AWEC	- Strong interest from customers to hedge against market risk exposure with purchases from BPA, therefore offering a product with the right combination of price stability/certainty and term of service beyond a single rate-payer is highly desirable - Preserving the grandfathered Green Exception Option
NRU	- In favor of selling power at revised NR rate as its more stable with higher revenue stream than selling in a volatile wholesale market - Board expresses strong support for continuing to work on revised NR rate options, and much interest exists among NRU members Any new NR service must provide: - LF services, availability not limited only to forecasted firm surplus, and limits should be applied to quantity of power sold on a per-utility or per-NLSL bases - consistent with RD contract Exhibit H, environmental attributes of power sold should be allocated to the utility - Coordination with BPA Transmission to ensure timely response to interconnection requests of NLSLs
NWCPUD	- The Green Exception Option should be resurrected with new renewable resources in mind, such as solar PV, and the ability apply offsite projects interconnected with BPAT. Also the 9.9MW restriction creates a barrier for this product. - Support for BPA to redesign 7f rates to attract NLSL customers, keeping in mind reducing additional market risk or opportunity to minimize the 7f deficiency - There should be consideration for a capacity and energy based product that allows customers to access surplus federal capacity for variable resource integration - Using a PF based rate has merit over the current NR rate approach as the PF rate reflects embedded costs of the federal system capacity and energy
IOUs (Avista, PAC, PGE, Puget)	- Parties encourage BPA to explore further sales at a new specific 7f firm surplus rate, a new specific 7f NR rate and a negotiated or market 7f FPS rate - Emphasis should be placed on making power available under a 7f rate to all utilities in the region, which is consistent with statutory standard of encouraging “the most widespread use thereof at the lowest possible rates to consumers consistent with sound business principles . . . .” - An election by IOUs to not purchase power under existing NR Firm Power Block Power Sales Agreements should not preclude purchase of other power at 7f rate. If contract amendments are required, they should be fairly straightforward and not present a real obstacle to purchase power at a 7f rate. - BPA’s making low carbon power widely available under section 7(f) rates should facilitate BPA’s ability to market power and facilitate utility compliance with state carbon requirements. - Pursuit of 7(f) rates with stability or predictability for periods longer than the traditional two-year rate case cycle would be mutually beneficial for BPA and its customers

Whatcom	- Glad that BPA is taking a look at the possibility of serving NLSL loads at a rate that might competitive to non-federal power
Snohomish PUD	- Clarify the timing, availability and market risk the NR rate could potentially pose to BPA as a discretionary Tier 1 System obligation. As well as; • The process, binding commitment and qualifications required for a customer to secure service at the NR rate. • the basis or methodology for a re-design of a new NR Rate; and • The applicable terms and conditions associated with the service and rate. - Clarify how BPA would augment the Tier 1 system capability to provide energy at the NR rate - Interest to explore the conditions under which a new Firm Surplus rate would be applicable, as it's understood that services in contingent on availability and would not require augmentation. - Interest in understanding: • the process and qualifications required for a customer to secure service at the Firm Surplus rate • the basis or methodology for a re-design of a new Firm Surplus Rate; and • The applicable terms and conditions associated with this service and rate.
PPC	- The conceptual options presented by BPA staff could make it feasible for customers serving NLSLs to choose to take service at the NR rate, potentially allowing customer another option for NLSL service, and provide opportunities for BPA to maximize revenues from surplus sales. - To be successful, limitations and mechanisms to avoid risk shifting between rate classes would need to be addressed at the same time. - There is threshold interest among customers and enough potential value to merit further exploration.
WAPAG	- We support further exploration of new Section 7(f) rate concepts so long as they are available to all of BPA's preference customers, do not require planned augmentation, and are prudent from a financial and risk perspective that takes into account both the length and amount of the obligation
Tacoma	- Any new proposal to serve NLSL load of load following customers should be a win-win for all preference customers and not create any new material risks or cost shifts.
PNGC	- Concerned with the product concepts that may put BPA in a position of taking on additional firm obligations without the firm resources necessary to fulfill that obligation, which may obligate BPA to acquire resources to supply layering additional market risk. - How would BPA formulate or evaluate the "limited" amounts it would plan to sell under the new specific NR rate option? - Can BPA make firm surplus sales to existing NLSLs today who are taking non-federal resources, and if so, what are the primary differences between those potential sales and these new rate options?