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Kim Thompson  
Bonneville Power Administration  
Vice President  
Northwest Requirements Marketing

*Submitted via email*

Dear Kim:

Northwest Requirements Utilities (“NRU”) submits these comments to further inform the development of BPA’s post-2028 contracts and policies. As you know, NRU represents the interests of 56 Load-Following customers located in 7 states across the region that hold Network Transmission contracts with BPA. NRU’s members contract with BPA for almost 30% of BPA’s Tier 1 load. Of primary importance to NRU members is BPA’s ability to offer affordable and reliable power supply and transmission that maximizes the value of the Federal system for the benefit of preference customers.

We are writing in response to the May 19 workshop at which BPA reviewed its proposed principles and goals to guide the development of its post-2028 contracts and policies. NRU generally supports the goals and principles and sees alignment with goals and principles established by NRU’s Board of Directors. NRU additionally offers the following thoughts regarding BPA’s proposed goals and principles for your consideration.

First, there may be a tension between offering administratively straightforward contracts and offering customers products that will enable them to meet national and regional objectives. To the extent that administration of a particular program contemplated within the post-2028 contracts becomes a concern to BPA, NRU hopes to work through these areas with BPA as a partner to find an approach that provides customers with the power choices they need.

Second, NRU particularly appreciates BPA highlighting its goal to build on a long history of stewardship and regional relationships. For programs such as the low-density discount program and irrigation rate mitigation program and policies such as providing transfer service to systems without direct connections to BPA’s transmission, BPA has a long history of supporting rural communities through

these policies. In the post-2028 era more than ever utilities will rely on these programs to support their communities, and these are issues of particular interest to NRU.

Last, and of critical importance, NRU appreciates BPA's principle to ensure that Tier 1 firm power rates are set at the lowest possible rates consistent with sound business principles. As you know, in furtherance of this principle, NRU is very interested in analysis of the Tier 1 system size that will enable the lowest forecast reasonable Tier 1 rates over the duration of the contracts. NRU has supported the modification to stream flow planning in the current Rate Period High Water Mark planning process; however, prior to utilizing this approach within the post-2028 contracts, NRU would like to see additional rates analysis of different scenarios over the duration of the contracts, including possible augmentation, to determine which approach would provide the lowest forecast rates over time for preference customers while providing rate certainty and rate stability over time.

Again, we reiterate our appreciation of the proposed goals and principles and look forward to working with you throughout the post-2028 process to develop policies and contracts that are as beneficial as possible for NRU members and other preference customers.

Sincerely,

*/s/ Tashiana Wangler*

Tashiana Wangler  
Rates and Policies Director