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Sent: Monday, March 3, 2025 5:10 PM

To: Finance <finance@bpa.gov>

Subject: New Information Impacting BP-26 IRP Cost Projections

Pursuant to the BP-26 Federal Register Notice (FRN), I have been authorized by Avangrid Renewables to send this email to urge Bonneville to consider new information and changed circumstances arising after the date of the FRN (November 13, 2024) that affect BPA's cost projections.

Specifically, the significant workforce reductions at BPA (roughly 20% of the agency under the initial wave) and corresponding federal hiring freeze, both of which are the direct result of actions taken by the new administration beginning on or around January 20, 2025. Additional reductions were announced last week in a memo dated February 26, 2025.

While Avangrid is hopeful that Bonneville may ultimately be excluded from additional reductions and/or could even reverse more of the current workforce reductions (e.g., news reports indicate that 30 employees terminated were later deemed critical and their terminations were rescinded), it is untenable that the agency might go forward with unprecedented transmission rate increases premised on what appear to be unattainable workforce aspirations.

As you know, the expense and capital cost forecasts included in the BP-26 Integrated Program Review began on June 25, 2024 and concluded on October 24, 2024. The opportunity to review and comment on these forecasts did not permit stakeholders the opportunity to understand the amounts associated with the additional hiring and personnel costs needed to support significant transmission expansion efforts that may now be delayed. The deadline to file data requests on BPA's initial proposal was on December 17, 2024, well before the workforce reductions and hiring freeze were announced.

It seems axiomatic that a targeted IPR update is warranted to address how the expense and capital costs included in BPA's Initial Proposal have been impacted by Bonneville's unprecedented workforce reductions and hiring freeze.

Please let me know if you have any questions.

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