



AWEC

Alliance of Western Energy Consumers ♦ 818 SW 3rd Avenue, #266 ♦ Portland, OR 97204 ♦ 971-544-7169 ♦ awec.solutions

October 4, 2024

Via Electronic Submission

Re: September 17th-18th Provider of Choice Workshop – Exhibit B

The Alliance of Western Energy Consumers (“AWEC”) has had the opportunity to review the comments submitted by Western Public Agencies Group (“WPAG”) related to the CF/CT Adjustment contract language in Exhibit B. AWEC supports WPAG’s proposal to revisit the CF/CT adjustment after CF/CT loads seeking to use this adjustment are known, as well as the concept that there should be flexibility regarding how the CF/CT adjustment and the Economic Adjustment interact. AWEC also shares WAPAG’s concerns that the current language where Bonneville determines eligibility for the CF/CT adjustment in one rate period, but the load is not eligible for Tier 1 service until the next rate period creates a rate cliff. CF/CT loads are typically associated with industries that adjust operations based on a variety of economic circumstances. If electricity prices are significantly higher for a long period before the CF/CT adjustment takes effect, we share WAPAG’s concern that this creates a real risk that the CF/CT load will be forced to respond by curtailing operations. Finally, AWEC shares WPAG’s concern that short-term reductions could lead to very long-term losses of the adjustment over the contract period. Additional parameters on this issue should also be discussed.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers