

Submitted Electronically

March 7, 2022

John Hairston
Administrator, Bonneville Power Administration
Portland, OR 97232

RE: Southeast Idaho Loads and B2H Transfer Service Proposal

Dear Administrator Hairston,

The Public Power Council (PPC) appreciates the opportunity to comment on BPA's planned approach for serving its preference customers in Southeast Idaho, including the draft term sheet developed by BPA, Idaho Power, and PacifiCorp. We would like to acknowledge BPA staff's efforts to explore creative solutions to improve service for its Southeast Idaho customers while reducing costs for all power customers through lower transfer costs. While we appreciate the hard work to operate within BPA's current limitations, we encourage BPA to continue to identify and address barriers that prevent the agency from providing direct transmission service to its customers. PPC looks forward to further discussion on those issues more broadly in the future.

Regarding BPA's new proposed approach to meeting its load service obligation in Southeast Idaho, PPC observes multiple benefits in this proposal compared to the status quo. First, PPC supports a solution that facilitates the construction of the Boardman to Hemmingway project. Construction of this project should improve service to BPA's customers and improve trade opportunities across the region. Second, we appreciate BPA's effort to develop an alternative that will improve and streamline transfer service. The proposed agreement should provide more reliable service at lower costs compared to the status quo. The agency's efforts to reduce the costs of transfer service, which are borne by all power customers, are important and we acknowledge the progress on those efforts in this proposal.

Based on these benefits, PPC supports BPA's proposed alternative as an improvement over the status quo. As BPA works to implement this planned approach, it must ensure that it improves the outcome for all of its preference customers as intended. To that end, the agency should commit that this planned approach will not negatively impact the current or planned load service to its preference customers.

Thank you for the opportunity to comment and again we commend BPA staff for their work on this issue.

Sincerely,



Scott Simms
Executive Director, Public Power Council