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John Hairston  
Administrator and CEO

Suzanne Cooper  
Senior Vice President of Power Services

Kim Thompson  
Vice President of Northwest Requirements Marketing

Submitted via email to [post2028@bpa.gov](mailto:post2028@bpa.gov)

Dear Administrator Hairston, Ms. Cooper, and Ms. Thompson:

Salmon River Electric Cooperative (SREC) submits these comments to express support for the Northwest Requirements Utilities system size, allocation, and augmentation proposal (the "NRU Proposal"), which NRU submitted to the Bonneville Power Administration on February 8, 2023. The NRU Proposal is consistent with the Public Power Council's (PPC's) Framework and Considerations, which PPC presented to Administrator Hairston and other officials from the agency on February 2, 2023, but the NRU Proposal provides more specific [guidance](#) on several issues that will be critical to public power in the post-2028 era.

The NRU Proposal would provide benefits to all preference utilities, whether those utilities are experiencing load growth, have lost loads, maintain relatively flat loads, or have invested significantly in conservation during the Regional Dialogue contract. Further, current modeling shows that all preference customers would be better off under the NRU Proposal than under any of the other models under consideration in the region.

**SREC has had a very large load (two-thirds of our total load) that is served under the Regional Dialogue Contract reduce load and reduce employment by 400 employees. This has had a huge negative financial impact on our already struggling rural economy. This load may likely return, but maybe not in 2023 or 2024. The NRU proposal recognizes that there could be other similarly situated utilities that have had a large single load reduce load for a time during the Regional Dialogue Contract but have plans to return in a reasonable period of time that may bridge across the Regional Dialogue and Provider of Choice Contracts, and should be allowed to be served at Tier 1 rates.**

**Another item the NRU proposal addresses is that of recognizing investments BPA customers have made in renewable resources or local power purchases of renewables made under the RD Contracts. It makes sense that if credit is going to be given for self-funded energy conservation, then credit for renewable investments or renewable power purchased to serve Tier 1 loads should be given in any CHWM allocation methodology.**

For these reasons, Salmon River Electric Cooperative appreciates the delicate balance that the NRU Proposal achieves and urges Bonneville to incorporate it into its Provider of Choice policy as a basis for post-2028 power supply contracts that SREC will sign.

Sincerely,  
Ken Dizes