

April 29, 2022

PPC Comments on Long-Term Hydro Generation Forecast

The Public Power Council (PPC) appreciates this opportunity to comment on BPA's proposed modifications to its hydro generation forecast and definition of firm critical system output.

As a general matter, PPC appreciates BPA's efforts to incorporate climate change impacts into planning and rate setting over time. The proposed methodology has several promising elements in terms of better reflecting climate change trends and aligning BPA's planning and rate setting processes. The information and analysis that BPA has provided to date has been very helpful in advancing our understanding of the proposed changes. At the same time, there are still some outstanding areas of customer questions and concern. We believe that additional time to more thoroughly analyze risk implications and individual customer impacts would be particularly helpful.

PPC recommends that BPA advance the "most recent 30 water year" construct into the RHWM process but leave flexibility on the final definition of firm critical output for BP-24. Specifically, we propose that additional analysis be conducted around risk implications of the monthly "P10" value and also a monthly percentile that would match the amount of annual generation under the current 1937 definition. PPC believes that this type of analysis can provide valuable information that is not currently available and build towards greater customer consensus while also not creating undue workload or negatively impacting the RHWM process.

Thank you for your consideration of these comments. We look forward to working with BPA staff as this issue develops further.

Sincerely,



Michael Deen

Policy Director, Public Power Council