then it should go through the steps, pursuant to the Northwest Power Act, 16 U.S.C. § 839 et seq., and the Administrative Procedure Act, 5 U.S.C. § 551 et seq., to develop and publish a new implementation methodology.

Until it has done so, the Hearing Officer should not accept BPA's attempt to carve out ad hoc exceptions to its long-held practices.

VII. BPA's GRSPs Do Not Specifically Address the 7(b)(2) Rate Test

In its motion to strike a portion of SUB's testimony, BPA argued that its General Rate Schedule Provisions ("GRSPs") do not require BPA to conduct the 7(b)(2) rate test when implementing adjustment clauses (e.g., CRACs). BPA Motion at 2. BPA therefore concluded that it was not obligated to conduct the analysis.

But the GRSPs do not control. BPA cannot adopt a provision in a GRSP that contradicts the mandate of a statute. In case of conflict between a GRSP and the

⁷ In rebuttal testimony, BPA argues that it is impractical to conduct a section 7(b)(2) rate test whenever changes occur. SN-03-E-BPA-11 at 76. SUB, Canby and the PPC concur. That is why the 1984 Implementation ROD is so important. It describes the situations when BPA is obligated to rerun the 7(b)(2) rate test.

Northwest Power Act, the statute prevails.

There is nothing in the GRSPs that prohibits BPA from conducting the rate test. The GRSPs are silent on the matter. In those circumstances, the Hearing Officer must look to the statute and to BPA's historical practices, as contained in its Implementation ROD and other documents.

VIII. BPA, Not SUB or Another Party, Has the Statutory Responsibility To Implement the 7(b)(2) Rate Test and Conduct the Necessary Studies

In its Rebuttal Testimony, BPA also argues that SUB had the opportunity to conduct a section 7(b)(2) rate test study and present it as part of its direct case, "but chose not to do so." SN-03-E-BPA-11 at 78, lines 21-23.

But it is BPA, not SUB, which bears the responsibility for implementing section 7(b)(2) of the Act. The statute refers to the Administrator, not the customers, making the assumptions needed to compare proposed rates with the rates that would have occurred under the hypothetical conditions mandated by the statute. 16 U.S.C. § 839e(b)(2).

BPA's own 1984 Legal Interpretation cited three tasks it had recently completed to implement the Act. The first was the development of a legal interpretation. The second was "the development of a computer model to perform the rate test." Legal Interpretation at 4. The third task was the preparation and release of a rate test methodology (later called the Implementation ROD). The Implementation ROD itself repeatedly refers to

BPA's computer model and analytical skills.

In other words, BPA, not SUB or any other party in this proceeding, has the statutory obligation and the skills to do the necessary studies. SUB can offer criticisms, it can cross examine, it can suggest improvements.⁸ But it is not required to assume the mantle of BPA's statutory authority or responsibilities.

IX. BPA's Determination in the 2001 Supplemental Power Rate Case Does Not Resolve the Issue for the SN CRAC

In its Rebuttal Testimony in this proceeding, BPA argued that the Supplemental Power Rate Proposal, adopted in June 2001, established adjustment clauses ("CRACs") and did not include a 7(b)(2) rate test. SN-03-E-BPA-11 at 76, lines 23-26, and at 77, lines 1-3.

BPA thus offered the approach it adopted in 2001 as precedent to resolve the issue now before the Hearing Officer.

BPA's reliance on its decision in 2001 is misplaced. At issue in that rate case was BPA's obligation to analyze two rate adjustments -- the LB and FB CRAC -- both of

⁸ As a practical matter, SUB could not develop a 7(b)(2) rate test study on its own. The reason: SUB depends on BPA to provide many of the assumptions on which the study is based. The test, for example, requires BPA to analyze the "rate test period" (until 2006), plus the following four years. BPA, not SUB, holds the information for the post-2006 period. See, for instance, BPA's treatment of post-2006 in WP-02-FS-BPA-06 (May 2000) at Table 1.

which involved precise adjustments to base rates. The LB CRAC and FB CRAC formulas were contained in the General Rate Schedule Provisions. The parameters for the LB and FB CRACs were discussed in detail in the ROD for the 2001 Supplemental Power Rate Proposal.⁹

Nonetheless, various parties, including SUB and the DSIs, objected to BPA's failure to perform a section 7(b)(2) analysis.¹⁰

BPA's decision in that case is not a solid foundation on which to address the applicability of the 7(b)(2) test to the SN CRAC in this proceeding. In 2001, the SN CRAC was nothing more than a vague proposal in the GRSPs that allowed BPA to hold an open-ended rate proceeding at an unspecified, future date. No rate design

⁹ For the LB CRAC, see WP-02-A-09 (June 2001) at 4-6 through 4-18. The formula for calculating the LB CRAC is described in detail in the GRSPs, section F1 at WP-02-A-09, Appendix, pages 2-19. For the FB CRAC, see WP-02-A-09 (June 2001) at 4-19 through 4-21. The GRSPs describe the methodology used to adjust rates under the FB CRAC in section F2 at WP-02-A-09, Appendix, pages 19-20.

¹⁰ For a description of the arguments, see the ROD for the Supplemental Power Rate Proposal, WP-02-A-09 (June 2001) at 6-1 through 6-15. The rates from that proceeding are still before the Federal Energy Regulatory Commission ("FERC"). FERC's review is limited. It cannot redesign rates. The sufficiency of BPA's compliance with section 7(b)(2) is therefore not before FERC and must wait future determination by the U.S. Court of Appeals for the Ninth Circuit. Nothing in this Motion should be construed as waiving any arguments that SUB, Canby or the PPC might make regarding the Supplemental Power Rate Proposal or BPA's treatment of 7(b)(2) issues in that proceeding.

alternatives were offered. BPA did no modeling of the impact of potential SN CRAC adjustments on different power rates. ROD for the Supplemental Power Rate Proposal, WP-02-A-09 (June 2001) at 4-49. BPA simply deferred decisions about the design and scope of the rates until the day that it began a section 7(i) rate hearing.

Thus, when BPA initiated the SN CRAC proceeding in March 2003, the situation changed. BPA formally triggered the section 7(i) process and set in motion the statutory requirements to conduct the 7(b)(2) rate test.

X. The Hearing Officer Has a Statutory Obligation To Develop a Full and Complete Record

The Northwest Power Act requires the Hearing Officer to develop a “full and complete record” in a rate proceeding. 16 U.S.C. § 839e(i)(2). Based on the record, the Administrator then makes his or her decision, which includes a full and complete justification of the final rates. 16 U.S.C. § 839e(i)(5).

Courts have long held that the record must be complete if the decision in question can withstand judicial scrutiny. “If the record is not complete, then the requirement that the agency decision be supported by ‘the record’ becomes almost meaningless.” Portland Audubon Society v. Endangered Species Committee, 984 F.2d 1534,1548 (9th Cir. 1993).

SUB, Canby and the PPC therefore believe that the Hearing Officer is under a statutory obligation to *require* BPA to conduct the 7(b)(2) rate test and place the results

in the administrator's record for this proceeding. Omitting a key component of BPA's traditional ratesetting methodology will leave open to challenge the entire SN CRAC proceeding.

XI. Failure To Conduct the 7(b)(2) Test Deprives SUB, Canby and the PPC's Members of Their Statutory Rights

As preference customers and purchasers of BPA power, SUB, Canby and the members of the PPC have a statutory right to participate in this proceeding and to have BPA set rates in conformance with the Northwest Power Act. They have a right to request that BPA develop a full and complete record in this proceeding.

The Hearing Officer should not let BPA abandon its statutory and legal obligations simply for amorphous reasons of administrative convenience. Eighteen years of precedent demand that BPA run the 7(b)(2) rate test.

XII. The Deadlines in This Proceeding Can Be Extended

In its Rebuttal Testimony in this proceeding, BPA argues that the tight, 40-day deadline shows that BPA's intent all along was not to conduct the 7(b)(2) rate test.

"This intent is confirmed by specific language that precludes BPA, as a practical matter, from performing such a test." SN-03-E-BPA-11 at 75, lines 4-6.

BPA's position contains two faulty assumptions. First, the 40-day process did not prohibit BPA from starting to collect and analyze 7(b)(2) issues before the start of the rate case. BPA, for instance, could have modeled DSI loads under various conditions prior to publishing its Federal Register Notice.

Second, the General Rate Schedule Provisions ("GRSPs") for the SN CRAC expressly allow BPA and other parties to extend the schedule for this proceeding. "The hearing shall be completed within 40 days, unless a different duration is agreed to by the parties." See, 2002 GRSPs, section F3b, in WP-02-A-09, Appendix, at 26.

In sum, BPA had -- and still has -- a practical way of performing the 7(b)(2) rate test. It can seek a new deadline with its customers.

Finally, SUB, Canby and the PPC wish to note the potential ramifications of allowing an administrative agency to argue that it need not comply with its own statutory mandate or its own long-held practices simply because of time pressures. Following this line of reasoning, BPA could pick and choose whatever it wanted to follow in the Northwest Power Act on grounds that it was under time constraints. The provisions in the Act were placed there by Congress for a reason, and they have worked since 1980. The Hearing Officer should not to allow BPA to exempt itself from its obligations under law.

XIII. Relief Requested

SUB, Canby and the PPC respectfully request that the Hearing Officer grant this Motion to Compel and order BPA to conduct a section 7(b)(2) rate test as part of this proceeding.

SUB, Canby and the PPC also request that the Hearing Officer take appropriate steps to modify the schedule to allow BPA to conduct the 7(b)(2) rate test and incorporate the results in this proceeding.

DATED this 9th day of May, 2003.

Respectfully Submitted:

Peter Mersereau
/s/ Peter Mersereau
Attorney for Springfield Utility Board

Dan Seligman
/s/ Dan Seligman
Attorney for Canby Utility Board

Denise Peterson
/s/Denise Peterson
Attorney for the Public Power Council

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