April 20, 2020
Joel Cook Senior Vice President Power Services
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

RE: PPC and NRU Comments on BPA's Resource Program

Dear Mr. Cook:

We would like to take this opportunity to comment on the Bonneville Power Administration's (BPA) 2020 Resource Program (RP). The Public Power Council (PPC) and Northwest Requirements Utilities (NRU) members purchase the vast majority of BPA's firm power and represent the full diversity of Northwest public power utilities. PPC and NRU also strongly advocated for and supported the 2018 revamp of the Resource program process.

The 2020 RP provides valuable analysis of BPA's obligations, needs, and resource options. BPA staff have developed robust modeling and analysis to support the 2020 Resource Program and we believe the end result gives prudent guidance for BPA's future resource acquisitions.

PPC and NRU support continued investment in the RP, as it is a valuable use of staff time and agency resources. The insights from the RP help to effectively direct funding for resources such as conservation and to understand the risks and opportunities associated with various options to meet the resource needs associated with BPA's power sales obligations.

The Northwest Power Planning Council (NWPCC) Power Plans are regional documents and provide useful information, but the Administrator is ultimately responsible for making resource decisions and determining consistency with NWPCC recommendations. To this end, the RP and the underlying analytical capability used to produce it are important tools for the Administrator to weigh the risks and benefits of different resource acquisition approaches.

Ultimately, an effective RP should lead to a more accurate and effective resource strategy that creates value for BPA and its customers. This requires not just a good plan, but consistent and effective use of the information. We look forward to working collaboratively with BPA to most effectively use the output from this RP analysis and to further enhance the process in future iterations.

Thank you for your consideration of these comments.