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February 9, 2023

John Hairston
Administrator and CEO

Suzanne Cooper
Senior Vice President
of Power Services

Kim Thompson
Vice President of Northwest
Requirements Marketing

Submitted via email to post2028@bpa.gov

Dear Administrator Hairston, Ms. Cooper, and Ms. Thompson:

Hood River Electric & Internet Co-op (HR Co-op) submits these comments to express support for the Public Power Council's Framework and Considerations, and for Northwest Requirements Utilities (NRU) system size, allocation, and augmentation proposal (the "NRU Proposal"), which NRU submitted to the Bonneville Power Administration on February 8, 2023.

The PPC Framework, which was presented to BPA on February 2, 2023, was the culmination of intensive efforts by the entire public power community. The PPC Executive Sponsor Community included a broad cross section of differently situated utilities; the participants should be commended for their tireless work to find solutions to some difficult problems. At a minimum, BPA should ensure its approach fits within this framework.

Further, we encourage BPA to consider the NRU Proposal as a valuable and beneficial approach. The NRU Proposal is consistent with the PPC framework, and it provides more specific guidance on several issues that will be critical to public power in the post-2028 era.

The NRU Proposal would provide benefits to all preference utilities, whether those utilities are experiencing load growth, have lost loads, maintain relatively flat loads, or have invested significantly in conservation during the Regional Dialogue contract. Further, current modeling shows that all preference customers would be better off under the NRU Proposal than under any of the other models under consideration in the region. We encourage all preference customers and BPA to review this final version of the proposal closely. NRU staff worked closely with differently situated utilities to understand their concerns and priorities and continued to refine the model to incorporate changes to try to create the best outcome for all of public power. We believe the final version of the model represents the best choice of all the options under consideration.

This NRU Proposal represents a careful compromise between its members, incorporates inputs from other utilities, and strikes an intentional, equitable balance of benefits for all of Bonneville's preference customers. Although my utility would prefer and benefit from a larger Tier 1 system size, we recognize that such deviations could negatively affect other preference customers and upset the balance that the NRU Proposal strikes.

For these reasons, HR Co-op appreciates the delicate balance that the NRU Proposal achieves and urges Bonneville to incorporate it into its Provider of Choice policy as a basis for post-2028 power supply contracts that we will sign.

We appreciate the work done by BPA, NRU, PPC, and public power to try to find a solution that will help us continue to deliver the benefits of the federal system to our rural communities. The work we have done is a great demonstration of how we are more powerful when we work together.

In Cooperation,



Libby Calnon,
General Manager
Hood River Electric & Internet Co-op