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January 9, 2013

RECEIVED BY BPA FOIA OFFICE THIS DATE: 1/17/13
DUE DATE: 2/15/13
LOG # BPA-2013-00400-F

Christina J. Munro, FOIA Officer
Mail Stop DK-7
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208

Re: FOIA Request; Low Density Discount awarded to Skamania
County PUD #1.

Dear Ms. Munro:

This request is sent pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. It seeks production of information related to the Bonneville Power Administration's ("BPA") Low Density Discount ("LDD") program and one of its LDD customers, Skamania County PUD #1 ("Skamania"), from 2000 to the present. Based on information we obtained from BPA's website, we understand that Skamania currently receives the LDD. This request is meant to include information related to Skamania's receipt of the LDD at any time from 2000 to 2012, inclusive. If Skamania did not begin receiving a LDD until some point after 2000, please consider this request to apply to all years during which it has received a LDD between 2000 and the present date, inclusive.

Please provide this office with all responsive documents and records regarding Skamania, in the following topic areas:

(1) For each Calendar Year ("CY") from 2000 to 2011, please produce the "Low Density Discount Data Requirements" form that was filled out by Skamania and submitted to BPA by June 30th of each year. We understand that this form is provided by BPA to its customers and is typically due by June 30th of each year. A redacted version of this form is attached to this request as Annex A.

(2) In the event that Skamania did not submit the Low Density Discount Data Requirements form provided by BPA, please provide the form(s) or document(s) that Skamania did submit each year for consideration of the Low Density Discount. Such forms or documents should contain substantially the same information as the Low Density Discount Data Requirements form provided by BPA. This includes, but is not limited to:

- (a) Total Retail Sales (kWh)
- (b) Total Retail Sales Revenue (\$)
- (c) Total Retail Load (kWh) for Calendar Year
- (d) Depreciated Electric Plant Investment
- (e) Consumers for Calendar Year
- (f) Miles of Distribution Lines
- (g) Miles of Service Drops, if any
- (h) Skamania's certification that the data submitted is true and correct

If BPA's data submission requirements between CY 2000 to 2011 have varied from the types of documents listed above (which we understand to be the current requirements), please provide us with whatever data Skamania submitted for each CY from 2000 to 2011 to enable BPA's determination of Skamania's LDD under the then-applicable guidelines.

(3) For each year from 2001 to 2012, please produce the document(s) which states BPA's award of the Low Density Discount to Skamania beginning in that year. This document or documents should specify the applicable discount percentage and annual dollar benefit awarded to Skamania, as well as the date of the award and effective date of discount. We understand that this document is typically in the form of an award letter and that discounts typically begin on October 1st of each year.

Please note that we are not requesting all of BPA's internal calculations, correspondence, or other documentation of BPA's LDD adjustments based on certain types of loads and ineligible charges. Such information is not intended to be within the scope of this FOIA request. However, we are requesting BPA's customary form of notice to or communication with LDD recipients that informs Skamania of BPA's award of the LDD discount for each year from 2001 to 2012.

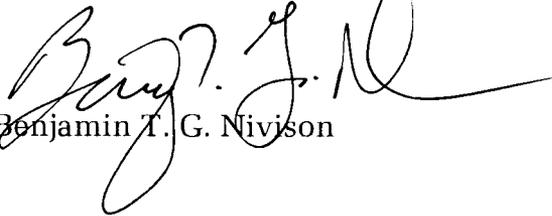
Thank you for your assistance with this request. We are willing and able to pay any applicable fees associated with the retrieval and production of this information. We are not requesting a fee waiver at this time, although we are acting in the public interest in obtaining this information. If, however, the costs associated with this request are going to be greater than five hundred dollars (\$500.00), please contact me to discuss whether this request could be modified to manage those costs.

If I can provide any further information regarding the scope of this FOIA request, or the nature of the information requested, please let me know. We look forward to receiving BPA's response to this request at the soonest possible date.

Ms. Christina Munro
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Sincerely,

HELSELL FETTERMAN LLP



Benjamin T. G. Nivison

BTN:aeg

ANNEX A

County PUD No. 1
LOW DENSITY DISCOUNT DATA REQUIREMENTS
Effective starting with October 2012 Billing Period

Please provide the following information for Calendar Year 2011. If the data and supporting documentation are not received by June 30, 2012, County PUD No. 1 will be ineligible for the LDD beginning October 1, 2012. Definitions are provided on the next page.

- 1. Total Retail Sales (kWh): [redacted] kWh
 - 2. Total Retail Sales Revenue (\$): \$ [redacted]
 - 3. Total Retail Load (kWh) for Calendar Year 2011 (as defined in BPA's 2012 General Rate Schedule Provisions): [redacted] kWh
 - 4. Depreciated Electric Plant Investment (excluding generation plant) as of December 31, 2011: \$ [redacted]
 - 5. Consumers for Calendar Year ending December 31, 2011:
 - Number of Consumers as of December 31, 2011: [redacted]
 - Less number of Separately Billed Services¹ (water heating and security lighting; if **and only** if included in line immediately above)²: [redacted]
 - Adjusted Number of Consumers: [redacted]
 - 6. Miles of Distribution Lines³ as of December 31, 2011: [redacted]
 - Miles of Service Drops (SD), if any, included above: [redacted]
 - 7. Attached Supporting Documents for Calendar Year 2011, required for eligibility:
 - A. Annual Financial and Operation Reports
 - o Rural Utility Services (RUS) Form 7, or
 - o Cooperative Finance Corporation form analogous to RUS Form 7, or
 - o Audited Financial Report; **and**
 - B. Annual 861 report to the Energy Information Administration.
- [redacted] County PUD No. 1 has already provided BPA with the above required forms.
- [redacted] County PUD No. 1 has enclosed the above required forms.

I hereby certify that the above information and all data are correct, and loads gained by Retail Access or loads outside the region are excluded in the data above. I further certify [redacted] County PUD No. 1 agrees to pass LDD benefits through to its eligible consumers within the region served by BPA.

Name: [redacted] Title: [redacted] Date: [redacted]

¹ BPA may request additional documentation for any claimed separately billed services.

² For Customers providing Financial and Statistical Reporting to RUS via Form 7, use Part O, Power Requirements Data Base, Line 10 (December). For Customers providing Financial and Statistical Reporting to CFC via Form 7, use Part R, Power Requirements Data Base, Line 10 (December)

³ Distribution lines are those lines that deliver electric energy from a substation or metering point, at a voltage of 34.5 kV or less, to the point of attachment to the consumer's wiring and include primary, secondary and service facilities. (Service drops are considered service facilities).