

February 10th, 2023

John Hairston Administrator and CEO

Suzanne Cooper Senior Vice President of Power Services

Kim Thompson Vice President of Northwest Requirements Marketing

Submitted via email to <a href="mailto:post2028@bpa.gov">post2028@bpa.gov</a>

Dear Administrator Hairston, Ms. Cooper, and Ms. Thompson:

Klickitat PUD (KPUD) submits these comments to express support for the Northwest Requirements Utilities system size, allocation, and augmentation proposal (the "NRU Proposal"). The NRU Proposal as submitted provides benefit to all preference utilities and their respective customers.

KPUD feels that the region would benefit from a larger Tier 1 system size that will support the growing needs of the Pacific Northwest. The return of Grant PUD and Clark PUD will effectively decrease the available Tier 1 to other customers and we believe that this amount should be augmented in addition to the Columbia Generating Station EPU project. There have been many statements that there should not be any impacts to a significant section of public power that are not growing. We respectfully disagree and would suggest that the impacts of the return of these two utilities, in accordance with their contractual rights, should be borne by all customers, not just those who have invested in conservation or have existing ARHWM load to serve. The inclusion of an initial amount of augmentation in the NRU Proposal fits with this belief.

We also believe that future regional growth driven by carbon policies in the west suggest that cooperation between BPA and customers in developing policies that support the development and integration of non-federal resources at the utility level will be extremely important.

KPUD appreciates the results that the NRU Proposal achieves and urges Bonneville to incorporate it into its Provider of Choice policy as a basis for post-2028 power supply contracts.

Respectfully,

Mike DeMott Klickitat Public Utility District