



Commissioners

Nancy E. Barnes
Jim Malinowski
Jane A. Van Dyke

*Chief Executive Officer/
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Wayne W. Nelson

September 5, 2018

Re: Comments of Clark Public Utilities on Scheduling, Control and Dispatch Alternatives

As a member of WPAG, Clark Public Utilities fully supports WPAG's comments to BPA regarding SCD rate design under consideration in BP-20. We also add these comments to WPAG's comments for BPA to consider.

Clark Public Utilities appreciates BPA's efforts to address areas needing change with regard to rate design. Unfortunately, we do not believe that SCD rate design is one of those areas. All of the alternatives negatively impact us. We can support changes to rate design that increase our costs when those changes are fair, considered, and show a benefit to a large number of BPA's customer base. That is not the case in this instance.

It appears to us that staying with the status quo rate design is the only logical alternative to address our concerns as well as those of a large portion of your customer base while adhering to BPA's set of six principles set at the start of this process.

Clark Public Utilities appreciates BPA's efforts to look for ways to treat its customers fairly, to encourage additional use of the system by those who have invested in the system, and to adhere to its set of rate principles. However, we don't believe any of the alternatives to the current SCD rate design as presented accomplish any of these.

We appreciate the opportunity to comment.