

From: Ken Dizes
Sent: Saturday, May 13, 2023 7:59 AM
To: Post-2028
Subject: Additional Comments

To Whom it May Concern:

Salmon River Electric Cooperative has provided comments in the past relating to the Post 2028 BPA contract policy. The BPA process has been iterative, which is expected. I thought it useful to summarize SREC's view on policy issues at this time. Bulleted below are our comments.

Thank you for the opportunity to comment,
Ken Dizes
General Manager
Salmon River Electric Cooperative

SREC continues to support BPA having a provision that allows loads that are "Contracted for and Committed to" be included in the CHWM calculation. We have no problem BPA specifying some year that this load must materialize (2033 is a good year) or the load will not be included in the CHWM calculation. SREC serves a major industrial customer (Thompson Creek Mine) and has served load on this property for over forty years. SREC has been in discussions with TCM about a ramp up to full load within the next 3-5 years. TCM and SREC are making commitments based on our ability to continue taking Tier 1 power from BPA to serve this load.

SREC continues to support the NRU proposal which includes a system size of 7500 MW. Some have asked why SREC would favor such a proposal since growth is relatively flat at our utility. The simple answer is SREC values BPA. BPA provides cost effective and reliable electric power to SREC even if we will have to pay slightly higher rates in the Post 2028 contract under a larger BPA as proposed by NRU. SREC is coalescing around a position supported by many customers of BPA even if it causes us to pay higher rates than we would under a smaller BPA.

SREC continues to support BPA providing transfer services like they do today under Regional Dialogue Contracts. This includes BPA providing transfer service for both federal and non-federal power delivery. SREC believes we should be treated as close as possible to direct connect customers of BPA when it comes to transmission service. It was difficult but doable to get transmission built to southeast Idaho back when the decision was made to not build transmission lines to serve these BPA customers. SREC recognizes BPA saved billions of dollars by utilizing transfer service verses direct build to these customers. Now it is virtually impossible to build transmission to these customers because of permitting issues. It appears not to be as cost effective to site new generation resources and transmission lines to serve these customers as well. It is wrong for BPA to abandon its transfer customer now by considering policies that provide discriminatory treatment of its customers that rely on transfer service as proposed in BPA's initial policy position.

SREC continues to support renewables that were invested in or that are required to be purchased under PURPA by BPA customers not have their CHWM or its proxy reduced by these resources. It makes no sense to do this and makes as much sense as increasing CHWM for energy conservation.

SREC believes the Above- HWML small utility exemption of 5 MW is too low. SREC is a small

utility. SREC would like to see that exemption be at least 10-20 MW.

SREC supports BPA not putting the tracking or selling RECs on its customers. BPA is better situated to do this especially for small utilities.

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