

September 11, 2024

Submitted via e-mail to techforum@bpa.gov

RE: NRU Comments on proposed revenue financing amounts in BP-26 Transmission rates

Thank you for this opportunity to comment on the BP-26 Rates workshop held on August 27th. Northwest Requirements Utilities is a trade association comprised of 57 mostly small, mostly rural Load Following and NT customers that rely mostly or fully on Bonneville for their power supply and transmission service.

At the workshop, BPA staff shared several alternatives for determining the amount of revenue financing in BP-26 transmission rates. NRU supports using the 1% limiter alternative to establish BP-26 revenue financing amounts. It is NRU staff's understanding that this alternative would reduce the annual average amount of revenue financing included in the draft revenue requirement BPA shared on slide 75 of the workshop presentation by \$55 million.

Like BPA, expanding and enhancing the Transmission grid is a priority for NRU members. NRU supports the proposed capital spending levels BPA forecasts are necessary to meet the evolving needs and load growth of its customers. Due to this time of high forecasted growth and increased budget amounts for BPA Transmission Services, NRU supports a moderate revenue financing alternative to temper the likely double-digit BP-26 transmission rate increases. Otherwise, BPA should reduce the Agency Enterprise Services G&A budget amounts attributable to Transmission Services.

We appreciate the opportunity to comment on these draft inputs to the BP-26 rate case and we really appreciate the knowledge and thoughtfulness BPA staff bring to each of the rate case workshops. Finally, we want to thank Alex Lennox for his many years of federal service and support of Public Power. Alex has been the Power and Transmission revenue requirement study manager since he began at BPA 20 years ago. He has brought considerable expertise and humor to the rate case proceedings, and he will be missed. Thank you, Alex, and congratulations on your retirement!

Sincerely,

Emily Traetow
Rates and Policy Director
Northwest Requirements Utilities