

March 29, 2024

Submitted via email to techforum@bpa.gov

Northwest Requirements Utilities (NRU) submits these comments in response to BPA's March 19, 2024, BP/TC-26 Rate Case Pre-Proceeding Kickoff Workshop. NRU represents the interests of 57 Load-Following customers located in 7 states across the region that hold Network Transmission contracts with BPA and contract for roughly 30% of BPA's Tier 1 load.

NRU continues to support BPA's six step approach to customer engagement and believes it has served both BPA and its stakeholders well in past processes. Regarding the proposed Principles, of primary importance to NRU members is BPA's ability to offer an affordable and reliable power supply that maximizes the value of the Federal system for the benefit of preference customers. Given the available information, BPA's proposed BP-26 Principles appear to be aligned with that end goal. Additionally, NRU appreciates that the proposed TC-26 Principles highlight the fact that BPA will consider differences from the FERC *pro forma* tariff if the difference is necessary to prevent significant harm or provide significant benefit to BPA's mission or the region, including BPA's customers and stakeholders. As BPA and its customers continue to work through the queue reform process that began with TC-25 and given the necessity of long-term firm NT access to NRU members, BPA's willingness to deviate from the *pro forma* tariff may be essential as we move toward day-ahead market integration and Provider of Choice contract implementation.

NRU is supportive of the Power Rates Topics that BPA proposed and asks that Tier 2 Pricing and Demand Pricing be added to the list, with time set aside for discussion and consideration. Further, we look forward to engaging with BPA on the BP-26 Utility Delivery Charge (UDC) as part of the Segmentation conversation.

We continue to appreciate the public process and open dialogue provided by BPA and appreciate the opportunity to provide these comments. Thank you for your time and attention.

Sincerely,

Matthew A. Schroettig
Vice President, Policy & Legal Affairs
Northwest Requirements Utilities