Public Power Council



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CRT Review (DKE) P.O. Box 14428 Portland, OR 97293 Transmitted Electronically: treatyreview@bpa.gov

U.S. Entity, Columbia River Treaty:

Mr. William Drummond, Administrator Bonneville Power Administration

Brigadier General Anthony Funkhouser, Commander U.S. Army Corps of Engineers, Northwestern Division

Dear Sirs,

I am writing on behalf of the Public Power Council (PPC). As you know, we have a great interest in your recommendation regarding the Columbia River Treaty scheduled for later this year. PPC's members are consumer-owned utilities in the Pacific Northwest that purchase power and transmission services from the Bonneville Power Administration (BPA). As key players helping to create jobs in local communities, these utilities have a strong interest in the level of BPA's rates, and in the amount, timing, and use of power generated by the Federal Columbia River Power System. In addition to the core issues of this Treaty involving flood control and power production, we have a serious interest in all aspects of river management and a proven commitment to environmental stewardship.

Since our last opportunity to comment officially back in February, we have become very concerned about the process regarding the development of the recommendation to the U.S. State Department by the U.S. Entity. First, we want to be clear that we strongly support the fact that the U.S. Entity is made up of the Bonneville Power Administration and the U.S. Army Corps of Engineers. These two agencies have expertly implemented the Treaty for a long time, and should continue together in that leadership role. Also, we understand the desire to hear from other interested parties within the federal, state, and tribal governments. However, keeping any part of this process closed and limited only to members of the "Sovereign Review Team" is unacceptable and not conducive to creating broader regional buy-in to recommendations involving issues that pose potentially large costs to ratepayers and real concerns regarding flood control to businesses and citizens along the river.

It is the job of the U.S. Entity to craft the Draft Recommendation. We understand that the intent is to receive further comment over the summer before presenting another draft in September. Therefore, the current version should be released *immediately* for review by all interested parties in the region. Feedback by those who, in the end, bear the cost of the Treaty's power provisions must be a critical part of your

review process. The Treaty studies to date have only enhanced our concern about the great inequity to electricity ratepayers in the United States of the current Treaty arrangement.

As citizens of the Northwest, we appreciate the many benefits of the Columbia River System such as clean hydropower, irrigation, navigation, recreation, and the ability to avoid harmful flooding that can endanger lives. The Treaty and other water management agreements have worked well to make this possible, and have worked in conjunction with other extensive programs for fish and wildlife enhancement.

We continue to believe a regional approach with broad agreement on a direction regarding this Treaty should be possible. But, full and immediate engagement between the U.S. Entity and PPC members and others with utility and operational experience is critical to achieving the best results for the citizens and the economy of this region. We look forward to your response and to working with you on this important set of issues.

Sincerely,

Scott Corwin

Executive Director