



via email (techforum@bpa.gov)

Kim Thompson
Vice President for NW Requirements Marketing
Bonneville Power Administration

May 12, 2023

Re: Decision to Cancel May 24 Provider of Choice Public Workshop

Renewable Northwest (“RNW”) respectfully submits these comments to the Bonneville Power Administration (“Bonneville”) concerning the agency’s decision to cancel the May 24, 2023 Provider of Choice Public Workshop (“May Workshop”), as described in the May 4, 2023 Tech Forum Notice and accompanying letter. At a bare minimum, Bonneville should hold the May Workshop to identify each of the issues, briefly describe the alternatives the agency is still considering, and hold a final informal comment period before releasing the draft Record of Decision (“ROD”) in late July.

Bonneville initially intended to provide an executive-style overview at the May Workshop before releasing its draft ROD, but has since determined its staff time would be better spent developing a more robust policy. Bonneville now intends to present the draft policy ROD on July 26, 2023, hold one additional meeting a few days later (on August 1, 2023) to clarify and/or answer questions, and then conclude a formal review and comment period on October 13, 2023.

Bonneville’s decision to effectively end the informal workshops early seems out of step with the collaborative spirit of the workshops to date. Even if Bonneville staff does not yet have a comprehensive policy leaning to share, the May Workshop could provide value to stakeholders and Bonneville staff alike by at least confirming which topics and/or alternatives are still being considered by the agency. If there are any leanings from agency staff, it would be helpful for stakeholders to hear them now rather than waiting nearly three months to read about them in the draft ROD.

The Provider of Choice workshop series should end with increased transparency rather than opaque evasiveness. The unusually high meeting count and number of topics paired with voluminous stakeholder comments has left the Provider of Choice workshops difficult to monitor for many stakeholders. Bonneville’s summary document alone requires expert-level sleuthing to discern. To make matters worse, the April “road show” meetings left many stakeholders wondering what was discussed in closed-door meetings that were neither recorded nor webcast. Bonneville described these meetings as “a series of important public meetings that provided an overview of and solicited feedback on the Provider of Choice draft policy direction” but no such overview has been provided in a truly public forum.

For the reasons described above, RNW is concerned about Bonneville's decision to cancel the May Workshop and strongly urges the agency to stay the original course. The impact Bonneville's Provider of Choice contracts will have on the region can hardly be understated. It is therefore imperative that the agency give full consideration to each of the issues raised by stakeholders and resist the temptation to short cut much needed transparency.

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RNW appreciates Bonneville's consideration of these comments and the recommendations contained herein. Nothing contained in these comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or under Bonneville's tariff or otherwise under contract.

Respectfully submitted on behalf of RNW,

A handwritten signature in black ink that reads "Sidney Villanueva". The signature is written in a cursive, flowing style.

Sidney Villanueva
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