



Google LLC  
4200 Columbia Rd  
The Dalles, OR 97058

April 26, 2023

***Via Electronic Submission***

**Re: BPA Provider of Choice Concepts**

Google appreciates the opportunity to file initial comments on Bonneville Power Administration's ("BPA") Provider of Choice Concepts. Google is a large commercial customer of Northern Wasco County People's Utility District ("NWCPUD") in The Dalles, Oregon.

Google was an early pioneer of clean energy investment and has invested in over 7 GWs of clean energy around the globe. From 2010 to 2021, we've committed approximately \$6 billion to purchase clean energy from wind and solar projects globally through 2040. In doing so, Google has learned a tremendous amount about the opportunities and barriers to the deployment and integration of clean energy and now, more than ever, recognizes the economic development opportunity of clean energy deployment. Google has set a goal to operate all of our facilities on 100% clean energy, every hour of every day, an objective we call 24/7 CFE. Given this objective, access to carbon-free energy directly impacts Google's ability to grow in a given location.

Google understands that development of carbon-free energy options on BPA's system is a complex issue that will take additional discussion and time beyond what is available prior to issuance of the Draft Provider of Choice Policy in late July. We further understand and appreciate BPA's commitment to frame carbon among the Agency's strategic priorities, and its recognition of, and support in, helping its customers and their end-use consumers, like Google, to meet regulatory requirements and individual commitments. However, time is of the essence.

Google urges BPA to commit to formal discussions with its customers and other stakeholders as soon as practicable to begin identifying and refining product offerings that could allow all or a subset of BPA's customers the ability to obtain 100% carbon-free energy resources. Timely, proactive engagement with stakeholders is necessary to enable sufficient processes to thoughtfully develop solutions to these complex challenges.

Google looks forward to continued engagement through the appropriate channels to further this conversation.