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Submitted via email to post2028@bpa.gov

Northwest Irrigation Utilities (“NIU”) submits these comments to address BPA’s proposal related to the Irrigation Rate Discount program in the Provider of Choice contracts. NIU membership consists of 18 utilities across 6 western states and receives approximately 50 percent of the total discount program dollars to support their customers.

A primary reason for the development of the federal dams was to provide and extend irrigation services throughout the region. As a recognition of the importance of irrigation to the region, BPA has provided a discounted power rate for irrigation loads since the early 1940s. The discount provides a much-needed boost to the agricultural sector and the broader rural economy that is dependent on agriculture, helping to mitigate the higher costs of serving rural areas versus urban areas and smoothing out cost swings associated with large increases in irrigated power costs during a limited period in the summer months. The discount has a broad impact on rural economies and communities, supporting quality agricultural production, biofuel development, and carbon sequestration opportunities.

BPA’s proposed approach to the Irrigation Rate Discount program for the Provider of Choice contracts appears reasonable. While updating eligible irrigation loads based on average May through August irrigation load in 2018-2022, rather than rolling over eligible irrigation loads identified in the Regional Dialogue contracts based on irrigation load in 2002-2004, will have the effect of increasing the discount for some utilities and decreasing the discount for others, it appears the change for any particular utility will be manageable.

Thank you for considering these comments.

Sincerely,

/s/ Tashiana Wangler

Tashiana Wangler
Rates and Policies Director