



August 10, 2022

Mr. John Hairston, Administrator  
Bonneville Power Administration  
PO Box 3621  
Portland OR 97208-3621

*Via email to [post2028@bpa.gov](mailto:post2028@bpa.gov)*

Re: Provider of Choice Concept Paper

Dear Administrator Hairston:

Thank you for the opportunity to provide comments on BPA's Provider of Choice Concept Paper. Northern Lights, Inc. (NLI) is an electric cooperative serving 22,000 members in Bonner, Boundary and Kootenai counties in Idaho, and Lincoln and Sanders counties in Montana. NLI is a member of PNGC Power and supports PNGC's comments.

We urge BPA to provide all customers with Contract High Water Marks (CHWMs) sufficient to cover their net requirements load, at a minimum, for both energy and capacity. We support BPA augmenting the size of the Federal Base System (FBS) to do so, if necessary, including augmentation to provide an equitable amount of headroom for all customers as is currently under discussion by public power. We also support BPA's proposal to fix the Tier 1 system size for the duration of the Post-2028 contract.

We urge BPA to provide Tier 2 power at a cost-based rate, not an opportunity cost-based rate, whether such power is sourced from the FBS or some other resource. We support BPA's proposal to add self-funded conservation savings to CHWMs based on current and future conservation efforts rather than past accomplishments.

We support BPA's proposal to continue to roll-in costs for Transfer Service but urge BPA to provide comparable (e.g. non-pancaked) transmission service to Transfer customers for deliveries of federal and non-federal power alike.

Thank you again for the opportunity to provide these comments and we look forward to working with BPA to develop mutually beneficial contracts that will serve Northwest public power well for many years to come.

Sincerely,

Annie Terracciano, GM