



MEMORANDUM

EUGENE WATER & ELECTRIC BOARD
POWER RESOURCE DIVISION

Rely on us.

TO: Bonneville Power Administration
FROM: Eugene Water & Electric Board (EWEB)
DATE: September 5, 2018
SUBJECT: Comments regarding Schedule, System Control, and Dispatch (SCD) Rate Design

The Eugene Water & Electric Board (“EWEB”) appreciates the opportunity to submit comments on BPA’s consideration of alternative rate designs for its Scheduling, System Control and Dispatch (“SCD”) service.

EWEB would like to reiterate its support for the current SCD rate design. Further, EWEB would like to express its support for the comments submitted by both the Public Power Council (“PPC”), and Western Public Agencies Group (“WPAG”).

The White Paper recently released by BPA confirms that the current SCD rate methodology conforms with standard industry practice, and according to BPA’s own analysis, the “status quo” is the only alternative that meets all six of BPA’s rate principles.

Given BPA’s analysis, that BPA should maintain the status quo appears clear. Which is why, though appreciative of staff’s continued efforts to address customer concerns through the development of a white paper and matrix comparing the identified alternatives against BPA’s rate making principles, EWEB is forced to express no small amount confusion, and some frustration, as to why BPA staff is putting so much effort into a perceived issue the solution to which is so apparent.

For these reasons, as well as reasons previously stated, EWEB supports BPA’s continued use of the current SCD rate methodology and the immediate rejection of all other alternatives under consideration. Thank you for the opportunity to comment.